

**Reliability Standard Audit Worksheet[[1]](#footnote-1)**

IRO-006-EAST-2 – Transmission Loading Relief Procedure for the Eastern Interconnection

***This section to be completed by the Compliance Enforcement Authority.***

|  |  |
| --- | --- |
| **Audit ID:** | Audit ID if available; or REG-NCRnnnnn-YYYYMMDD |
| **Registered Entity:**  | Registered name of entity being audited |
| **NCR Number:**  | NCRnnnnn |
|  **Compliance Enforcement Authority:** | Region or NERC performing audit |
| **Compliance Assessment Date(s)[[2]](#footnote-2):** | Month DD, YYYY, to Month DD, YYYY |
| **Compliance Monitoring Method:**  | [On-site Audit | Off-site Audit | Spot Check] |
| **Names of Auditors:**  | Supplied by CEA |

# **Applicability of Requirements**

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | **BA** | **DP** | **GO** | **GOP** | **IA** | **LSE** | **PA/PC** | **PSE** | **RC** | **RP** | **RSG** | **TO** | **TOP** | **TP** | **TSP** |
| **R1** |  |  |  |  |  |  |  |  | X |  |  |  |  |  |  |
| **R2** |  |  |  |  |  |  |  |  | X |  |  |  |  |  |  |

**Legend:**

|  |  |
| --- | --- |
| Text with blue background: | Fixed text – do not edit |
| Text entry area with Green background: | Entity-supplied information |
| Text entry area with white background: | Auditor-supplied information |

Findings

**(This section to be completed by the Compliance Enforcement Authority)**

|  |  |  |  |
| --- | --- | --- | --- |
| **Req.** | **Finding** | **Summary and Documentation** | **Functions Monitored** |
| **R1** |  |  |  |
| **R2** |  |  |  |

|  |  |
| --- | --- |
| **Req.** | **Areas of Concern** |
|  |  |
|  |  |
|  |  |

|  |  |
| --- | --- |
| **Req.** | **Recommendations** |
|  |  |
|  |  |
|  |  |

|  |  |
| --- | --- |
| **Req.** | **Positive Observations** |
|  |  |
|  |  |
|  |  |

Subject Matter Experts

Identify the Subject Matter Expert(s) responsible for this Reliability Standard.

**Registered Entity Response (Required; Insert additional rows if needed):**

|  |  |  |  |
| --- | --- | --- | --- |
| **SME Name** | **Title** | **Organization** | **Requirement(s)** |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |

R1 Supporting Evidence and Documentation

**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[[3]](#footnote-3). [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.

**Registered Entity Response (Required):**

**Question: Did the Registered Entity initiate Eastern Interconnection TLR Procedures during the audit period?**

[ ]  Yes [ ]  No

[If yes, provide a list of these occurrences and proceed to the Compliance Narrative below. If no, proceed to the Compliance Narrative below.]

**Registered Entity Response (Required):**

**Compliance Narrative:**

Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

Evidence Requested[[4]](#endnote-1):

|  |
| --- |
| **Provide the following evidence, or other evidence to demonstrate compliance.**  |
| For each occurrence, or selection of occurrences as determined by the auditor, during the audit period, that the Reliability Coordinator initiated an Eastern Interconnection TLR:* Provide evidence (such as dated logs, voice recordings, or other information in electronic or hard-copy format) that at the time an Eastern Interconnection TLR procedure was initiated, the Reliability Coordinator identified both the TLR Level and a list of congestion management actions to be implemented in accordance with Requirement R1.
* Provide evidence (such as dated logs, voice recordings, or other information in electronic or hard-copy format) that 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.
 |

Registered Entity Evidence (Required):

|  |
| --- |
| **The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.** |
| **File Name** | **Document Title** | **Revision or Version** | **Document Date** | **Relevant Page(s) or Section(s)** | **Description of Applicability of Document** |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |

Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

|  |
| --- |
|  |
|  |
|  |

Compliance Assessment Approach Specific to IRO-006-EAST-2 R1

***This section to be completed by the Compliance Enforcement Authority***

|  |
| --- |
| For each occurrence, or selection of occurrences as determined by the auditor, for which the Reliability Coordinator initiated an Eastern Interconnection TLR procedure:  |
|  | Verify the RC initially identified a list of congestion management actions to be implemented, and the TLR Level. |
|  | Verify the RC identified a list of congestion management actions to be implemented, and the associated TLR Level, for each hour that the TLR was in effect, including the hour when the system returned to the TLR level 0. |
| **Note to Auditor:**  |

Auditor Notes:

R2 Supporting Evidence and Documentation

**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:

* Should an assessment determine that one or more of the congestion management actions communicated will result in a reliability concern or will be 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.

**Registered Entity Response (Required):**

**Question: Within the audit period, were there any occurrences in which a Sink Balancing Authority within your area was required to implement congestion management actions pursuant to an Eastern Interconnection TLR procedure? ☐ Yes ☐ No**

[If yes, provide a list of these occurrences and proceed to the Compliance Narrative below. If no, proceed to the Compliance Narrative below.]

**Registered Entity Response (Required):**

**Compliance Narrative:**

Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

Evidence Requested:

|  |
| --- |
| **Provide the following evidence, or other evidence to demonstrate compliance.**  |
| For each occurrence, or selection of occurrences as determined by the auditor, that a Sink Balancing Authority within your area was required to implement congestion management actions, 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 that a Sink Balancing Authority implement congestion management actions pursuant to the Eastern Interconnection TLR procedure, the Reliability Coordinator notified the Sink Balancing Authority.  |
| Provide evidence (such as dated logs, voice recordings, or other information in electronic or hard-copy format) that, for any request that a Sink Balancing Authority implement congestion management actions which the Reliability Coordinator determines that such actions would be ineffective or result in a reliability concern, the Reliability Coordinator coordinated alternate congestion management actions with the issuing Reliability Coordinator.Provide evidence (such as dated logs, voice recordings, or other information in electronic or hard-copy format) that after determining alternate congestion management actions, the Reliability Coordinator notified the Sink Balancing Authority and within 15 minutes of receiving the request. |

Registered Entity Evidence (Required):

|  |
| --- |
| **The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.** |
| **File Name** | **Document Title** | **Revision or Version** | **Document Date** | **Relevant Page(s) or Section(s)** | **Description of Applicability of Document** |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |

Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

|  |
| --- |
|  |
|  |
|  |

Compliance Assessment Approach Specific to IRO-006-EAST-2, R2

***This section to be completed by the Compliance Enforcement Authority***

|  |
| --- |
| For each occurrence, or selection of occurrences as determined by the auditor, where the Reliability Coordinator with a Sink Balancing Authority must implement congestion management actions pursuant to the Eastern Interconnection TLR procedure:  |
|  | Verify that within 15 minutes of receiving the request from the issuing Reliability Coordinator, the Reliability Coordinator issued instructions to the Sink Balancing Authority to implement the congestion management actions; OR |
|  | If one or more of the congestion management actions was determined to result in a reliability concern or to be ineffective, verify that the Reliability Coordinator coordinated alternate congestion management actions with the issuing Reliability Coordinator. Also verify that within 15 minutes of determining the alternate actions, the Reliability Coordinator issued instructions to the Sink Balancing Authority to implement the congestion management actions. |

Auditor Notes:

Additional Information:

Reliability Standard

The full text of IRO-006-EAST-2 may be found on the NERC Web Site (www.nerc.com) under “Program Areas & Departments”, “Reliability Standards.”

In addition to the Reliability Standard, there is background information available on the NERC Web Site.

Capitalized terms in the Reliability Standard refer to terms in the NERC Glossary, which may be found on the NERC Web Site.

Sampling Methodology

Sampling is essential for auditing compliance with NERC Reliability Standards since it is not always possible

or practical to test 100% of either the equipment, documentation, or both, associated with the full suite of enforceable standards. The Sampling Methodology Guidelines and Criteria (see NERC website), or sample guidelines, provided by the Electric Reliability Organization help to establish a minimum sample set for monitoring and enforcement uses in audits of NERC Reliability Standards.

Regulatory Language

[*North American Electric Reliability Corp.*, Docket No. RD15-7-000 (Dec. 4, 2015) (letter order).](http://www.nerc.com/FilingsOrders/us/FERCOrdersRules/Letter%20Order%20Approving%20IRO-006-EAST-2%20and%20%20IRO-009-2%20Reliability%20Standards.pdf)  Order approving proposed Reliability Standard IRO-006-EAST-2 (Transmission Loading Relief Procedure for the Eastern Interconnection) and IRO-009-2 (Reliability Coordinator Actions to Operate within IROLs).

Pgs. 1-2. In approving IRO-006-EAST-2, the Commission noted that: “NERC states that proposed Reliability Standard IRO-006-EAST-2 is an improvement to the existing version of the standard because it removes redundant requirements based on “paragraph 81” criteria, revises existing language to clearly delineate applicable entities and the specific actions required, and relocates information in bullet points and subparts to the requirements. . . . NERC also states that both proposed Reliability Standards implement language revisions and format improvements for consistency with recent NERC Board of Trustees-approved Reliability Standards.”

Selected Glossary Terms

The following Glossary terms are provided for convenience only. Please refer to the NERC web site for the current enforceable terms.

Sink Balancing Authority - The Balancing Authority in which the load (sink) is located for an Interchange Transaction and any resulting Interchange Schedule.

Revision History for RSAW

|  |  |  |  |
| --- | --- | --- | --- |
| **Version** | **Date** | **Reviewers** | **Revision Description** |
| 1 | 03/31/2016 | RSAW TF | New Document |
|  |  |  |  |
|  |  |  |  |

1. NERC developed this Reliability Standard Audit Worksheet (RSAW) language in order to facilitate NERC’s and the Regional Entities’ assessment of a registered entity’s compliance with this Reliability Standard. The NERC RSAW language is written to specific versions of each NERC Reliability Standard. Entities using this RSAW should choose the version of the RSAW applicable to the Reliability Standard being assessed. While the information included in this RSAW provides some of the methodology that NERC has elected to use to assess compliance with the requirements of the Reliability Standard, this document should not be treated as a substitute for the Reliability Standard or viewed as additional Reliability Standard requirements. In all cases, the Regional Entity should rely on the language contained in the Reliability Standard itself, and not on the language contained in this RSAW, to determine compliance with the Reliability Standard. NERC’s Reliability Standards can be found on NERC’s website. Additionally, NERC Reliability Standards are updated frequently, and this RSAW may not necessarily be updated with the same frequency. Therefore, it is imperative that entities treat this RSAW as a reference document only, and not as a substitute or replacement for the Reliability Standard. It is the responsibility of the registered entity to verify its compliance with the latest approved version of the Reliability Standards, by the applicable governmental authority, relevant to its registration status.

The NERC RSAW language contained within this document provides a non‑exclusive list, for informational purposes only, of examples of the types of evidence a registered entity may produce or may be asked to produce to demonstrate compliance with the Reliability Standard. A registered entity’s adherence to the examples contained within this RSAW does not necessarily constitute compliance with the applicable Reliability Standard, and NERC and the Regional Entity using this RSAW reserves the right to request additional evidence from the registered entity that is not included in this RSAW. Additionally, this RSAW includes excerpts from FERC Orders and other regulatory references. The FERC Order cites are provided for ease of reference only, and this document does not necessarily include all applicable Order provisions. In the event of a discrepancy between FERC Orders, and the language included in this document, FERC Orders shall prevail. [↑](#footnote-ref-1)
2. Compliance Assessment Date(s): The date(s) the actual compliance assessment (on-site audit, off-site spot check, etc.) occurs. [↑](#footnote-ref-2)
3. For more information on TLR levels, please see “Implementation Guideline for Reliability Coordinators: Eastern

Interconnection TLR Levels Reference Document. [↑](#footnote-ref-3)
4. Items in the Evidence Requested section are suggested evidence that may, but will not necessarily, demonstrate compliance. These items are not mandatory and other forms and types of evidence may be submitted at the entity’s discretion. [↑](#endnote-ref-1)