

**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 Coordination - Operations Planning, Reliability Coordinator Data Specification and Collection, Planned Outage Coordination
<b>Identify specifically what needs clarification (If a category is not applicable, please leave it blank):</b>
<p><b>Requirement Number and Text of Requirement:</b></p> <p><b>IRO-010-1</b></p> <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.