Unofficial Comment Form
COM-002-4

Please **DO NOT** use this form. Please use the [electronic comment form](https://www.nerc.net/nercsurvey/Survey.aspx?s=8f8784325f3246b99a785b8820d84985) to submit comments on the proposed draft COM-002-4 (Operating Personnel Communications Protocols) standard. Comments must be submitted by **January 31, 2014**. If you have questions please contact Stephen Eldridge by email or by telephone at 404-446-9686.

<http://www.nerc.com/pa/Stand/Pages/Op_Comm_Protocol_Project_2007-02.aspx>

### Background Information:

Effective communication is critical for Bulk Electric System (BES) operations. Failure to successfully communicate clearly can create misunderstandings resulting in improper operations increasing the potential for failure of the BES. The eighth posting of Project 2007-02 is a continuation of the previous draft which combined COM-002-3 and COM-003-1 into one standard titled COM-002-4 that addresses communications protocols for operating personnel in Emergency, alert, and non-emergency situations.

The Standard Authorization Request (SAR) for this project was initiated on March 1, 2007 and approved by the Standards Committee on June 8, 2007. It established the scope of work for Project 2007-02 Operating Personnel Communications Protocols (OPCP). The scope described in the SAR is to establish essential elements of communications protocols and communications paths such that operators and users of the North American BES will efficiently convey information and ensure mutual understanding. The August 2003 Blackout Report, Recommendation Number 26, calls for a tightening of communications protocols. Federal Energy Regulatory Commission (FERC) Order 693 paragraph 532 reiterates this need. This proposed standard’s goal is to ensure that effective communication is practiced and delivered in clear and consistent language.

The standard will be applicable to Transmission Operators, Balancing Authorities, Reliability Coordinators, Generator Operators, and Distribution Providers. These requirements ensure that communications include essential elements such that information is efficiently conveyed and mutually understood for communicating Operating Instructions.

The Purpose statement of COM-002-4 states: “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).”

1. **New NERC Glossary term**: The OPCP Standards Drafting Team (SDT) revised the definition of Operating Instruction from its previous drafts. The current definition reads “A command by operating personnel responsible for the Real-time operation of the interconnected Bulk Electric System to change or preserve the state, status, output, or input of an Element of the Bulk Electric System or Facility of the Bulk Electric System. (A discussion of general information and of potential options or alternatives to resolve Bulk Electric System operating concerns is not a command and is not considered an Operating Instruction.)” The Project 2007-02 SDT removed the term “Reliability Directive” in order to avoid complications that may result from the Notice of Proposed Rulemaking issued by the Federal Energy Regulatory Commission on November 21, 2013 proposing to remand the definition of “Reliability Directive.” COM-002-4 uses the defined term “Operating Instruction” to define the circumstances when documented communications protocols must be used. This term is proposed for addition to the North American Electric Reliability Corporation (NERC) Glossary to establish meaning and usage within the electricity industry.
2. **Project 2007-02, Posting 8 continues to combine COM-002-3 and COM-003-1 into COM-002-4.** The OPCP SDT combined COM-002-3 and COM-003-1 in posting 7 into one standard in order to simplify communications protocols for operating personnel. This construct has been maintained in the posting 8 draft. The OPCP SDT determined that one communications protocols standard that addresses Emergency, alert, and non-emergency situations will improve communications because system operators will not need to refer to a different set of protocols during an emergency situation. The OPCP SDT believes this will improve consistency of communications and mitigate confusion during stressful emergency situations. The OPCP SDT decided to combine the standards under the title COM-002-4 to further reduce confusion. The COM-002-4 title keeps the numbering of COM standards consecutive (*e.g.*, COM-001, COM-002).
3. **Project 2007-02, Posting 8 features 7 requirements.** The The OPCP SDT developed the requirement structure and language in posting 8 to incorporate Emergency, alert, and non-emergency communications protocols. The language in COM-002-4, Requirement R1 permits applicable entities flexibility to develop their communication protocols but requires a set of minimum elements in the communications protocols. Requirement R1 requires communications protocols to include the following elements:
	1. English Language: Requirement R1, Part 1.1 – Require the issuer and receiver of an oral or written Operating Instruction to use the English language, unless agreed to otherwise. An alternate language may be used for internal operations.
	2. Three-part Communication for Oral Operating Instructions: Requirement R1, Parts 1.2 and 1.3 – Require three-part communication for issuers and receivers of oral two-party, person-to-person Operating Instructions.
	3. One-way Burst Message Receipt Confirmation and Clarification: Requirement R1, Part 1.4– Requires the issuer of a written or oral single-party to multiple-party burst Operating Instruction to verbally or electronically confirm receipt by at least one receiver of the Operating Instruction. Time Identification: Requirement R1, Part 1.5 – Specify the instances that require time identification when issuing an oral or written Operating Instruction and the format for that time identification.
	4. Transmission Interface Elements and Facilities Nomenclature: Requirement R1, Part 1.6 – Specify the nomenclature for Transmission interface Elements and Transmission interface Facilities when issuing an oral or written Operating *Inst*ruction.

Requirements R2 and R3 require each Balancing Authority, Reliability Coordinator, Transmission Operator, Distribution Provider and Generator Operator to conduct initial training for operating personnel who can issue and/or receive Operating Instructions . These requirements mandate that before operating personnel can issue or receive an Operating Instruction, the operating personnel in question must receive the training listed in the respective requirement.

Requirement R4 mandates a feedback loop for each Balancing Authority, Reliability Coordinator, and Transmission Operator, where the entity must assess the adherence of its operating personnel to the communication protocols the entity developed (with appropriate corrective actions) as well as assess the effectiveness of its documented communication protocols for its operating personnel that issue Operating Instructions.

Requirements R5 and R6 require the use of three part communication during Emergency conditions without exception, per the November 13, 2013 NERC Board of Trustees resolution.

Requirement R7 requires each Balancing Authority, Reliability Coordinator, and Transmission Operator that issues a written or oral single-party to multiple-party burst Operating Instruction to confirm the receipt of that Operating Instruction by at least one receiver.

The OPCP SDT is posting the standard for industry comment for a **30-day** comment period. The OPCP SDT received a waiver of the 45-day comment period required in the NERC Standards Process Manual from the NERC Standards Committee on December 11, 2013. Accordingly, we request that you include your comments on the electronic form by **January 31, 2014**.

Questions

1. **Do you agree that that the COM-002-4 standard addresses addresses the NERC Board of Trustees November 19th, 2013 Resolution? If not, please explain in the comment area**?

[ ]  Yes

[ ]  No

Comments:

1. **Do you agree that COM-002-4 addresses the August 2003 Blackout Report Recommendation number 26, and FERC Order 693? If not, please explain in the comment area.**

[ ]  Yes

[ ]  No

Comments:

1. **Do you agree with the VRFs and VSLs for the Requirements? If not, please explain.**

[ ]  Yes

[ ]  No

Comments:

1. Do you have any additional comments? Please provide them here.

[ ]  Yes

[ ]  No

Comments: