

Project 2007-02 Posting 8

Frequently Asked Questions Guide

General Questions

1. What were the inputs that drove the development of posting 8 of Project 2007-02?

- The NERC Board of Trustees' November 7th, 2013 Resolution for Operating Personnel Communication Protocols, discussed below;
- Two separate surveys distributed to a sample of industry experts by the Director of Standards Development and the Standards Committee Chair requesting feedback on the draft standard; and
- Consultation on the use of the term "Reliability Directive" in the COM-002-4 standard with the Project 2007-03 Real-time Transmission Operations Standard Drafting Team and the Project 2006-06 Reliability Coordination Standard Drafting Team.
- Industry stakeholder comments from previous drafts of Project 2007-02.

2. Why was the term "Reliability Directive" removed from the definition of Operating Instruction?

The OPCP SDT debated whether to remove the term "Reliability Directive" in response to comments suggesting it should be removed from the definition of "Operating Instruction" and in light of FERC's issuance of the TOP/IRO Notice of Proposed Rulemaking (NOPR), which proposes to remand the definition of "Reliability Directive" along with the proposed TOP and IRO standards. To avoid unnecessary complications with the timing of the NOPR and posting 8, the OPCP SDT consulted with the Project 2007-03 Real-time Transmission Operations and the Project 2006-06 Reliability Coordination Standard Drafting Teams to ask whether they believed removal of the term "Reliability Directive" in the COM-002-4 standard would cause concerns. Both teams agreed that the COM-002-4 standard did not need to require a protocol to identify Reliability Directives as such and that the definition of Operating Instruction could be used absent the term Reliability Directive in COM-002-4 to set the protocols. The OPCP SDT ultimately voted to remove the term. The OPCP SDT also decided to incorporate the phrase "Operating Instruction during an Emergency" in certain Requirements, where needed, to identify Requirements that are subject to a zero-tolerance compliance/enforcement approach.

3. Why does this standard apply to Generator Operators and Distribution Providers?

The OPCP SDT included these Functional Entities in the Applicability section because they can be and are on the receiving end of some Operating Instructions. The OPCP SDT determined that it would leave a gap

to not cover them in a standard that addresses communications protocols for operating personnel. The inclusion of Distribution Providers as an applicable entity also responds to FERC's directive in Order No. 693 to add them as applicable entities to the communications standard. The inclusion of Distribution Providers and Generator Operators is also consistent with the currently approved COM-002-3 standard, which the Board directed be combined with COM-003-1.

Recognizing that Generator Operators and Distribution Providers typically only receive Operating Instructions, the OPCP SDT proposed that only Requirements R3 and R6 apply to these Functional Entities.

4. What does the term *documented communications protocols* refer to?

The term *documented communication protocols* in R1 refers to a set of required protocols specific to the Functional Entity and the Functional Entities they must communicate with. An entity should include as much detail as it believes necessary in their documented protocols, but they must address all of the applicable parts of Requirement R1. Where an entity does not already have a set of documented protocols that meet the parts of Requirement R1, the entity must develop the necessary communications protocols. Entities may also adopt the documented protocols of another entity as its own communications protocols, but the entity must maintain its own set of documented communications protocols to meet Requirement R1.

5. Is this a “zero tolerance” standard

The standard uses the phrase “Operating Instruction during an Emergency” in certain Requirements (R5, R6, R7) to provide a demarcation for what is subject to a “zero tolerance” compliance/enforcement approach and what is not. This is necessary to allow the creation of Violation Severity Levels for each compliance/enforcement approach. **Where “Operating Instruction during an Emergency” is not used, an entity will be assessed under a compliance/enforcement approach that focuses on whether or not an entity met the initial training Requirement (either R2 or R3) and whether or not an entity performed the assessment and took corrective action according to Requirement R4.** The proposed COM-002-4 does not contain a Requirement to adhere to all documented communications protocols during non-Emergency conditions. Under COM-002-4, the assessment and training documentation will provide auditors assurance that responsible entities are using their documented communications protocols and taking corrective actions, as necessary.

Separately listing out Requirements R5, R6, and R7 and using “Operating Instruction during an Emergency” in them does not require a different set of protocols to be used during Emergencies or mandate the identification of a communication as an “Operating Instruction during an Emergency.” The same protocols are required to be used in connection with the issuance of Operating Instructions for all operating conditions. Compliance/enforcement is measured differently using the operating condition as an indicator of which compliance/enforcement approach applies.

6. Do any of the proposed requirements require the use of three-part communication when issuing or receiving an Operating Instruction outside of an Emergency?

Compliance with the standard during non-Emergencies is based on whether or not an entity met the initial training Requirement (either R2 or R3) and whether or not an entity performed the assessment and took corrective action according to Requirement R4. An instance of an Operating Instruction outside of an Emergency not using three-part communication, or any of the other protocols in Requirement R1, is not in and of itself a violation of any requirement of COM-002-4. However, an entity will need be using three-part communication when issuing or receiving an Operating Instruction outside of an Emergency in order to complete the assessment of adherence to the entities' documented communications protocols.

7. Why are entities required to assess the adherence of its operating personnel to the documented communication protocols the entity developed and provide feedback?

Requiring entities to assess and provide feedback to its operating personnel, was also included in the November 7, 2013 NERC Board of Trustees' resolution as an element to include in the standard. Further, the OPCP SDT believes that it is good operating practice for an entity to periodically evaluate the effectiveness of their protocols and improve them when possible. Most entities currently engage in this type of assessment activity for their operating personnel. This assessment and feedback activity by the entity improves reliability as it provides a shorter evaluation and correction cycle than a traditional audit cycle, while reducing the associated compliance burden as well.

Additionally, the OPCP SDT believes it is good operating practice to provide operators with performance feedback on their adherence to the entity's documented protocols. Doing so, provides entities an opportunity to evaluate the performance of their operating personnel and take corrective actions where necessary, which could prevent a miscommunication from occurring and thus possibly prevent an event which could be harmful to the reliability of the Bulk Electric System.

8. Should the BA, RC, and TOP provide their protocols to the GOPs and DPs and each other?

While an entity may choose to provide their protocols to entities to which they communicate, there is not a mandatory and enforceable requirement that they do so.

9. Why is the standard not applicable to Transmission Owners?

Please refer to the Functional Model, found at <http://www.nerc.com/pa/Stand/Pages/FunctionalModel.aspx>. In the document, the following is provided for the Transmission Operator:

The Transmission Operator operates or directs the operation of transmission facilities, and maintains local-area reliability, that is, the reliability of the system and area for which the Transmission Operator has responsibility. The Transmission Operator achieves this by operating the transmission system within its purview in a manner that maintains proper voltage profiles and System Operating Limits, and honors transmission equipment limits established by the Transmission Owner. The Transmission Operator is under the Reliability Coordinator's direction respecting wide-area reliability considerations, that is, considerations beyond those of the system and area for which the Transmission Operator has responsibility and that include the systems and areas of neighboring Reliability Coordinators. The Transmission Operator, in coordination with the Reliability Coordinator, can take action, such as implementing voltage reductions, to help mitigate an Energy Emergency, and can take action in system restoration.

The following is provided for the Transmission Owner:

The Transmission Owner owns its transmission facilities and provides for the maintenance of those facilities. It also specifies equipment operating limits, and supplies this information to the Transmission Operator, Reliability Coordinator, and Transmission Planner and Planning Coordinator. In many cases, the Transmission Owner has contracts or interconnection agreements with generators or other transmission customers that would detail the terms of the interconnection between the owner and customer.

While the Transmission Owner owns the facilities, the Transmission Operator operates the facilities, and as such is subject to this standard. In the case where a Transmission Owner operates facilities, that Transmission Owner is bundled with a Reliability Coordinator or Transmission Operator, and as such would be covered by the standard.

10. If an entity cannot complete a task included in an Operating Instruction, are they non-compliant?

COM-002-4 deals with communication protocols, not actions taken by any entity. If an entity does not take action on an Operating Instruction, it may be a violation of another standard, but is not a violation of COM-002-4.

11. A GOP contacts its TOP and notifies the TOP that a generator is about to trip due to a tube leak. Is this considered an Operating Instruction?

No. This is not a command; it is simply relaying information about the generator to the Transmission Operator.

12. If a Distribution Provider cannot operate a BES Element, would this standard apply to them?

Distribution Providers are applicable entities for this standard. However, if they never receive an Operating Instruction due to their particular circumstance, they would not need to prove compliance with Requirements R3 and R6.

Requirement R1 and Measure M1

13. Pursuant to R1, is it correct that an oral two-party, person-to-person Operating Instruction requires three part communication, but a single-party to multiple-party burst Operating Instruction message only requires two part communication?

Yes. Since the use of three-part communications is not practical when issuing a single-party to multiple-party burst Operating Instruction, it is necessary to include a different set of protocols for these situations.

14. Can you provide some examples of what is meant by written Operating Instructions as contemplated in Requirement R1 Parts 1.1 and 1.4 - 1.6?

One example of a written Operating Instruction is a written switching order. Another example is an Operating Instruction issued by using a text message.

15. Please explain how the current draft does not conflict with TOP-002 R18 (uniform line identifiers)?

Project 2007-03 chose to eliminate TOP-002-2a, Requirement R18 when it developed TOP-002-3. This Requirement stated "Neighboring Balancing Authorities, Transmission Operators, Generator Operators, Transmission Service Providers and Load Serving Entities shall use uniform line identifiers when referring to transmission facilities of an interconnected network." COM-002-4, while reintroducing the concept of line identifiers, limits the scope to only Transmission interface Elements or Transmission interface Facilities (e.g. tie lines and tie substations) for Operating Instructions. This supports both parties being familiar with each other's interface Elements and Facilities, minimizing hesitation and confusion when referring to equipment for the Operating Instruction.

16. Can you explain what "specify when time identification required"? Is this just for entities in multiple time zones?

The OPCP SDT has included this part to add necessary clarity to Operating Instructions to reduce the risk of miscommunications. The inclusion of "specify when time identification required" allows for an entity to evaluate its particular circumstances and communications to determine when it may be appropriate to use time identification in its Operating Instructions. The drafting recognized from comments the need to provide this flexibility while still requiring an entity to address this part in its documented communication protocols. Clarifying time and time zone (where necessary) contributes to reducing misunderstandings and reduces the risk of a grave error during BES operations. This is not exclusively for entities in multiple

time zones, but Operating Instructions between entities in multiple time zones is one example of instances that may need time identification when issuing and receiving Operating Instructions.

17. Why did the drafting team remove the protocol requiring alphanumeric clarifiers?

Based on feedback from industry and consideration of the NERC Board resolution, the drafting team chose to remove alphanumeric clarifiers as a required protocol. Entities are free to include it in their documented communication protocols.

18. Why is there a requirement for the use of the English language?

The drafting team included this part to carry forward the same use of English language included in COM-001-1, Requirement R4 and to retire this requirement from COM-001. The requirement continues to permit the issuer and receiver to use an agreed to alternate language. This has been retained since use of an alternate language on a case-by-case basis may serve to better facilitate effective communications where the use of English language may create additional opportunities for miscommunications. Part 1.1 requires the use of English language when issuing oral or written (e.g. switching orders) Operating Instructions. This creates a standard language (unless agreed to otherwise) for use when issuing commands that could change or preserve the state, status, output, or input of an Element of the Bulk Electric System or Facility of the Bulk Electric System. It also clarifies that an alternate language can be used internally within the organization. The phrase has been modified slightly from the language in COM-001-1, Requirement R4 to incorporate the term "Operating Instruction," which defines the communications that require the use of the documented communications protocols.

Requirements R2 and R3 and Measures M2 and M3

19. Is there an obligation on the part of the entity issuing an Operating Instruction to ensure the receiving operator is trained to receive it?

No. It is the responsibility of the receiving entity to ensure that their operator has received training prior to receiving an Operating Instruction.

20. Why is there a requirement to conduct initial training?

The OPCP SDT has included an initial training requirement in the standard in response to the NERC Board of Trustees' resolution, which directs that a training requirement be included in the COM-002-4 standard. Additionally, requiring entities that issue and/or receive Operating Instructions to conduct initial training with their operating personnel will ensure that all applicable operators will be trained in three-part communication. The OPCP SDT believes this training will reduce the possibility of a miscommunication, which could eventually lead to action or inaction harmful to the reliability of the Bulk Electric System. Ongoing training would fall under an entity's training program in PER-005 or could be listed as a type of corrective action under Requirement R4. As such, this requirement is not in conflict with PER-005, but complements it.

21. Current operating personnel issue and receive Operating Instructions now and thus it is not possible to train them on documented protocols *prior* to their issuing or receiving their first Operating Instruction. If training takes place before the enforcement date for COM-002-4, would an entity meet the expectations of Requirement R2 and/or R3?

Yes.

Requirement R4 and Measure M4

22. Would you please provide more specificity as to how the R.4.1 and 4.2 assessments may be performed?

An entity could perform an assessment by listening to random samplings of each of their operating personnel issuing and/or receiving Operating Instructions. If there were instances where an Operator deviated from the entity's protocols, the entity would provide feedback to the operator in question in any method it sees as appropriate. An example would be counseling or retraining the operator on the protocols.

An entity could assess the effectiveness of its protocols by reviewing instances where operators deviated from those protocols and determining if whether the deviations were caused by operator error or by flaws in the protocols that need to be changed.

23. Doesn't Measure M4 extend beyond the scope of the requirement when it addresses communications which deviated from the protocol and contributed to an emergency?

The purpose of COM-002-4 is "To improve communications for the issuance of Operating Instructions with predefined communications protocols to reduce the possibility of miscommunication that could lead to action or inaction harmful to the reliability of the Bulk Electric System (BES)." If the deviation from the protocol contributed to an emergency, the purpose of this standard was not met. The entity must determine what caused that deviation and address any necessary corrective actions.

Requirements R5 and R6 and Measures M5 and M6

24. What is defined as an Emergency and who is responsible for declaring when an Emergency begins and ends?

The NERC Glossary of Terms defines Emergency as "Any abnormal system condition that requires automatic or immediate manual action to prevent or limit the failure of transmission facilities or generation supply that could adversely affect the reliability of the Bulk Electric System." It is expected that these are abnormal and rare circumstances. There is not an expectation that an Emergency be declared. For further information, please refer to Question 15.

25. Is it a violation of R5 if three-part communication is not used, but an alternative action is taken?

If an operator issues an Operating Instruction during an Emergency and, based on the response from the receiver, or lack thereof, chooses to take an alternative action, that operator has satisfied Requirement R5 and is not in violation.

26. How does the SDT envision operators differentiating, during Real-time, between Emergency Operating Instructions and non-emergency Operating Instructions? Are the operators to explicitly say "this is an Emergency Operating Instruction"?

Separately listing out Requirements R5, R6, and R7 and using "Operating Instruction during an Emergency" in them does not require a different set of protocols to be used during Emergencies or mandate the identification of a communication as an "Operating Instruction during an Emergency." The same protocols are required to be used in connection with the issuance of Operating Instructions for all operating conditions. Their use is measured for compliance/enforcement differently using the operating condition as an indicator of which compliance/enforcement approach applies. In other words, it is not the drafting team's expectation that the operator must differentiate between Emergency and non-Emergency Operating Instructions.

27. Does this standard require TOPs to provide evidence of another parties' compliance in Measure M6?

No. The Measures provide various options that the drafting team considered as ways to demonstrate compliance for Requirement R6. It is not an exhaustive list, and in no way places an expectation on any entity that they must provide evidence of another party's compliance. It simply provides a few options to consider.

28. Can you provide an example of an alternative action being taken?

The following scenario is provided as an example of an alternative action:

A Transmission Operator (TOP) calls a Generator Operator (GOP) to reduce generation due to an Emergency. The GOP does not respond verbally. At that point the TOP could:

- Ask if the GOP understood the Operating Instruction (alternative action).
- Hang up and redial the GOP, assuming that the communication line was dead (alternative action),
- Request a different generator that is effective to reduce (alternative action);
- or
- Call a different contact at the GOP (alternative action)

29. Must the receiver repeat the Operating Instruction back verbatim?

No. The Operating Instruction does not have to be repeated verbatim. The issuer must confirm that the receiver's response of the Operating Instruction was correct.