
Project QC-2024-02

Standards Efficiency Review (SER) Phase 2

1. OVERVIEW OF THE STANDARDS

1.1. Applicability

This document aims to enable the revision of the Reliability Standards IRO-010-5 and TOP-003-6.1. The following table lists the functional entities to which each of these standards applies.

Standard	Functions
IRO-010-5	<i>Reliability Coordinator (RC)</i> <i>Balancing Authority (BA)</i> <i>Generator Owner (GO)</i> <i>Generator Operator (GOP)</i> <i>Transmission Owner (TO)</i> <i>Transmission Operator (TOP)</i> <i>Distribution Provider (DP)</i>
TOP-003-6.1	<i>Transmission Operator (TOP)</i> <i>Balancing Authority (BA)</i> <i>Generator Owner (GO)</i> <i>Generator Operator (GOP)</i> <i>Transmission Owner (TO)</i> <i>Distribution Provider (DP)</i>

The Reliability Coordinator in Quebec (hereinafter, the “Coordinator”) emphasizes that there is no change between the applicability of the proposed standards and their previous versions.

1.2. Purpose of the standards

This section describes the purpose of each standard covered by this request. The title and purpose of the standards are as follows:

- **IRO-010-5 – Reliability Coordinator Data and Information Specification and Collection:** To prevent instability, uncontrolled separation, or Cascading outages that adversely impact reliability, by ensuring each Reliability Coordinator has the data and information it needs to plan, monitor, and assess the operation of its Reliability Coordinator Area.
- **TOP-003-6.1 – Transmission Operator and Balancing Authority Data and Information Specification and Collection:** To ensure that each Transmission Operator and Balancing Authority has the data and information it needs to plan, monitor, and assess the operation of its Transmission Operator Area or Balancing Authority Area.

1.3. Regulatory context

i. NERC Project 2021-06 – Standards Efficiency Review (SER) Phase 2

The Coordinator files for adoption by the Régie de l'énergie (the "Régie") the Reliability Standards IRO-010-5 and TOP-010-6.1 of the North American Reliability Corporation (NERC) Project 2021-06¹ (*Modifications to IRO-010 and TOP-003*). This is the second phase of the Standards Efficiency Review (SER Phase 2). The first phase of this project was filed with the Régie under docket R-4149-2021².

This project aims to simplify administrative burdens with the current IRO-010-4 and TOP-003-5 standards and limit unnecessary data requirements that do not contribute to BES reliability.

Reliability Standards IRO-010-5 and TOP-010-6.1 were adopted by the NERC Board of Trustees on August 17, 2023, and approved by the Federal Energy Regulatory Commission (FERC) on November 2, 2023 through Letter Order No. RD23-6-000³. Both standards will take effect in the United States on July 1, 2025⁴.

ii. Affected Reliability Standards in Québec

These Reliability Standards replace Standards IRO-010-4 and TOP-003-5. IRO-010-4 and TOP-010-5 were adopted by the Régie de l'énergie (hereinafter "the Régie") in Decision D-2023-040⁵ and come into effect in Québec on October 1st, 2024.

1.4. Specific provisions for Québec

There are no specific provisions for the standards IRO-010-5 and TOP-010-6.1. The Coordinator requests the renewal of the specific provisions from the previous versions, IRO-010-4 and TOP-010-5, which replace all BES references with Main Transmission System (RTP).

1.5. Proposed effective dates

The NERC Project 2021-06⁶ Implementation Plan proposes that Reliability Standards IRO-010-5 and TOP-010-6.1 become effective on the first day of the first calendar quarter that is 18 months after its regulatory approval. The Reliability Standards will become effective in the United States on July 1, 2025.

The Coordinator considers that NERC's implementation plan meets the Régie's requirement that standards come into force on the first day of a calendar quarter⁷ with at least 60 days⁸ between the date of the standard's adoption and its effective date.

Given the importance of having standardized practices, with effective mandatory standards harmonized with the United States, the Coordinator proposes that the Reliability Standards come into effect on the first day of the first calendar quarter that is 18 months after their adoption by the Régie.

¹ NERC Project 2021-06, retrieved on January 26, 2024 at <https://www.nerc.com/pa/Stand/Pages/Project-2021-06-Modifications-to-IRO-010-and-TOP-003.aspx>

² Docket R-4149-2021, retrieved on January 26, 2024 (in French only) at <https://www.regie-energie.qc.ca/fr/participants/dossiers/R-4149-2021>

³ FERC Order Letter No. RD23-6-000, retrieved on January 26, 2024 at <https://www.nerc.com/FilingsOrders/us/Pages/2023FERCOrdersRules.aspx>

⁴ Standards subject to a future coming into force on the NERC website, retrieved on January 26, 2024 at <https://www.nerc.com/pa/Stand/Pages/USRelStand.aspx>

⁵ Decision D-2023-040, Docket R-4203-2022, retrieved on January 26, 2024 (in French only) at https://www.regie-energie.qc.ca/fr/participants/dossiers/R-4203-2022/doc/R-4203-2022-A-0017-Dec-Dec-2023_03_30.pdf

⁶ NERC Project 2021-06 Implementation Plan, retrieved on January 26, 2024 at https://www.nerc.com/pa/Stand/202105%20Modifications%20to%20IRO010%20and%20TOP003%20DL/2021-06_IRO-010-5_and_TOP-003-6_Implementation_Plan_07212023.pdf

⁷ 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.

⁸ In Decision D-2016-011, the Régie set a minimum of sixty (60) days between the adoption of standards and their effective date.

1.6. Standard to retire

Reliability Standards IRO-010-4 and TOP-010-5 shall be retired as soon as IRO-010-5 and TOP-010-6.1 take effect.

1.7. Modifications to the glossary

No changes to the Glossary.

2. ASSESSMENT OF RELEVANCE

As previously mentioned in docket R-4149-2021 adopted by the Régie⁹, many NERC Reliability Standards have been in effect and mandatory in North America for over ten (10) years. In the last ten (10) years, NERC has embarked on a shift in the standards paradigm.

Previously, NERC adopted absolute do exactly as the standard dictates requirements that contained many specific actions for the Registered Entity. It was found that this rigid approach did not always satisfy the reliability goal.

Today, NERC adopts results-based standards that afford entities flexibility in achieving those results.

This project was initiated by the SER Phase 2 sub-team¹⁰ to limit unnecessary data retention requirements that do not contribute to BES reliability and resiliency, while ensuring that Registered Entities maintain the ability to request and receive any information needed from other Registered Entities to perform the tasks required under Reliability Standards TOP-003 and IRO-010. The drafting team determined that the standard would benefit by requiring the RC, TOP and BA to specify their expectations for data availability and accuracy, taking into account their data needs and planning processes.

The purpose of these proposed revisions is not to excuse noncompliance or lessen reliability, but align expectations across reliability entities and responding entities, and promote continuous improvement in data and information exchange.

In practical terms, the scope of the standards is expanded with the words “data and information”. In order to address administrative burden, the Standard Drafting Team (SDT) members considered how industry perceives data and information, noting there were differences of opinion on the two terms. However, the SDT agreed that both terms were important, and that clarification is needed to aid industry’s assessment of the proposed changes.

Industry participants have suggested that they think of data as being the “bits and bytes” which are normally how industry perceives telemetry and statuses in SCADA and provides to others via ICCP. Others may also consider data as being such things as RAS arming statuses and quantities of load or generation shedding. The scope of a data specification, however, should contain more than routine real time operating data used in real time monitoring. For example, RAS Arming statuses may need context information such as the descriptions of the RAS and its actions. To perform its required assessments, the RC, BA, and TOP data specifications may need to also include information that provides insights for the four reliability tasks: Operational Planning Analysis, Real-time Assessments, Real-time Monitoring, and Balancing Authority analysis functions.

⁹ See note 2.

¹⁰ *Standard Authorization Request (SAR) of NERC project 2021-06*, retrieved on January 26, 2024 at https://www.nerc.com/pa/Stand/202105%20Modifications%20to%20IRO010%20and%20TOP003%20DL/2021-06_SAR_SER_Phase_2_Op_Data_IRO-010_and_TOP-003_07082021.pdf

All the information on NERC's motivations regarding the proposed revisions under the standard, in the Purpose section and in the Requirements section, can be found in the project documentation 2021-06¹¹ or more specifically in the "Technical Rationale" ^{12,13}.

NERC is of the opinion that the standards proposed for adoption are reasonable, are not discriminatory, do not provide any undue advantages and are in the public interest. FERC approved the reasons presented by the NERC in its Order Letter No. RD23-6-000¹⁴.

Standards IRO-010-5 and TOP-003-6.1 are currently being analyzed by the New Brunswick Energy and Utilities Commission¹⁵. In Ontario, the project is currently being analyzed by the Ontario Energy Commission¹⁶.

Considering the information outlined above regarding IRO-010-5 and TOP-003-6.1, and considering that both standards were developed by recognized organizations in North America, including in Québec and neighboring jurisdictions, in accordance with the 2009 agreement between the Régie, NERC and NPCC with the authorization of the Québec government¹⁷, the Coordinator is of the opinion that Reliability Standards IRO-010-5 and TOP-003-6.1 contribute to the reliability of the Québec System and harmonization with neighboring systems.

3. PRELIMINARY IMPACT ASSESSMENT

This section provides the Coordinator's preliminary assessment of the impact on all Québec entities.

For Standards IRO-010-5 and TOP-003-6.1, the revisions proposed result in minor adjustments to the documentation and practices already in place. Additionally, the 2021-06 project's White Paper¹⁸ report provides detailed explanations and guidance to assist industry in its consideration of the proposed changes. For this reason, the Coordinator assesses a low impact for applicable entities.

¹¹ NERC project 2021-06 (TOP-003-6.1) Technical Rationale, retrieved on January 26, 2024 at https://www.nerc.com/pa/Stand/202105%20Modifications%20to%20IRO010%20and%20TOP003%20DL/2021-06_TOP-003-6_Technical_Rationale_07212023.pdf

¹² NERC project 2021-06 (IRO-010-5) Technical Rationale, retrieved on January 26, 2024 at https://www.nerc.com/pa/Stand/202105%20Modifications%20to%20IRO010%20and%20TOP003%20DL/2021-06_IRO-010-5_Technical_Rationale_07212023.pdf

¹³ NERC project 2021-06 (TOP-003-6.1) Technical Rationale, retrieved on January 26, 2024 at https://www.nerc.com/pa/Stand/202105%20Modifications%20to%20IRO010%20and%20TOP003%20DL/2021-06_TOP-003-6_Technical_Rationale_07212023.pdf

¹⁴ See note 3.

¹⁵ New Brunswick Project no. 575, retrieved on January 26, 2024 at <https://filemaker.nbeub.ca/fmi/webd/NBEUB%20ToolKit13>

¹⁶ Ontario Energy Board review process, retrieved on January 26, 2024 at <https://www.ieso.ca/en/Sector-Participants/System-Reliability/OEB-Review-Process>

¹⁷ Agreement entered into pursuant to Decree No. 443-2009 issued on April 8, 2009 (in French only) at https://www.regie-energie.qc.ca/fr/participants/dossiers/R-3996-2016/doc/R-3996-2016-B-0106-Audi-Piece-2018_10_26.pdf

¹⁸ Project 2021-06 White Paper report, retrieved on January 26, 2024 at https://www.nerc.com/pa/Stand/202105%20Modifications%20to%20IRO010%20and%20TOP003%20DL/2021-06_Mod_to_IRO-010_and_TOP-003_White_Paper_Clean_05052023.pdf

The table below shows preliminary assessments of the impact on all Québec entities.

Standard	Impact		
	Implementation	Enforcement	Monitoring
IRO-010-5	Low	Low	Low
TOP-003-6.1	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.

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.