### **Comment Form for Reliability Coordination – Project 2006-06**

Please **DO NOT** use this form.  Please use the [electronic comment form](https://www.nerc.net/nercsurvey/Survey.aspx?s=355fff0f451d4a4983697c802f51255a) to submit comments on the proposed revisions to COM-001-2, IRO-001-2, IRO-002-2 and IRO-005-4.  Comments must be submitted by **March 7, 2011**.  If you have questions please contact Stephen Crutchfield at stephen.crutchfield@nerc.net or by telephone at 609-651-9455.

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| **Individual Commenter Information****(Complete this page for comments from one organization or individual.)** |
| Name:       |
| Organization:       |
| Telephone:       |
| E-mail:       |
| **NERC Region (check all Regions in which your company operates)** |  | **Registered Ballot Body Segment (check all industry segments in which your company is registered)** |
| [ ]  **ERCOT****[ ]  FRCC****[ ]  MRO****[ ]  NPCC****[ ]  RFC****[ ]  SERC****[ ]  SPP****[ ]  WECC****[ ]  NA – Not Applicable** | [ ]  | 1 — Transmission Owners |
|  | [ ]  | 2 — RTOs and ISOs |
|  | [ ]  | 3 — Load-serving Entities |
|  | [ ]  | 4 — Transmission-dependent Utilities |
|  | [ ]  | 5 — Electric Generators |
|  | [ ]  | 6 — Electricity Brokers, Aggregators, and Marketers |
|  | [ ]  | 7 — Large Electricity End Users |
|  | [ ]  | 8 — Small Electricity End Users |
|  | [ ]  | 9 — Federal, State, Provincial Regulatory or other Government Entities |
|  | [ ]  | 10 — Regional Reliability Organizations and Regional Entities |
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| Group Comments (Complete this page if comments are from a group.)**Group Name:****Lead Contact:****Contact Organization:** **Contact Segment:** **Contact Telephone:****Contact E-mail:** |
| **Additional Member Name** | **Additional Member Organization** | **Region\*** | **Segment\*** |
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\*If more than one Region or Segment applies, please list all that apply. Regional acronyms and segment numbers are shown on prior page.

### **Background Information:**

# Based on comments received on the last posting, the RCSDT has revised the proposed definitions in COM-001-2 as:

# Interpersonal Communication: Any medium~~thod~~ that allows two or more individuals to interact, consult, or exchange information.

# Alternative Interpersonal Communication: Any ~~method~~ Interpersonal Communication that is able to serve as a substitute for, ~~and is redundant to normal Interpersonal Communication~~ and does not utilize the same infrastructure (medium) as, ~~normal~~ Interpersonal Communications used for day-to-day operation.

The RCSDT believes that these are better, more concise definitions.

The RCSDT reviewed the Interpersonal Communications capability requirements (COM-001) and determined that there were implicit requirements within the requirements. For example, the requirement to identify an Alternative Interpersonal Communications capability implied that an entity had an interpersonal Communication capability. Rather than leave these requirements implicit, the RCSDT explicitly delineated, by entity, the requirements for Interpersonal Communications capability and Alternative Interpersonal Communications capability. These explicit requirements are R1 through R8.

Minor clarifying revisions were made to R2 and R3 of COM-002-2 and the words “actual or expected” were removed from the proposed definition of Adverse Reliability Impacts. The RCSDT believes that these conforming revisions indicate that consensus has been achieved with respect to COM-002-2.

The RCSDT also is seeking stakeholder input with regard to a FERC Order 693 directive to consider Xcel’s comments relating to COM-002. The comment is as follows:

Paragraph 523: “NERC should consider Xcel’s suggestion that the entity taking operating actions should not be held responsible for the delays caused by the reliability coordinator’s assessment and approval. We note that the operating entity has the authority to take emergency actions to protect its system that may circumvent or preempt the reliability coordinator’s approval process under TOP-001-1 Requirement R3 in cases of personnel safety, potential equipment failure or environmental needs.”

The RCSDT agrees with FERC that an entity has the right and obligation to take action to prevent or mitigate emergencies, etc. Footnote 226 of Order 693 discusses TOP-001 requirements:

Footnote 226: TOP-001-1, R1 states in part “Each transmission operator shall have the responsibility and clear decision-making authority to take whatever actions are needed to ensure the reliability of its area ….” and R2 states in part “Each transmission operator shall take immediate actions to alleviate operating emergencies ….”.

The RCSDT believes that these requirements obviate the need to develop additional requirements to address Xcel’s comment.

The RCSDT also met with FERC staff regarding the requirements contained in the proposed IRO-001. A suggestion was made to move some of the proposed requirements to IRO-002 and IRO-005, as these requirements did not meet the purpose of the proposed IRO-001 standard. The proposed IRO-001 standard is the “umbrella” standard that established Reliability Coordinators and their authority. The requirements that were subsequently re-inserted into IRO-002 and IRO-005 pertained to analysis tool outages and Reliability Coordinator notifications respectively.

The drafting team also re-introduced into IRO-001 the requirement for regions to establish Reliability Coordinators. The requirement is now applicable to Regional Entities and calls for the RE to “ensure at least one or more Reliability Coordinators is certified to continuously assess transmission reliability and coordinate emergency operations among the operating entities within the region and across the regional boundaries”. This requirement was originally proposed to be retired, however, after discussion with NERC legal staff the RCSDT proposed to retain the requirement and revise it as shown in the draft.

**You do not have to answer all questions. Enter All Comments in Simple Text Format.**

*Insert a “check” mark in the appropriate boxes by double-clicking the gray areas.*

1. **Do you agree with COM-001 requirements for Interpersonal Communications capability and Alternative Interpersonal Communications capability (R1-R8)? If not, please explain in the comment area below.**

[ ]  Yes

[ ]  No

Comments:

1. **The RCSDT believes that the requirements of TOP-001-1 obviate the need to develop additional requirements to address Xcel’s comment. Do you agree? If not, please explain in the comment area below.**

[ ]  Yes

[ ]  No

Comments:

1. **Do you agree with the revision to IRO-001, R1 for certifying Reliability Coordinators? If not, please explain in the comment area below.**

[ ]  Yes

[ ]  No

Comments:

1. **Do you agree with moving two requirements from IRO-001 back to IRO-002 relating to Analysis Tool outages? If not, please explain in the comment area below.**

[ ]  Yes

[ ]  No

Comments:

1. **Do you agree with moving two requirements from IRO-001 back to IRO-005 relating to Reliability Coordinator notifications? If not, please explain in the comment area below.**

[ ]  Yes

[ ]  No

Comments:

1. **Do you have any other comment, not expressed in questions above, for the RC SDT?**

Comments: