

Review of IRO-005-3.1a—Reliability Coordination—Current Day Operations (Filing 2)

http://www.nerc.com/files/IRO-005-3_1a.pdf

Note: This standard has been updated to reflect an errata change that was approved by FERC on September 13, 2012.

VSLs for Requirement R6:

| Standard, Requirement | Requirement Language | Lower | Moderate | High | Severe | Comments |
|-----------------------|--|-------|---|---|---|---|
| IRO-005-3.1a, R6 | The Reliability Coordinator shall coordinate with Transmission Operators, Balancing Authorities, and Generator Operators as needed to develop and implement action plans to mitigate potential or actual SOL, CPS, or DCS violations. The Reliability Coordinator shall coordinate pending generation and transmission maintenance outages with Transmission Operators, Balancing Authorities, and Generator Operators | N/A | The Reliability Coordinator coordinated with Transmission Operators, Balancing Authorities, and Generator Operators, as needed, to develop action plans to mitigate potential or actual SOL, CPS, or DCS violations but failed to implement said plans. OR | The Reliability Coordinator failed to coordinate with Transmission Operators, Balancing Authorities, and Generator Operators as needed to develop and implement action plans to mitigate potential or actual SOL, CPS, or DCS violations. OR The Reliability Coordinator failed to coordinate pending | The Reliability Coordinator failed to coordinate with Transmission Operators, Balancing Authorities, and Generator Operators as needed to develop and implement action plans to mitigate potential or actual SOL, CPS, or DCS violations and the Reliability Coordinator failed to coordinate pending generation and transmission maintenance outages with Transmission Operators, Balancing Authorities, and Generator Operators | Citing a possible Guideline 3 violation, FERC staff asked what would happen if the RC did not coordinate, as needed, in real time only, and wondered if all aspects of the requirement were appropriately covered in the VSL assignments. NERC staff agreed and modified the Moderate VSL assignment to account for a failure to coordinate in real time only. |

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| | as needed in both the real time and next-day reliability analysis timeframes. | | The Reliability Coordinator failed to coordinate pending generation and transmission maintenance outages with Transmission Operators, Balancing Authorities, and Generator Operators as needed in either the real time reliability analysis time frame or the next-day reliability analysis time frame. | generation and transmission maintenance outages with Transmission Operators, Balancing Authorities, and Generator Operators as needed in both the real time and next-day reliability analysis timeframes. | as needed in both the real time and next-day reliability analysis timeframes. | |
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Original Guideline Explanation for R6 VSLs in [December 1, 2010 VSL Filing 2](#):

In accordance with Guideline 2, the VSLs were modified for clarity and consistency with other standards and VSLs.

- *Guideline 1:* See P. 931-933 of Guideline 1 Analysis in [March 5, 2012 VSL Filing 1](#)
- *Guideline 2:* The VSLs comply with Guideline 2. Additionally, NERC has reviewed the VSL text and has determined that, with the correction of typographical errors, stylistic edits or format changes, the VSL text is clear, specific and objective and does not contain

general, relative or subjective language satisfying Guideline 2b. Thus, the text is not subject to the possibility of multiple interpretations of the VSL(s) and provides the clarity needed to permit the consistent and objective application of the VSL(s) in the determination of penalties by the Compliance Enforcement Authority.

- *Guideline 3:* NERC compared the existing VSLs to the stated requirement language to ensure the VSLs do not redefine or undermine the requirement's reliability goal. In accordance with Guideline 3, the VSL assignments are consistent with the requirement and the degree of compliance can be determined objectively and with certainty.
- *Guideline 4:* The VSL assignments comply with Guideline 4, because they are based on a single violation of a Reliability Standard and are not based on a cumulative number of violations of the same requirement over a period of time.