

## **Justification for Retirement**

### **SAR-010 Retirement of Texas RE Regional Standard IRO-006-TRE-1**

The Regional Standard Drafting Team (SDT) for Project SAR-010 Retirement of Texas RE Regional Standard IRO-006-TRE-1 reviewed Regional Standard IRO-006-TRE-1 and concluded Regional Standard IRO-006-TRE-1 should be retired. The SDT found the Regional Standard to be redundant with other continent-wide Reliability Standards.

#### **Background**

On May 31, 2012, FERC approved Regional Standard IRO-006-TRE-1, IROL and SOL Mitigation in the ERCOT Region. The standard went into effect on July 1, 2012. This standard is a result of a FERC directive in Order No. 693, which directed this interconnection to modify its load relief procedures to ensure consistency with the standard form of the Reliability Standards including Requirements, Measures, and Levels of Non-Compliance.

In 2017, Texas RE conducted a five-year review in accordance with the Standards Development Process. Reviewers recommended Regional Standard IRO-006-TRE-1 be retired. On June 27, 2017, the Electric Reliability Council of Texas (ERCOT) submitted a Standard Authorization Request (SAR) for the retirement of Regional Standard IRO-006-TRE-1.

The IRO-006-TRE-1 SDT reviewed the information provided by ERCOT in the SAR and concludes Regional Standard IRO-006-TRE-1 should be retired.

Regional Reliability Standard IRO-006-TRE-1, which is applicable to the Reliability Coordinator (RC), contains two requirements:

**R1.** The RC shall have procedures to identify and mitigate exceedances of identified Interconnection Reliability Operating Limits (IROL) and System Operating Limits (SOL) that will not be resolved by the automatic actions of the ERCOT nodal market operations system. The procedures shall address, but not be limited to, one or more of the following:

- Redispatch of generation;
- Reconfiguration of the Transmission system;
- Controlled load reductions (including both firm and non-firm load shedding).

**R2.** The RC shall act to identify and mitigate exceedances of identified Interconnection Reliability Operating Limits and System Operating Limits that will not be resolved by the automatic actions of the ERCOT Nodal market operations system, in accordance with the procedures required by R1.

NERC Reliability Standards IRO-002-5, IRO-008-2, TOP-001-3, TOP-001-4 and TOP-002-4 became effective on April 1, 2017 and cover the same obligations as the requirements in IRO-006-TRE-1, rendering the regional standard redundant and eligible for retirement. Reliability Standard IRO-009-2, effective since January 1, 2016, also covers certain requirements in Regional Standard IRO-006-TRE-1.

#### **Paragraph 81 Criteria**

FERC's 2012 order approving NERC's Find, Fix, and Track (FFT) compliance program included a recommendation that NERC develop criteria for retirement of Reliability Standard requirements that are "unnecessary or redundant." 138 FERC ¶ 61,193 at P 81 (2012). In Paragraph 81 of the order, the Commission stated: "If NERC believes that specific Reliability Standards or specific requirements within certain Standards should be revised or removed, we invite NERC to make specific proposals to the Commission identifying the Standards or requirements and setting forth in detail the technical basis for its belief." *Id.*

In response, NERC developed the "Paragraph 81 project." Under this project, NERC created criteria to identify requirements that should be retired or modified. One of these criteria considers whether "[t]he Reliability Standard requirement is redundant with: (i) another FERC-approved Reliability Standard requirement(s); (ii) the ERO compliance and monitoring program or (iii) a governmental regulation (e.g., Open Access Transmission Tariff, North American Energy Standards Board ("NAESB"), etc.)." Regional Standard IRO-006-TRE-1 qualifies for retirement under this criterion.

### **IRO-006-TRE-1 Background**

The original intent of Regional Standard IRO-006-TRE-01 was to codify existing ERCOT congestion relief procedures under the NERC standard template, similar to other IRO-006 Standards that address such procedures for the Western and the Eastern Interconnections. Requirement R1 of Regional Standard IRO-006-TRE-1 requires ERCOT, as the sole Reliability Coordinator (RC) in the ERCOT Region, to have procedures to identify and mitigate exceedances of any System Operating Limit (SOL) or Interconnection Reliability Operating Limit (IROL), and Requirement R2 of the standard requires ERCOT to act on those procedures when IROLs and SOLs are exceeded.

### **Coverage of Regional Standard IRO-006-TRE-1 Requirement R1**

Requirement R1 of IRO-006-TRE-1 requires ERCOT, as the RC, to have procedures to identify and mitigate exceedances of IROLs and SOLs. These same obligations are captured in the following currently effective Reliability Standards: IRO-002-5, IRO-008-2, IRO-009-2, TOP-001-3, TOP-001-4, and TOP-002-4. IRO-008-2 Requirement R1 requires ERCOT, as the RC, to perform an Operational Planning Assessment (OPA) to determine if next-day planned operations will exceed any SOL or IROL. Requirement R2 of this same standard requires ERCOT to have an Operating Plan to address SOL and IROL exceedances. IRO-009-2 Requirement R1 requires RCs who identify an IROL one or more days in advance to have Operating Processes, Procedures, or Plans for RCs to take or direct actions to prevent or mitigate each IROL exceedance. Similarly, TOP-002-4 Requirement R1 requires ERCOT, in its capacity as a Transmission Operator (TOP), to have an OPA to determine if next-day operations will exceed any SOL. (Under the TOP Coordinated Functional Registration for the Texas RE region, ERCOT is the only TOP responsible for performing OPAs and Real-Time Assessments (RTAs).)

### **Coverage of Regional Standard IRO-006-TRE-1 Requirement R2**

Requirement R2 of Regional Standard IRO-006-TRE-1 requires ERCOT, as the RC, to identify and mitigate exceedances of identified IROLs and SOLs. These actions are also covered by requirements in other standards. Reliability Standard IRO-002-5 Requirement R3 requires RCs to "monitor Facilities, the status of Remedial Action Schemes, and non-BES facilities... within its Reliability Coordinator Area and neighboring Reliability Coordinator Areas to identify any System

Operating Limit exceedances and to determine any Interconnection Reliability Operating Limit exceedances within its Reliability Coordinator Area.” Reliability Standard IRO-008-2 Requirement R4 requires ERCOT to perform an RTA at least once every 30 minutes, and Requirement R5 of the same standard requires ERCOT to share results of an RTA that identifies an SOL or IROL exceedance with those entities who need to take action to prevent or mitigate the exceedance. Reliability Standard IRO-009-2 Requirements R2 and R3 direct RCs to initiate actions to prevent or mitigate IROL exceedances. Similarly, Reliability Standards TOP-001-3 and TOP-001-4 require ERCOT, as a TOP, to determine SOL exceedances through monitoring (Requirement R10) and to conduct a Real-Time Assessment every 30 minutes (Requirement R13), including an identification of SOL exceedances (Requirement R14). Requirement R14 of Reliability Standards TOP-001-3 and TOP-001-4 further requires ERCOT to initiate its Operating Plan to mitigate an identified SOL exceedance.

The attached mapping table shows how existing NERC Reliability Standards fully cover the two requirements of Regional Standard IRO-006-TRE-1.

#### **Effective Date**

Regional Standard IRO-006-TRE-1, IROL and SOL Mitigation in the ERCOT Region, shall be retired upon the effective date of approval by regulatory authorities.

#### **Justification of Effective Date**

Because the SDT determined all requirements of Regional Standard IRO-006-TRE-1 are covered by existing, currently effective NERC Reliability Standards, the Regional Standard may be retired upon the effective date of approval by regulatory authorities.