

Disposition of Requirements Identified in the SAR for Operations Communications Protocols as Possibly Needing either Modification or Movement

Standard No.	Requirement(s) identified in the SAR as possibly needing to be modified or moved to the new standard	SDT Disposition/Explanation
COM-001-1	R4 is a requirement for the Reliability Coordinator's, Transmission Operator's, and Balancing Authority's real-time operating personnel to use English when communicating between entities.	<i>Requirement R4 from COM-001 has been incorporated as Requirement R3 of draft COM-003-1.</i>
COM-002-2	<p><i>R1.1 is a requirement for the Balancing Authority and Transmission Operator to make notifications when there is a threat to reliability.</i></p> <p><i>R2 is a requirement for the Reliability Coordinator, Transmission Operator and Balancing Authority relative to issuing and receiving operating directives.</i></p>	<p><i>Regarding R1.1, the SDT decided to focus on requirements that specify protocols on "How to" communicate <u>rather than</u> specified scenarios of "to Whom" or "When to" communicate (albeit COM-003 communication protocols are expected to be used when conveying real-time, reliability-related information in a high level, generic sense).</i></p> <p><i>The SDT believes this requirement focuses on predetermined communication paths / communications hardware. It does not appear to be appropriate to relocate this requirement.</i></p> <p><i>Requirement R2 to use Three-part Communication is currently in the scope of work for Project 2006-06. This Project includes a new Glossary term Reliability Directive. Upon completion of the Project 2006-06 development, the revisions to COM-002-3 will be moved to COM-003-1 and COM-002-3 will be retired.</i></p>
EOP-001-0	R4.1 includes a requirement for the Transmission Operator and Balancing Authority to have communications protocols for use during emergencies (and Attachment 1-EOP-001-0)	<i>R4.1 and EOP-001 as a whole requires "plans" for mitigating emergencies. These communication protocols differ from COM-003 protocols in that R4.1 involves actions and tasks for mitigating operational emergencies and for coordinating activities; not how to communicate.</i>
EOP-002-2	<p>R6.5 and R7.2 require the Balancing Authority to ask the Reliability Coordinator to declare an Energy Emergency or an Energy Emergency Alert under certain conditions</p> <p>R8 requires the Reliability Coordinator to issue an Energy Emergency Alert under certain conditions</p> <p>R9.1 requires the Load-serving Entity to ask the Reliability Coordinator</p>	<p><i>R6.5 and R7.2 prescriptively provide detail in the standard for remedies to capacity emergencies. These requirements specify the "when", "who" and "what" to communicate not "how" to communicate. Relocating or modifying these requirements is not appropriate.</i></p> <p><i>R8 of EOP-002 likewise specifies the "when" for an RC to declare an emergency alert; not "how" to communicate.</i></p> <p><i>R9.1 of EOP-002 likewise specifies the "when" for an LSE to request its RC to declare an emergency alert; not "how" to communicate.</i></p>

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	to declare an Energy Emergency Alert under certain conditions	
EOP-006-1	<p>R4 requires the Reliability Coordinator to disseminate information regarding restoration to neighboring Reliability Coordinators and Transmission Operators or Balancing Authorities</p> <p>R5 requires the Reliability Coordinator to approve, communicate, and coordinate the re-synchronizing of major system islands or synchronizing points</p>	<p><i>The SDT decided to focus on requirements that specify protocols on “How to” communicate rather than “to Whom” or “When to” communicate. The SDT believes these requirements involve information/content and/or timing of certain communications and therefore these requirements should not be duplicated or relocated to COM-003-1 Standard because it would reduce the effectiveness of the existing standard or requirement.</i></p> <p><i>COM-003-1 is complementary to EOP-006-1 and must be complied with in conjunction with each other during emergencies.</i></p>
CIP-001-1	R1 and R2 require operating entities to have procedures for communicating information relative to sabotage of bulk power system facilities	<p><i>These requirements require procedures to be followed during emergency situations such as sabotage/security events. COM-003-1 requires protocols for ensuring understanding and conveying information in a generic sense regardless of the specific information.</i></p> <p><i>COM-003-1 is complementary to CIP-001-1 and must be complied with in conjunction with each other during sabotage emergencies.</i></p>
CIP-008-1	R1.2 requires the responsible entity to have a communication plan for response to a cyber security incident	<p><i>This requirement requires a plan, not how to ensure understanding of reliability-related information.</i></p> <p><i>COM-003-1 is complementary to CIP-008-2 R1.2 and must be complied with in conjunction with each other during Cyber Security emergencies.</i></p>
IRO-001-1	R3 requires the Reliability Coordinator to direct entities to act and R8 requires entities to respond to the Reliability Coordinator’s directives	<p><i>The purpose of this standard and its requirements is to specifically ensure IROs are mitigated within 30 minutes to ensure reliability of the BES per the direction of the Reliability Coordinator.</i></p> <p><i>The generic communication protocols of COM-003-1 can be used but removing any of the words from IRO-001-1 would dilute that standard.</i></p> <p><i>The SDT decided to focus on requirements that specify protocols on “How to” communicate rather than “to Whom” or “When to” communicate. The SDT believes the requirements R3 and R8 of IRO-001-1 involve information/content and/or timing of certain communications and therefore these requirements should not be duplicated or relocated to COM-003-1 Standard because it would</i></p>

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		<p><i>reduce the effectiveness of the existing standard or requirement.</i></p> <p><i>COM-003-1 is complementary to IRO-001-1 R3 and R8; and must be complied with in conjunction with each other to preserve the integrity and reliability of the Bulk Electric System.</i></p>
IRO-004-1	R6 requires the Reliability Coordinator to direct entities to act and R7 requires entities to respond to the Reliability Coordinator's directives	<p><i>These requirements provide direction as to actions that should be taken when the results of next-day system studies reveal potential IROL and SOL violations within the system and not how to communicate.</i></p>
IRO-005-2	<p>R4 requires the Reliability Coordinator to issue an Energy Emergency Alert under certain conditions</p> <p>R3, R5, R8, R11, R15, and R17 require the Reliability Coordinator to direct actions to alleviate various types of abnormal or emergency situations</p>	<p><i>These requirements tell the RC "when" to take certain actions.</i></p> <p><i>R4 prescriptively provide detail in the standard for remedies to operating reserve in order to meet CPS and DCS requirements. Requirement R4 specify the "when", "who" and "what" to communicate not "how" to communicate. Relocating or modifying these requirements is not appropriate.</i></p> <p><i>R3, R5 R8, R11, R15 and R17 of IRO-005-2 specifies the "what" and "when" for RCs to mitigate potential IROL violations and CPS/DCS violations; not "how" to communicate.</i></p>
IRO-014-1	R1.1 requires Reliability Coordinators to have procedures processes or plans that address communications and notifications made between Reliability Coordinators under various operating scenarios	<p><i>This requirement specifies the contents of plans that are needed to be pre-established as well as the process to follow but not necessarily the "how" as prescribed in COM-003.</i></p> <p><i>COM-003-1 is complementary to IRO-0014-1 R1.1; and must be complied with in conjunction with each other to ensure that each Reliability Coordinator's operations are coordinated.</i></p>
PRC-001-1	R6 requires the Transmission Operator and Balancing Authority to make notifications when there is a change in the status of a special protection system	<p><i>R6 specifies that when a Special Protection System's status has changed the BA/TOP shall notify affected BA/TOPs of such a change. This is a "when" to communicate issue. COM-003-1 is complementary to PRC-001-1 R6.</i></p>
TOP-001-1	<p>R3 requires some responsible entities to comply with the Reliability Coordinator's and Transmission Operator's directives</p> <p>R4 requires some responsible entities to comply with the Transmission Operator's directives</p>	<p><i>These are "when" to communicate requirements and should not be relocated.</i></p> <p><i>COM-003-1 is complementary to TOP-001-1 and must be complied with in conjunction with each other to ensure that directives are</i></p>

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	R5 requires the Transmission Operator to notify its Reliability Coordinator of certain emergency situations	<i>understood and coordinated.</i>
TOP-002-2	R14, R16 and R17 require responsible entities to notify their Reliability Coordinator of various changes to operating parameters R18 requires the use of uniform line identifiers when referring to transmission facilities of an interconnected network	<i>These are “when” to communicate requirements and should not be relocated. COM-003-1 is complementary to TOP-002-2 and must be complied with in conjunction with each other. The SDT recommends that TOP-002-2 R18 be retired and to add applicability to LSE and TSP in the COM-003-1 Standard.</i>
TOP-007-0	R1 requires the Transmission Operator to notify its Reliability Coordinator when it exceeds an SOL or IROL R4 requires the Reliability Coordinator to direct entities to take actions to restore the system to within SOLs or IROLs	<i>These are “when” to communicate requirements and should not be relocated. COM-003-1 is complementary to TOP-007-0 and must be complied with in conjunction with each other.</i>
TOP-008-1	R3 requires the Transmission Operator to make notifications if it disconnects an overloaded facility	<i>This is a “when” and a “what” to communicate requirement and should not be relocated. COM-003-1 is complementary to TOP-008-1 and must be complied with in conjunction with each other.</i>
VAR-001-1	R8 and R12 require the Transmission Operator to direct actions to maintain voltage within limits and to prevent voltage collapse	<i>This is a “when” and a “what” to communicate requirement and should not be relocated. COM-003-1 is complementary to VAR-001-1 and must be complied with in conjunction with each other.</i>
VAR-002-1	R2.2 and R5.1 require the Generator Operator to comply with directives R3 requires the Generator Operator to notify the Transmission Operator of various status or capability changes	<i>This is a “when” and a “what” to communicate requirement and should not be relocated. COM-003-1 is complementary to VAR-002-1 and must be complied with in conjunction with each other.</i>