

**Note: an Interpretation cannot be used to change a standard.**

Request for an Interpretation of a Reliability Standard	
<b>Date submitted:</b>	February 10, 2009
<b>Contact information for person requesting the interpretation:</b>	
<b>Name:</b>	Nancy Bellows
<b>Organization:</b>	WECC Reliability Coordination Subcommittee
<b>Telephone:</b>	970-461-7246
<b>E-mail:</b>	bellows@wapa.gov
<b>Identify the standard that needs clarification:</b>	
<b>Standard Number:</b>	IRO-010-1
<b>Standard Title:</b>	Reliability Coordinator Data Specification and Collection
<b>Identify specifically what needs clarification (If a category is not applicable, please leave it blank):</b>	
<b>Requirement Number and Text of Requirement:</b>	
<b>IRO-010-1</b>	
<p><b>R1.</b> The Reliability Coordinator shall have a documented specification for data and information to build and maintain models to support Real-time monitoring, Operational Planning Analyses, and Real-time Assessments of its Reliability Coordinator Area to prevent instability, uncontrolled separation, and cascading outages. The specification shall include the following:</p> <ul style="list-style-type: none"> <li><b>R1.1.</b> List of required data and information needed by the Reliability Coordinator to support Real-Time Monitoring, Operational Planning Analyses, and Real-Time Assessments.</li> <li><b>R1.2.</b> Mutually agreeable format.</li> <li><b>R1.3.</b> Timeframe and periodicity for providing data and information (based on its hardware and software requirements, and the time needed to do its Operational Planning Analyses).</li> <li><b>R1.4.</b> Process for data provision when automated Real-Time system operating data is unavailable.</li> </ul> <p><b>R3.</b> Each Balancing Authority, Generator Owner, Generator Operator, Interchange Authority, Load-serving Entity, Reliability Coordinator, Transmission Operator, and Transmission Owner shall provide data and information, as specified, to the Reliability</p>	

Coordinator(s) with which it has a reliability relationship.

**Clarification needed:**

1. Does the phrase, "as specified" in Requirement R3 reference the documented data and information specification in IRO-010-1 Requirement R1, or is the data and information in Requirement R3 "any" data and information that the Reliability Coordinator might request?
2. Is the intent of Requirement R3 to have each responsible entity provide its own data and information to its Reliability Coordinator, or is the intent to have responsible entities provide aggregated data (collected and compiled from other entities at the direction of the Reliability Coordinator) to the Reliability Coordinator?
3. Under Requirement R1.2, what actions (on the part of the Reliability Coordinator) are expected to support the "mutually acceptable format" for submission of data and information?

**Identify the material impact associated with this interpretation:**

**Identify the material impact to your organization or others caused by the lack of clarity or an incorrect interpretation of this standard.**

If responsible entities are required to supply the Reliability Coordinator with any data requested by the Reliability Coordinator at any time, including data and information collected and aggregated for the Reliability Coordinator, then the responsible entities will need additional resources to meet the requirements in this standard.

Similarly, if the phrase, "mutually acceptable" does not require that the Reliability Coordinator "negotiate" an acceptable format for receipt of data and information, then the entities providing the data and information may need additional resources to convert their data into a format specified by the Reliability Coordinator. The RC may need additional resources if the phrase "mutually acceptable format" requires negotiation.

**Project 2009-11: Response to Request for an Interpretation of IRO-010-1 for Requirements R1.2 and R3**

The following interpretation of IRO-010-1 — Reliability Coordinator Data Specification and Collection, Requirements R1 and R3, was developed by the IROL Standards Drafting Team.

**Requirement Number and Text of Requirement**

**R1.** The Reliability Coordinator shall have a documented specification for data and information to build and maintain models to support Real-time monitoring, Operational Planning Analyses, and Real-time Assessments of its Reliability Coordinator Area to prevent instability, uncontrolled separation, and cascading outages. The specification shall include the following:

**R1.1.** List of required data and information needed by the Reliability Coordinator to support Real-Time Monitoring, Operational Planning Analyses, and Real-Time Assessments.

**R1.2.** Mutually agreeable format.

**R1.3.** Timeframe and periodicity for providing data and information (based on its hardware and software requirements, and the time needed to do its Operational Planning Analyses).

**R1.4.** Process for data provision when automated Real-Time system operating data is unavailable.

**R3.** Each Balancing Authority, Generator Owner, Generator Operator, Interchange Authority, Load-serving Entity, Reliability Coordinator, Transmission Operator, and Transmission Owner shall provide data and information, as specified, to the Reliability Coordinator(s) with which it has a reliability relationship.

**Question #1**

Does the phrase, "as specified" in Requirement R3 reference the documented data and information specification in IRO-010-1 Requirement R1, or is the data and information in Requirement R3 "any" data and information that the Reliability Coordinator might request?

**Response to Question #1**

The data to be supplied in Requirement R3 applies to the documented specification for data and information referenced in Requirement R1.

**Question #2**

Is the intent of Requirement R3 to have each responsible entity provide its own data and information to its Reliability Coordinator, or is the intent to have responsible entities provide aggregated data (collected and compiled from other entities at the direction of the Reliability Coordinator) to the Reliability Coordinator?

**Response to Question #2**

The intent of Requirement R3 is for each responsible entity to ensure that its data and information (as stated in the documented specification in Requirement R1) are provided to the Reliability Coordinator.

Another entity may provide that data or information to the Reliability Coordinator on behalf of the responsible entity, but the responsibility remains with the responsible entity. There is neither intent nor obligation for any entity to compile information from other entities and provide it to the Reliability Coordinator.

**Question #3**

Under Requirement R1.2, what actions (on the part of the Reliability Coordinator) are expected to support the "mutually acceptable format" for submission of data and information?

**Response to Question #3**

Requirement R1.2 mandates that the parties will reach a mutual agreement with respect to the format of the data and information. If the parties can not mutually agree on the format, it is expected that they will negotiate to reach agreement or enter into dispute resolution to resolve the disagreement.