
Project QC-2024-01

Standard *IRO-005-3.1a* – Reliability Coordination - Current Day Operations and *TOP-002-2.1b* - Normal Operations Planning

1. OVERVIEW

1.1. Applicability

This document aims to enable the retirement of the Reliability Standards IRO-005-3.1a and TOP-002-2.1b. The following table lists the functional entities to which each of these standards applies.

| Standards to retire | Functions |
|---------------------|--|
| IRO-005-3.1a (R11) | <i>Transmission Service Provider (TSP)</i> |
| TOP-002-2.1b (R12) | |

The requirements R11 of the IRO-005-3.1a and R12 of the TOP-002-2.1b standards are the only requirements in effect in Québec for these two standards. Requirements R1 to R10 and R12 of the IRO-005-3.1a standard and Requirements R1 to R11 and R13 to R19 of the TOP-002-2.1b were retired in D-2017-061¹ of docket R-4001-2017.

1.2. Purpose of the standard

This section describes the purpose of the standards that are the subject of this request. The title and purpose of the standards are as follows:

- **IRO-005-3.1b** - The Reliability Coordinator must be continuously aware of conditions within its Reliability Coordinator Area and include this information in its reliability assessments. The Reliability Coordinator must monitor Bulk Electric System parameters that may have significant impacts upon the Reliability Coordinator Area and neighboring Reliability Coordinator Areas.
- **TOP-002-2.1b** - Current operations plans and procedures are essential to being prepared for reliable operations, including response for unplanned events.

1.3. Regulatory context

i. Project 2012-05 – ATC Revisions (MOD A)

In its project 2012-05 – ATC Revisions (MOD A), NERC had previously proposed the retirement of the MOD-001-1a, MOD-004-1, MOD-008-1, MOD-028-1, MOD-029-1a et MOD-030-2 Reliability Standards in connection with its petition for approval of Reliability Standard MOD-001-2², but later determined that proposed Reliability Standard MOD-001-2 is not needed for reliability and should be withdrawn³. Consequently, MOD-001-2 never came into effect in the United States.

¹ D-2017-061 of docket R-4001-2017, retrieved on November 7, 2023 at : https://www.regie-energie.qc.ca/fr/participants/dossiers/R-4001-2017/doc/R-4001-2017-A-0005-Dec-Dec-2017_06_16.pdf

² NERC Petition for approval of proposed reliability standard MOD-001-2 and retirement of reliability standards MOD-001-1a, MOD-004-1, MOD-008-1, MOD-028-2, MOD-029-1a and MOD-030-2, retrieved on November 7, 2023 at : <https://www.nerc.com/FilingsOrders/us/NERC%20Filings%20to%20FERC%20DL/Petition%20for%20MOD-001-2.pdf>

³ NERC Notice of withdrawal of the proposed reliability standard MOD-001-2, retrieved on November 7, 2023, at : <https://www.nerc.com/FilingsOrders/us/NERC%20Filings%20to%20FERC%20DL/Notice%20of%20Withdrawal%20RM14-7%20MOD-001-2.pdf>

ii. Project 2014-03 de la NERC – Revisions to TOP et IRO Reliability Standards

This project follows the regulatory filing with the Régie de l'énergie (hereinafter "the Régie") relating to the revisions of standards as part of the *North American Electric Reliability Corporation* (hereinafter "NERC") Project 2014-03 « *Revisions to TOP and IRO Reliability Standards* ». As presented in exhibit B-0005⁴ in the docket R-4001-2017, this NERC project aimed to revise the TOP and IRO standards in order to significantly improve the understanding of these standards, to clarify the scope of the data that can be collected and to clearly delineate the responsibilities of the applicable entities.

The Coordinator refers to this project since, as presented in the table "Standards and requirements for the Régie to retire with the corresponding phase" in exhibit B-0005⁵, the retirement of Requirement R11 of the IRO-005-3.1a standard is conditional on the adoption of the MOD-001-1a standard and the retirement of Requirement R12 of the TOP-002-2.1b is conditional on the adoption of the MOD-029-1a standard.

iii. Projet 2018-03 de la NERC – Standards Efficiency Review (SER)

The present project also follows the regulatory filing with the Régie related to modifications to standards as part of NERC Project 2018-03 – Standards Efficiency Review (SER). The purpose of this NERC project is to retire several Reliability Standards on the grounds that the requirements contained therein are duplicative to other requirements, administrative in nature, or are otherwise unnecessary for reliability.

As a result of work performed under the SER project, NERC determined that the MOD-001-1a, MOD-004-1, MOD-008-1, MOD-028-2, MOD-029-1a and MOD-030-3 (hereinafter, "MOD A") Reliability Standards are not needed for reliability and should be retired in their entirety without replacement. NERC explained that these requirements are administrative in nature or relate expressly to commercial or business.⁶

iv. Coordination between NERC et NAESB

In September 2014, the Federal Energy Regulatory Commission (hereinafter, "FERC") issued Order 676-H to incorporate by reference into the Open Access Transmission Tariff (hereinafter "OATT") as mandatory enforceable requirements, with certain enumerated exceptions, the latest version (Version 003) of the Standards for Business Practices and Communication Protocols for Public Utilities adopted by the North American Energy Standards Board (hereinafter, "NAESB"). FERC made adoption of these rules mandatory for transmission providers under its jurisdiction.

In a coordinated effort with NERC concerning the proposed MOD A retirements, NAESB made revisions to several suites of its Wholesale Electric Quadrant (hereinafter, "WEQ") Business Practice Standards. The WEQ Version 003.3 Standards include revisions related to modeling that are included in the NERC's proposed retirement of its MOD A Reliability Standards to the NAESB WEQ-023 Modeling Business Practice Standards. The development of new and revised WEQ version 003.3 Business Practice Standards include commercially relevant requirements from the existing MOD A Reliability Standards being proposed

⁴ R-4001-2017, exhibit B-0005, retrieved on November 7, 2023 at : https://www.regie-energie.qc.ca/fr/participants/dossiers/R-4001-2017/doc/R-4001-2017-B-0005-Demande-Piece-2017_03_03.pdf (in French only)

⁵ R-4001-2017, page 10, exhibit B-0005, retrieved on November 7, 2023 at : https://www.regie-energie.qc.ca/fr/participants/dossiers/R-4001-2017/doc/R-4001-2017-B-0005-Demande-Piece-2017_03_03.pdf#page=10 (in French only)

⁶ NERC petition for approval of revised and retired Reliability Standards under the NERC SER : [https://www.nerc.com/FilingsOrders/us/NERC%20Filings%20to%20FERC%20DL/Final%20Petition%20for%20Approval%20of%20SER%20Retirements%20\(INT,%20FAC,%20PRC,%20and%20MOD\).pdf](https://www.nerc.com/FilingsOrders/us/NERC%20Filings%20to%20FERC%20DL/Final%20Petition%20for%20Approval%20of%20SER%20Retirements%20(INT,%20FAC,%20PRC,%20and%20MOD).pdf)

for retirement.⁷ By retiring the MOD A standards, there is no longer any redundancy between the NERC standards and those of the NAESB.

On October 26, 2023, FERC issued its final order No. 902⁸ in which it approved the proposed retirement of the MOD A standards.

1.4. Proposed effective date

As per FERC Order No. 902, the retirement of the MOD A standards shall become effective in the United States on February 1, 2024⁹, the coordinated effective date of the Version 003.3 of NAESB's Standards for Business Practices and Communication Protocols for Public Utilities adopted by the Wholesale Electric Quadrant (WEQ) of NAESB.

Given the Régie's requirement that standards come into force on the first day of a calendar quarter¹⁰ with at least 60 days¹¹ between the date of the standard's adoption and its effective date and given the importance of having standardized practices, with effective mandatory standards harmonized with the United States, the Coordinator proposes that the Reliability Standards are withdrawn on the first day of the first calendar quarter that is at least 60 days after its adoption by the Régie.

1.5. Reliability Standards to retire

The IRO-005-3.1a and TOP-002-2.1b standards are inactive in the United States since March 31, 2017.¹²

As per the Project 2014-03 – Revisions to TOP-IRO Reliability Standards Mapping Document presented as exhibit B-0007¹³ in docket R-4001-2017, Requirement R11 of the IRO-005-3.1a standard was replaced by requirement R2 of the MOD-001-2 standard.¹⁴ NERC later filed to FERC a notice of withdrawal of the proposed standard MOD-001-2.¹⁵

As for requirement R12 of the TOP-002-2.1b standard, it was replaced by approved MOD-028-2, Requirement R6.1; approved MOD-029-1a, Requirement R3; and approved MOD-030-2, Requirement R2.4. Only MOD-029-1a is applicable to Québec.

Given Requirement R11 of the IRO-005-3.1a standard and requirement R12 of the TOP-002-2.1b standard are mapped to MOD-001a and MOD-029-2a standards respectively, and that these standards will be withdrawn in the United States on February 1, 2024, the Coordinator requests the retirement of the IRO-005-3.1a and TOP-002-2.1b standards in Québec.

⁷ NAESB Status Report on the Development of Modeling, Data, and Analysis Business Practice Standards, retrieved on November 7, 2023 : https://www.naesb.org/pdf4/ferc021020_naesb_status_report_weq_standards_development.pdf

⁸ FERC Order No. 902, retrieved on November 7, 2023 at: https://elibrary.ferc.gov/eLibrary/filelist?accession_number=20231026-3127&optimized=false

⁹ See footnote 7.

¹⁰ In Decision [D-2015-168](#), the Régie set the effective date of standards as the first day of the calendar quarters following the date of adoption.

¹¹ In Decision [D-2016-011](#), the Régie set a minimum of 60 days between the adoption of standards and their effective date.

¹² United States Inactive Standards, retrieved on November 7, 2023 at <https://www.nerc.com/pa/Stand/Pages/USRelStand.aspx>

¹³ R-4001-2017, exhibit B-0007, retrieved on November 7, 2023 at: https://www.regie-energie.qc.ca/fr/participants/dossiers/R-4001-2017/doc/R-4001-2017-B-0007-Demande-Piece-2017_03_03.pdf (in French only)

¹⁴ Requirement R2 of MOD-001-1a corresponds to MOD-001-2, as detailed in the mapping document that provides information on the proposed transition of MOD-001-1a to MOD-002, retrieved on November 7, 2023 at : https://www.nerc.com/pa/Stand/Project%20201205%20MOD%20A%20%20Available%20Transfer%20Capabilit/Mapping_Document_MOD_A_CLEAN_10042013.pdf

¹⁵ NERC notice of withdrawal of the MOD-001-2 standard, retrieved on November 7, 2023 at :

<https://www.nerc.com/FilingsOrders/us/NERC%20Filings%20to%20FERC%20DL/Notice%20of%20Withdrawal%20RM14-7%20MOD-001-2.pdf>

1.6. Modifications to the Glossary

None.

2. ASSESSMENT OF RELEVANCE

NERC initiated Project 2018-03 Standards Efficiency Review to consider the recommendations for Reliability Standard retirements contained in the Standard Authorization Request (SAR).¹⁶ As stated in section 1.5 above, the table presented in docket R-4001-2017, exhibit B-007 details the rationale for retiring each requirement discussed in this document.

Hydro-Québec, in its Transmission Provider activities considers the NAESB rules in its business practices, as indicated in its Business Practices Guide on his OASIS website¹⁷.

In the United States, FERC concluded in its Order 902¹⁸ that the request to retire the MOD A is just, reasonable, not unduly discriminatory or preferential, and in the public interest. NERC provided adequate arguments to conclude that the requirements proposed for retirement provide no reliability benefit and are administrative in nature or relate expressly to commercial practices.

In accordance with the 2009 agreement between the Régie, NERC and the NPCC and with the authorization of the Québec government,¹⁹ these standard revisions were developed and approved by recognized agencies in North America, including Québec or in neighboring systems. In the opinion of the Coordinator, these requirement retirements do not compromise system reliability in Québec, given their commercial nature. The proposed revisions to the Régie are therefore relevant.

3. PRELIMINARY IMPACT ASSESSMENT

This project only concerns requirement and standard retirement. Consequently, the impact is low, even neglectable for Registered Entities.

The following table provides the Reliability Coordinator’s preliminary assessment of the impact on all Québec entities.

| Norme | Impacts | | |
|--------------|--------------|----------|-------|
| | Implantation | Maintien | Suivi |
| IRO-005-3.1a | Low | Low | Low |
| TOP-002-2.1b | Low | Low | Low |

Legend :

Low: Normal industry practice or standard that only requires minor adjustments to existing processes or practices.

Moderate: Change that requires the mobilization of some physical, human or financial resources to implement the proposed standard, enforce it or monitor compliance.

¹⁶ Standard Authorization Request (SAR) du projet 2018-03 de la NERC, consultée le 26 janvier 2021 au https://www.nerc.com/pa/Stand/Standards%20Efficiency%20Review%20DL/Combined_SER_SAR_08282018.pdf (en anglais seulement).

¹⁷ Guide to Business Practices for Hydro-Québec Transmission Services , retrieved on November 7, 2023 at: https://www.oasis.oati.com/woa/docs/HQT/HQTdocs/GuidePratiquesAffaires_2023_09_07_ENG.pdf

¹⁸ See footnote 7

¹⁹ Agreement entered into pursuant to Decree No. 443-2009, issued on April 8, 2009. http://www.regie-lln.energie.qc.ca/audiences/normes_fiab_tranp_elec/Entente_Regie_NERC_NPCC_5mai09.pdf (in French only)

High: Change that requires provision and mobilization of significant physical, human or financial resources to plan and implement the proposed standard, enforce it or monitor compliance.

4. FINAL IMPACT ASSESSMENT

This section will be completed upon receipt of the impact assessment forms and at the conclusion of the consultation process prior to filing of the standards with the Régie