

## A. Introduction

1. **Title:** Transmission Loading Relief Procedure for the Eastern Interconnection
2. **Number:** IRO-006-EAST-2
3. **Purpose:** To coordinate action between Reliability Coordinators within the Eastern Interconnection when implementing transmission loading relief procedures (TLR) for the Eastern Interconnection to prevent or manage potential or actual System Operating Limit (SOL) and Interconnection Reliability Operating Limit (IROL) exceedances to maintain reliability of the Bulk Electric System (BES).
4. **Applicability:**
  - 4.1. **Functional Entities:**
    - 4.1.1. Reliability Coordinators in the Eastern Interconnection
5. **Effective Date:** See the Implementation Plan for IRO-006-EAST-2.

## B. Requirements and Measures

- R1. Each Reliability Coordinator that initiates the Eastern Interconnection TLR procedure to prevent or mitigate an SOL or IROL exceedance shall identify the TLR level and the congestion management actions to be implemented, and shall update this information at least every clock hour (except TLR-1) after initiation up to and including the hour when the TLR level has been identified as TLR Level 0.<sup>1</sup> [*Violation Risk Factor: Medium*] [*Time Horizon: Real-time Operations*]
- M1. Each Reliability Coordinator shall provide evidence (such as dated logs, voice recordings, or other information in electronic or hard-copy format) that at the time it initiated the Eastern Interconnection TLR procedure, and at least every clock hour after initiation up to and including the hour when the TLR level was identified as TLR Level 0, the Reliability Coordinator identified both the TLR Level and a list of congestion management actions to be implemented in accordance with Requirement R1.
- R2. Each Reliability Coordinator with a Sink Balancing Authority that must implement congestion management actions pursuant to the Eastern Interconnection TLR procedure shall, within 15 minutes of receiving the request from the issuing Reliability Coordinator, instruct the Sink Balancing Authority to implement the congestion management actions, subject to the following exception: [*Violation Risk Factor: High*] [*Time Horizon: Real-time Operations*]
  - Should an assessment determine that one or more of the congestion management actions communicated will result in a reliability concern or will be

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<sup>1</sup> For more information on TLR levels, please see "Implementation Guideline for Reliability Coordinators: Eastern Interconnection TLR Levels Reference Document."

ineffective, the Reliability Coordinator with a Sink Balancing Authority shall coordinate alternate congestion management actions with the issuing Reliability Coordinator.

- M2.** Each Reliability Coordinator with a Sink Balancing Authority that must implement congestion management actions pursuant to the Eastern Interconnection TLR procedure shall provide evidence (such as dated logs, voice recordings, or other information in electronic or hard-copy format) that within fifteen minutes of the receipt of a request, the Reliability Coordinator complied with the request by either 1) instructing the Sink Balancing Authority to implement the congestion management actions requested by the issuing Reliability Coordinator, or 2) instructing the Sink Balancing Authority to implement none or some of the communicated congestion management actions requested by the issuing Reliability Coordinator, and replacing the remainder with alternate congestion management actions if assessment showed that some or all of the requested congestion management actions would have resulted in a reliability concern or would have been ineffective in accordance with Requirement R2.

## C. Compliance

### 1. Compliance Monitoring Process

#### 1.1. Compliance Enforcement Authority:

“Compliance Enforcement Authority” means NERC or the Regional Entity, or any entity as otherwise designated by an Applicable Governmental Authority, in their respective roles of monitoring and/or enforcing compliance with mandatory and enforceable Reliability Standards in their respective jurisdictions.

#### 1.2. Evidence Retention:

The following evidence retention period(s) 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 applicable entity 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.

For Requirement R1 and Requirement R2, the Reliability Coordinator shall maintain evidence to show compliance with Requirement R1 and Requirement R2 for the past 12 months plus the current month.

If a Reliability Coordinator is found non-compliant, it shall keep information related to the non-compliance until found compliant.

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

#### 1.3. Compliance Monitoring and Enforcement Program

As defined in the NERC Rules of Procedure, “Compliance Monitoring and Enforcement Program” 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.

#### 1.4. Additional Compliance Information

None.

### Violation Severity Levels

R #	Violation Severity Levels			
	Lower VSL	Moderate VSL	High VSL	Severe VSL
<b>R1.</b>	The Reliability Coordinator initiating the Eastern Interconnection TLR procedure missed identifying the TLR Level and/or a list of congestion management actions to take as specified by the requirement for one clock hour during the period from initiation up to the hour when the TLR level was identified as TLR Level 0.	The Reliability Coordinator initiating the Eastern Interconnection TLR procedure missed identifying the TLR Level and/or a list of congestion management actions to take as specified by the requirement for two clock hours during the period from initiation up to the hour when the TLR level was identified as TLR Level 0.	The Reliability Coordinator initiating the Eastern Interconnection TLR procedure missed identifying the TLR Level and/or a list of congestion management actions to take as specified by the requirement for three clock hours during the period from initiation up to the hour when the TLR level was identified as TLR Level 0.	The Reliability Coordinator initiating the Eastern Interconnection TLR procedure missed identifying the TLR Level and/or a list of congestion management actions to take as specified by the requirement for four or more clock hours during the period from initiation up to the hour when the TLR level was identified as TLR Level 0.
<b>R2.</b>				The responding Reliability Coordinator did not, within 15 minutes of receiving a request, either 1) instruct the Sink Balancing Authority to implement all the requested congestion management actions, or 2) coordinate alternate congestion management actions with the issuing Reliability Coordinator,

				provided that: assessment showed that the actions replaced would have resulted in a reliability concern or would have been ineffective.
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**D. Regional Variances**

None.

**E. Associated Documents**

Implementation Guideline for Reliability Coordinators: Eastern Interconnection TLR Levels Reference Document

Version History

Version	Date	Action	Change Tracking
1	November 4, 2010	Adopted by NERC Board of Trustees	
1	April 21, 2011	FERC approved IRO-006-EAST-1	
2	August 13, 2015	Adopted by NERC Board of Trustees	Revised to address the recommendations of the Project 2012-09 Interconnected Reliability Operations Five-Year Review Team.
2	December 4, 2015	FERC approved IRO-006-EAST-2. Docket No. RD14-14-001, RD15-3-001 & RD15-5-001	
<u>2</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>

### Rationale

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

**Rationale for recommendation to retire Requirement R1:** The standard drafting team (IRO SDT) agrees with the FYRT's assertion that IRO-006-EAST-1 Requirement R1 is redundant with IRO-008-1, Requirement R3, and IRO-009-1, Requirement R4, and that the requirements in IRO-008-1 and IRO-009-1 are results based and specify a reliability objective to be achieved. The IRO SDT further agrees with the FYRT's conclusion that IRO-006-EAST-1 Requirement R1 simply provides a list of actions to be taken without any parameters for their use.

**Rationale for recommendation to retire Requirement R3:** The IRO SDT agrees with the FYRT's determination that the intent of Requirement R3 is not to define a curtailment process when the IDC is compromised or unavailable. In the event of an Interchange Distribution Calculator (IDC) failure, Transmission Loading Relief (TLR) action would be very limited resulting in manual curtailments and other manual actions to preserve the reliability of the Bulk Electric System. The IRO SDT further agrees with the FYRT's assertion that Requirement R3 contains actions that are automatically generated via the IDC tool and sent to proper entities upon issuance of the TLR. This requirement should be removed from the standard, as it meets Paragraph 81 Criterion B1—Administrative.

**Rationale for revisions to new Requirement R1 (previously Requirement R2):** The IRO SDT provided edits to improve clarity and to incorporate and simplify the sub-requirements into the main requirement.

**Rationale for Revisions to new Requirement R2 (previously Requirement R4):** The IRO SDT provided edits to improve clarity and to incorporate and simplify some of the bullets into the main requirement, and modified the remaining bullet to be a requirement instead of a passive statement.