

A. Introduction

1. **Title:** Reliability Coordination – Responsibilities
2. **Number:** IRO-001-4
3. **Purpose:** To establish the responsibility of Reliability Coordinators to act or direct other entities to act.
4. **Applicability**
 - 4.1. Reliability Coordinator
 - 4.2. Transmission Operator
 - 4.3. Balancing Authority
 - 4.4. Generator Operator
 - 4.5. Distribution Provider
5. **Effective Date:**

See Implementation Plan.
6. **Background:**

See the Project 2014-03 [project page](#).

B. Requirements and Measures

- R1.** Each Reliability Coordinator shall act to address the reliability of its Reliability Coordinator Area via direct actions or by issuing Operating Instructions. *[Violation Risk Factor: High][Time Horizon: Same-Day Operations, Real-time Operations]*
- M1.** Each Reliability Coordinator shall have and provide evidence which may include but is not limited to dated operator logs, dated records, dated and time-stamped voice recordings or dated transcripts of voice recordings, electronic communications, or equivalent documentation, that will be used to determine that it acted to address the reliability of its Reliability Coordinator Area via direct actions or by issuing Operating Instructions.
- R2.** Each Transmission Operator, Balancing Authority, Generator Operator, and Distribution Provider shall comply with its Reliability Coordinator’s Operating Instructions unless compliance with the Operating Instructions cannot be physically implemented or unless such actions would violate safety, equipment, regulatory, or statutory requirements. *[Violation Risk Factor: High] [Time Horizon: Same-Day Operations, Real-time Operations]*
- M2.** Each Transmission Operator, Balancing Authority, Generator Operator, and Distribution Provider shall have and provide evidence which may include but is not limited to dated operator logs, dated records, dated and time-stamped voice recordings or dated transcripts of voice recordings, electronic communications, or

equivalent documentation, that will be used to determine that it complied with its Reliability Coordinator's Operating Instructions, unless the instruction could not be physically implemented, or such actions would have violated safety, equipment, regulatory or statutory requirements. In such cases, the Transmission Operator, Balancing Authority, Generator Operator, or Distribution Provider shall have and provide copies of the safety, equipment, regulatory, or statutory requirements as evidence for not complying with the Reliability Coordinator's Operating Instructions. If such a situation has not occurred, the Transmission Operator, Balancing Authority, Generator Operator, or Distribution Provider may provide an attestation.

- R3.** Each Transmission Operator, Balancing Authority, Generator Operator, and Distribution Provider shall inform its Reliability Coordinator of its inability to perform the Operating Instruction issued by its Reliability Coordinator in Requirement R1. *[Violation Risk Factor: High] [Time Horizon: Same-Day Operations, Real-time Operations]*
- M3.** Each Transmission Operator, Balancing Authority, Generator Operator, and Distribution Provider shall have and provide evidence which may include but is not limited to dated operator logs, dated records, dated and time-stamped voice recordings or dated transcripts of voice recordings, electronic communications, or equivalent documentation, that will be used to determine that it informed its Reliability Coordinator of its inability to perform an Operating Instruction issued by its Reliability Coordinator in Requirement R1.

C. Compliance

1. Compliance Monitoring Process

1.1. Compliance Enforcement Authority

As defined in the NERC Rules of Procedure, "Compliance Enforcement Authority" (CEA) means NERC or the Regional Entity in their respective roles of monitoring and enforcing compliance with the NERC Reliability Standards.

1.2. Compliance Monitoring and Assessment Processes:

As defined in the NERC Rules of Procedure, "Compliance Monitoring and Assessment Processes" refers to the identification of the processes that will be used to evaluate data or information for the purpose of assessing performance or outcomes with the associated reliability standard.

1.3. Data Retention

The following evidence retention periods identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to

provide other evidence to show that it was compliant for the full time period since the last audit.

The Reliability Coordinator, Transmission Operator, Balancing Authority, Generator Operator, and Distribution Provider shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation:

- The Reliability Coordinator for Requirement R1, Measure M1 shall retain voice recordings for the most recent 90-calendar days and documentation for the most recent 12-calendar months.
- The Transmission Operator, Balancing Authority, Generator Operator, and Distribution Provider for Requirements R2 and R3, Measures M2 and M3 shall retain voice recordings for the most recent 90-calendar days and documentation for the most recent 12-calendar months.

If a Reliability Coordinator, Transmission Operator, Balancing Authority, Generator Operator, or Distribution Provider is found non-compliant, it shall keep information related to the non-compliance until mitigation is complete and approved or for the time specified above, whichever is longer.

The Compliance Enforcement Authority shall keep the last audit records and all requested and submitted subsequent audit records.

1.4. Additional Compliance Information

None.

Table of Compliance Elements

| R # | Time Horizon | VRF | Violation Severity Levels | | | |
|-----|---|------|---------------------------|--------------|----------|---|
| | | | Lower VSL | Moderate VSL | High VSL | Severe VSL |
| R1 | Same-Day Operations, Real-time Operations | High | N/A | N/A | N/A | The Reliability Coordinator failed to act to address the reliability of its Reliability Coordinator Area via direct actions or by issuing Operating Instructions. |
| R2 | Same-Day Operations, Real-time Operations | High | N/A | N/A | N/A | The responsible entity did not comply with the Reliability Coordinator’s Operating Instructions, and compliance with the Operating Instructions could have been physically implemented and such actions would not have violated safety, equipment, regulatory, or statutory requirements. |
| R3 | Same-Day Operations, Real-time Operations | High | N/A | N/A | N/A | The responsible entity failed to inform its Reliability Coordinator upon recognition of its inability to perform an Operating Instruction issued by its Reliability Coordinator in Requirement R1 . |

D. Regional Variances

None.

E. Interpretations

None.

F. Associated Documents

None.

Version History

| Version | Date | Action | Change Tracking |
|---------|-------------------|--|-----------------|
| 0 | April 1, 2005 | Effective Date | New |
| 0 | August 8, 2005 | Removed "Proposed" from Effective Date | Errata |
| 1 | November 1, 2006 | Adopted by Board of Trustees | Revised |
| 1 | November 19, 2006 | Changes "Distribution Provider" to "Transmission Service provider" | Errata |
| 1 | April 4, 2007 | Approved by FERC – Effective Date | New |
| 1.1 | October 29, 2008 | Removed "proposed" from effective date BOT adopted errata changes: updated version number to "1.1" | Errata |
| 1.1 | May 13, 2009 | FERC Approval | Revised |
| 1 | May 19, 2011 | Replaced Levels of Noncompliance with FERC-approved VSLs | VSL Order |
| 2 | July 25, 2011 | Revisions under Project 2006-06 to remove Requirement R7 to avoid duplication with IRO-014-2 | Revised |
| 2 | August 4, 2011 | Adopted by Board of Trustees | |
| 3 | July 6, 2012 | Revised in accordance with SAR for Project 2006-06, Reliability Coordination (RC SDT). Revised the standard and retired six requirements (R1, R2, R4, R5, R6, and R9). | Revised |

Standard IRO-001-4 Reliability Coordination - Responsibilities

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|----------|--------------------------|--|---------------------------------------|
| | | Requirement R3 becomes the new R1 and R8 becomes the new R2 and R3. | |
| 3 | August 16, 2012 | Adopted by Board of Trustees | Revised |
| 4 | November 13, 2014 | Adopted by Board of Trustees | Revisions under Project 2014-03 |
| 4 | November 19, 2015 | FERC approved IRO-001-4. Docket No. RM15-16-000, Order No. 817 | |
| <u>4</u> | <u>December 18, 2019</u> | <u>The Guidance and Technical Basis (including the Technical Rationale) section of the standard was removed and placed into a separate document. Because no changes were made to the mandatory and enforceable elements of the standard, the version number remains unchanged.</u> | <u>Technical Rationale Initiative</u> |

Guidelines and Technical Basis

Rationale:

During development of this standard, text boxes were embedded within the standard to explain the rationale for various parts of the standard. Upon BOT approval, the text from the rationale text boxes was moved to this section.

Rationale for Applicability:

Purchasing-Selling Entity and Load-Serving Entity have been deleted from the approved IRO-001-1.1 as they are not listed as entities that the Reliability Coordinator directs in Functional Model v5.

Rationale for Change from Reliability Directive to Operating Instruction:

The change from Reliability Directive to Operating Instruction throughout the standard is in response to NOPR paragraph 64 (*... "We believe that directives from a reliability coordinator or transmission operator should be mandatory at all times, and not just during emergencies (unless contrary to safety, equipment, regulatory or statutory requirements). For example, mandatory compliance with directives in non-emergency situations is important when a decision is made to alter or maintain the state of an element on the interconnected transmission network..."*) This change is also consistent with the proposed COM-002-4.

Rationale for Requirements R2 and R3:

The Transmission Service Provider has been removed from Requirements R2 and R3 as the Transmission Service Provider is not listed in the Functional Model as a recipient of corrective actions issued by the Reliability Coordinator. This allows for the retirement of IRO-004-2.