

Consideration of Comments

Reliability Coordination – Project 2006-06

The Reliability Coordination Drafting Team thanks all commenters who submitted comments on the fifth formal posting for Project 2006-06—Reliability Coordination. These standards were posted for a 30-day public comment period from January 9, 2012 through February 8, 2012. Stakeholders were asked to provide feedback on the standards and associated documents through a special electronic comment form. There were 62 sets of comments, including comments from approximately 170 different people from approximately 106 companies representing 9 of the 10 Industry Segments, as shown in the table on the following pages.

Summary Consideration

The RCSDT received comments from stakeholders, where a majority of those comments were focused on compliance elements of the standards, various errors, and other ambiguities. The RCSDT believes it has been responsive to the many comments and has either provided adequate explanation, where applicable, as well as incorporating the needed clarifications or corrections. There were no strong minority issues revealed in the comments which the RCSDT could not address. Revisions made to the standards are summarized in the following sections by standard.

COM-001-2

In the last posting and successive ballot, the standard received approval from about half of the ballot body with numerous comments. The RCSDT made substantive changes to the standard based on comments. The changes to COM-001-2, R3 and R4 require the standard to undergo a second successive ballot. The RCSDT believes it has addressed stakeholder comments and concerns in such a way that the standard is improved and meets the expectation expressed in comments for reliability and industry approval. Upon achieving industry consensus, this standard will advance to a recirculation ballot.

Purpose: Removed the text “for the exchange of Interconnection and operating information” based on comments received and due to the fact that the standard is for capability, which enables information exchange under other standards.

Effective Date: The language in the effective date was made consistent with current Standard Drafting Guidelines.

Requirements: Most changes were minor. In places where the capitalized word “Adjacent” began the requirement Parts, the RCSDT added the word “Each” and made “Adjacent” lowercase to avoid the perception of a defined glossary term. This change occurred in Parts 1.2, 2.2, 3.5, 4.3, 5.5, and 6.3. A significant change occurred in requirements R3 and R4. The RCSDT addressed stakeholders concerns

about the use of “synchronously connected within the same Interconnection.” This was addressed by removing the phrase “within the same Interconnection;” however, other comments were concerned that synchronously did not address DC ties. The RCSDT addressed this by adding a Part, which reads, “Each Transmission Operator asynchronously connected” to Requirements R3 and R4. Requirement R10 was updated to more accurately reflect the reference to other requirements. It should not have referenced R1 through R6; but, rather, R1, R3, and R5. Requirement R11 was updated to address stakeholder concerns about reaching a “mutually agreeable time,” so was changed to “mutually agreeable action.” Other minor changes included making plural terms singular and replacing “per” for “each” for readability and understanding.

Some commenters had concerns about conditions of non-compliance if the entity’s Interpersonal Communication capability failed. To address this concern, the RCSDT added conforming language to Requirements R1, R3, R5, R7 and R8 that bridges the potential gap in non-compliance for a failed Interpersonal Communication capability.

Measures: Most changes to the measures were non-substantive and provided better formatting for readability. Measures M3 and M4 were updated to align with the changes to the parts of Requirements R3 and R4 regarding synchronous and asynchronous. Several measures had inconsistent example evidence for the performance of the requirement. For example, time (hour/minute) based elements are introduced in R9 and R10; however, the measures did not note using dated and “time-stamped” evidence. Likewise, previous requirements did make use of “time-stamped” where there was no time based (hour/minute) performance. The RCSDT found this an unnecessary compliance burden. Other minor changes included making plural terms singular and replacing “per” for “each,” for readability and understanding.

Compliance, Compliance Enforcement Authority: The language in the CEA section was made consistent with current Standard Drafting Guidelines.

Compliance, Data Retention: The language in the data retention section was made consistent with current Standard Drafting Guidelines. The bulleted items were reformatted for consistency and readability.

Violation Severity Levels: Clarifying changes were made to the VSLs. Terms were made singular, the word “Requirement” added to appropriately designate the applicable requirement, and added the two newly-created parts from Requirements R3 and R4. The RCSDT added High VSLs for Requirements R1 through R8 to conform with VSL Guidelines. Requirements R1 through R8 are not binary only.

COM-002-3

The changes to COM-002-3 are considered non-substantive; therefore, the standard will advance to a recirculation ballot. The RCSDT believes it addressed stakeholder comments and concerns in such a

way that the updated sections of the standard is improved and overall meets industry's expectation for approval. Following approval, this standard will be submitted for adoption by the NERC Board of Trustees

Effective Date: The language in the effective date was made consistent with current Standard Drafting Guidelines.

Requirements: For the named functional entities in Requirements R2 and R4, the conjunction "and" previously used has been changed to "or," based on comments received from stakeholders.

Measures: Corresponding changes to Measures M2 and M3 were made in regards to Requirement R2 and R3. Measure M2 received an addition to include the phrasing, "restated, rephrased, or recapitulated" for consistency with Requirement R2.

Compliance, Compliance Enforcement Authority: The language in the CEA section was made consistent with current Standard Drafting Guidelines.

Compliance, Data Retention: The language in the data retention section was made consistent with current Standard Drafting Guidelines. Some bulleted items were corrected to accurately align them with the respective requirements.

Violation Severity Levels: One clarifying change was made to the R3 VSL. The RCSDT added a High VSL to accurately capture the condition where the entity failed to confirm the response of the recipient and removed the first part of the Severe VSL.

IRO-001-3

The changes to IRO-001-3 are considered nonsubstantive; therefore, the standard will advance to a recirculation ballot. The RCSDT believes it addressed stakeholder comments and concerns in such a way that the updated sections of the standard are improved and overall meets industry's expectation for approval. Following approval, this standard will be submitted for adoption by the NERC Board of Trustees

Effective Date: The language in the effective date was made consistent with current Standard Drafting Guidelines.

Requirements: In requirement R1, the last word (glossary term) was made singular for clarity and consistency with the definition. Requirement R2 was missing a conjunction in the functional entities, and this has been added.

Measures: Measure M1 was updated to use past tense language, consistent with drafting guidelines. Also, the parenthetical on “Reliability Directive(s)” was removed and the glossary term made singular for consistency with R1. Measure M2 addressed stakeholder comments by adding the word “physically,” phrase now reads, “physically implemented” to be consistent with Requirement R2, as well as making the term “direction” singular.

Compliance, Compliance Enforcement Authority: The language in the CEA section was made consistent with current Standard Drafting Guidelines.

Compliance, Data Retention: The language in the data retention section was made consistent with current Standard Drafting Guidelines. Some bulleted items were corrected to accurately align them with the respective requirements and remove inaccurate bullets from previous postings.

Violation Severity Levels: Clarifying changes were made to the R1 VSL. The phrase, “exercise its authority” was added, based on stakeholder comment, to more accurately reflect Requirement R1. The RCSDT removed the High VSL from R2, and more accurately incorporated it into the Sever VSL.

Additional Information

All comments submitted may be reviewed in their original format on the standard’s project page:

http://www.nerc.com/filez/standards/Reliability_Coordination_Project_2006-6.html

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Vice President of Standards and Training, Herb Schrayshuen, at 404-446-2560, or at herb.schrayshuen@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

¹ The appeals process is in the Standard Processes Manual: http://www.nerc.com/files/Appendix_3A_StandardsProcessesManual_20120131.pdf

Index to Questions, Comments, and Responses

1. The RCSDT has revised the applicability of the standards and implementation plans by aligning COM-001-2, COM-002-3, and IRO-001-2 to apply to the same entities and by removing LSE, PSE and TSP as applicable entities from the COM standards. Additionally, the Interchange Coordinator has been removed as an applicable entity from the standards. Do you agree with this change in applicability to the three standards? If not, please explain in the comment area below. ... 14
2. Do you agree with the addition of “Adjacent” entities in COM-001-2, Parts 3.5, 4.3, 5.5 and 6.3 of COM-001-2? If not, please explain in the comment area below. 28
3. The RCSDT removed the phrase "to exchange Interconnection and operating information" in COM-001-2, Requirements R1 through R8 based on stakeholder comments. Do you agree with the revision? If not, please explain in the comment area below. 39
4. A new requirement was added for clarity regarding what is required of Distribution Providers and the Generator Operators: R11. Each Distribution Provider and Generator Operator that experiences a failure of any of its Interpersonal Communication capabilities shall consult with their Transmission Operator or Balancing Authority as applicable to determine a mutually agreeable time to restore the Interpersonal Communication capability. [Violation Risk Factor: Medium][Time Horizon: Real-time Operations] This requirement requires collaboration between entities to restore a failed communications capability. Do you agree with the new requirement? If not, please explain in the comment area below..... 47
5. The proposed definition of Reliability Directive shown in COM-002-3 was revised to include Adverse Reliability Impact as shown to more fully address emergencies or events that might lead to instability or Cascading: Reliability Directive: A communication initiated by a Reliability Coordinator, Transmission Operator or Balancing Authority where action by the recipient is necessary to address an Emergency or Adverse Reliability Impact. Do you agree with the proposed definition? If not, please explain in the comment area below. 76
6. Do you have any other comment, not expressed in questions above, for the RC SDT?..... 96

The Industry Segments are:

- 1 — Transmission Owners
- 2 — RTOs, 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, Regional Entities

Group/Individual		Commenter	Organization	Registered Ballot Body Segment										
				1	2	3	4	5	6	7	8	9	10	
1.	Group	Gerald Beckerle	SERC OC Standards Review Group	X		X								
Additional Member Additional Organization Region Segment Selection														
1.	Mike Hirst	Cogentrix	SERC	5										
2.	Jeff Harrison	AECI	SERC	1, 3, 5, 6										
3.	Sam Holeman	Duke Energy	SERC	1, 3, 5, 6										
4.	Michael Belle	SCE&G	SERC	1, 3, 5, 6										
5.	Bob Dalrymple	TVA	SERC	1, 3, 5, 6										
6.	Joel Wise	TVA	SERC	1, 3, 5, 6										
7.	Jake Miller	Dynegy	SERC	5										
8.	Robert Thomasson	BREC	SERC	1										
9.	Alvis Lanton	SIPC	SERC	1										
10.	Tim Hattaway	PowerSouth	SERC	1, 5										
11.	Shardra Scott	Southern	SERC	1, 5										
12.	Greg Stone	Duke Energy	SERC	1, 3, 5, 6										
13.	Tom Burns	PJM	SERC	2										

Group/Individual	Commenter	Organization	Registered Ballot Body Segment												
			1	2	3	4	5	6	7	8	9	10			
14. Steve Corbin	SERC Reliability Corp.	SERC 10													
15. Brad Young	LGE/KU	SERC 3													
16. Wayne Van Liere	LGE/KU	SERC 3													
17. Gary Hutson	SMEPA	SERC 1, 3, 4, 5													
18. Scott Brame	NCEMC	SERC 1, 3, 4, 5													
19. Devan Hoke	SERC Reliability Corp.	SERC 10													
20. Jim Case	Entergy	SERC 1, 3, 6													
21. William Berry	OMU	SERC 3, 5													
22. John Troha	SERC Reliability Corp.	SERC 10													
2. Group	Ron Sporseen	Pacific Northwest Generating Cooperative	X		X	X						X			
Additional Member Additional Organization Region Segment Selection															
1. Bud Tracy	Blachly-Lane Electric Cooperative	WECC 3													
2. Dave Markham	Central Electric Cooperative	WECC 3													
3. Dave Hagen	Clearwater Power Company	WECC 3													
4. Roman Gillen	Consumers Power Inc.	WECC 1, 3													
5. Roger Meader	Coos-Curry Electric Cooperative	WECC 3													
6. Dave Sabala	Douglas Electric Cooperative	WECC 8													
7. Bryan Case	Fall River Electric Cooperative	WECC 3													
8. Rick Crinklaw	Lane Electric Cooperative	WECC 3													
9. Ray Ellis	Lincoln Electric Cooperative	WECC 8													
10. Annie Terracciano	Northern Lights Inc.	WECC 3													
11. David Gottula	Okanogan Electric Cooperative	WECC 8													
12. Aleka Scott	PNGC Power	WECC 4													
13. Heber Carpenter	Raft River Electric Cooperative	WECC 3													
14. Steve Eldrige	Umatilla Electric Cooperative	WECC 1, 3													
15. Marc Farmer	West Oregon Electric Cooperative	WECC 4													
16. Margaret Ryan	PNGC Power	WECC 8													
3. Group	Guy Zito	Northeast Power Coordinating Council													X
Additional Member Additional Organization Region Segment Selection															
1. Alan Adamson	New York State Reliability Council, LLC	NPCC 10													
2. Greg Campoli	New York Independent System Operator	NPCC 2													

Group/Individual	Commenter	Organization	Registered Ballot Body Segment																	
			1	2	3	4	5	6	7	8	9	10								
3.	Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1																
4.	Chris de Graffenried	Consolidated Edison Co. of New York, Inc.	NPCC	1																
5.	Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10																
6.	Brian Evans-Mongeon	Utility Services	NPCC	8																
7.	Mike Garton	Dominion Resources Services, Inc.	NPCC	5																
8.	Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3																
9.	Chantel Haswell	FPL Group, Inc.	NPCC	5																
10.	David Kiguel	Hydro One Networks Inc.	NPCC	1																
11.	Michael R. Lombardi	Northeast Utilities	NPCC	1																
12.	Randy MacDonald	New Brunswick Power Transmission	NPCC	9																
13.	Bruce Metruck	New York Power Authority	NPCC	6																
14.	Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10																
15.	Robert Pellegrini	The United Illuminating Company	NPCC	1																
16.	Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1																
17.	David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5																
18.	Saurabh Saksena	National Grid	NPCC	1																
19.	Michael Schiavone	National Grid	NPCC	1																
20.	Wayne Sipperly	New York Power Authority	NPCC	5																
21.	Tina Teng	Independent Electricity System Operator	NPCC	2																
22.	Donald Weaver	New Brunswick System Operator	NPCC	2																
23.	Ben Wu	Orange and Rockland Utilities	NPCC	1																
4.	Group	Will Smith	MRO NSRF		X	X	X	X	X	X										X
Additional Member Additional Organization Region Segment Selection																				
1.	Mahmood Safi	OPPD	MRO	1, 3, 5, 6																
2.	Chuck Lawrence	ATC	MRO	1																
3.	Tom Webb	WPS	MRO	3, 4, 5, 6																
4.	Jodi Jenson	WAPA	MRO	1, 6																
5.	Ken Goldsmith	ALTW	MRO	4																
6.	Alice Ireland	XCEL/NSP	MRO	1, 3, 5, 6																
7.	Dave Rudolph	BEPC	MRO	1, 3, 5, 6																
8.	Eric Ruskamp	LES	MRO	1, 3, 5, 6																
9.	Joe DePoorter	MGE	MRO	3, 4, 5, 6																

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10. Scott Nickels	RPU	MRO	4																																																									
11. Terry Harbour	MEC	MRO	3, 5, 6, 1																																																									
12. Marie Knox	MISO	MRO	2																																																									
13. Lee Kittelson	OTP	MRO	1, 3, 4, 5																																																									
14. Scott Bos	MPW	MRO	1, 3, 5, 6																																																									
15. Tony Eddleman	NPPD	MRO	1, 3, 5																																																									
16. Mike Brytowski	GRE	MRO	1, 3, 5, 6																																																									
17. Richard Burt	MPC	MRO	1, 3, 5, 6																																																									
5.	Group	Claire Lloyd	City of Tacoma, Department of Public Utilities, Light Division, dba Tacoma Power	X		X	X	X	X																																																			
No additional members listed.																																																												
6.	Group	Brenda Powell	CCG, CPG, CECD						X																																																			
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9.		RFC	6																																																									
10.		SERC	6																																																									
7.	Group	Brent Ingebrigtsen	LG&E and KU Services Company	X		X		X	X																																																			
No additional members listed.																																																												
8.	Group	Chris Higgins	Bonneville Power Administration	X		X		X	X																																																			
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2. Paul	Blake	WECC	1																																																									
3. Ted	Snodgrass	WECC	1																																																									
9.	Group	Annette M. Bannon	PPL Electric Utilities and PPL Supply NERC	X				X	X																																																			

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		Registered Organizations													
Additional Member Additional Organization Region Segment Selection															
1.	Annette Bannon	PPL Generation, LLC on behalf of NERC Registered Entities	RFC	5											
2.			WECC	5											
3.	Mark Heimbach	PPL EnergyPlus, LLC	MRO	6											
4.			NPCC	6											
5.			RFC	6											
6.			SERC	6											
7.			SPP	6											
8.			WECC	6											
9.	Brenda Truhe	PPL Electric Utilities Corp.	RFC	1											
10.	Group	Robert Rhodes	SPP Standards Review Group			X	X	X	X	X	X				
Additional Member Additional Organization Region Segment Selection															
1.	John Allen	City Utilities of Springfield	SPP	1, 4											
2.	Michelle Corley	CLECO Power	SPP	1, 3, 5											
3.	Jonathan Hayes	Southwest Power Pool	SPP	2											
4.	Allen Klassen	Westar Energy	SPP	1, 3, 5, 6											
5.	Terri Pyle	Oklahoma Gas & Electric	SPP	1, 3, 5											
11.	Group	Mike Garton	Dominion			X		X		X	X				
Additional Member Additional Organization Region Segment Selection															
1.	Michael Gildea	Dominion Resource Services, Inc.	NPCC	5, 6											
2.	Louis Slade	Dominion Resource Services, Inc.	RFC	5, 6											
3.	Connie Lowe	Dominion Resource Services, Inc.	MRO	5, 6											
4.	Michael Crowley	Virginia Electric and Power Company	SERC	1											
12.	Group	Steve Rueckert	Western Electricity Coordinating Council												X
No additional members listed.															
13.	Group	Emily Pennel	Southwest Power Pool Regional Entity												X
No additional members listed.															
14.	Group	Sam Ciccone	FirstEnergy			X		X	X	X	X				
Additional Member Additional Organization Region Segment Selection															

Group/Individual	Commenter	Organization	Registered Ballot Body Segment																	
			1	2	3	4	5	6	7	8	9	10								
1. John Reed	FE	RFC	1																	
2. Mark Pavlick	FE	RFC	1, 3, 4, 5, 6																	
3. Doug Hohlbaugh	FE	RFC	1, 3, 4, 5, 6																	
4. Brian Orians	FE	RFC	5																	
5. Bill Duge	FE	RFC	5																	
6. Kevin Querry	FE	RFC	5																	
15. Group	Marie Knox	MISO Standards Collaborators		X																
Additional Member Additional Organization Region Segment Selection																				
1. Jim Cyrulewski	JDRJC Associates, LLC	RFC	8																	
2. Barb Kedrowski	We Energies	RFC	3, 4, 5																	
3. Joe O'Brien	NIPSCO	RFC	1, 3, 5, 6																	
16. Group	Frank Gaffney	Florida Municipal Power Agency		X		X	X	X	X											
Additional Member Additional Organization Region Segment Selection																				
1. Timothy Beyrle	City of New Smyrna Beach	FRCC	4																	
2. Jim Howard	Lakeland Electric	FRCC	3																	
3. Greg Woessner	Kissimmee Utility Authority	FRCC	3																	
4. Lynne Mila	City of Clewiston	FRCC	3																	
5. Joe Stonecipher	Beaches Energy Services	FRCC	1																	
6. Cairo Vanegas	Fort Pierce Utility Authority	FRCC	4																	
7. Randy Hahn	Ocala Utility Services	FRCC	3																	
17. Group	Mary Jo Cooper	Global Engineering and Energy Solutions				X														
Additional Member Additional Organization Region Segment Selection																				
1. Colin Murphey	City of Ukiah	WECC	3																	
2. Elizabeth Kirkley	City of Lodi	WECC	3																	
3. Salmon River Electric Coop	Salmon River Electric Coop	WECC	3																	
18. Group	Jason Marshall	ACES Power Marketing Standards Collaborators								X										
Additional Member Additional Organization Region Segment Selection																				
1. Mark Ringhausen	Old Dominion Electric Cooperative	SERC	3, 4																	
2. Susan Sosbe	Wasbash Valley Power Association	RFC	3																	
19. Group	Michael Gammon	Kansas City Power & Light		X		X		X	X											

Group/Individual	Commenter	Organization	Registered Ballot Body Segment										
			1	2	3	4	5	6	7	8	9	10	
Additional Member Additional Organization Region Segment Selection													
1.	Jessi Tucker	Kansas City Power & Light	SPP	1, 3, 5, 6									
2.	Brett Holland	Kansas City Power & Light	SPP	1, 3, 5, 6									
20.	Individual	Chris Chavez	Salt River Project	X		X		X	X				
21.	Individual	Janet Smith, Regulatory Affairs Supervisor	Arizona Public Service Company	X		X		X	X				
22.	Individual	Antonio Grayson	Southern Company	X		X		X	X				
23.	Individual	Jennifer Wright	San Diego Gas & Electric	X		X		X					
24.	Individual	Steve Alexanderson	Central Lincoln			X	X					X	
25.	Individual	Paul Kerr	Shell Energy North America						X				
26.	Individual	Keira Kazmerski	Xcel Energy	X		X		X	X				
27.	Individual	Edward J Davis	Entergy Services, Inc	X		X		X	X				
28.	Individual	Michael Falvo	Independent Electricity System Operator		X								
29.	Individual	Si Truc PHAN	Hydro-Quebec TransEnergie	X									
30.	Individual	Daniel Duff	Liberty Electric Power LLC					X					
31.	Individual	Joe O'Brien	NIPSCO	X		X		X	X				
32.	Individual	Darryl Curtis	Oncor Electric Delivery Company LLC	X									
33.	Individual	Chris de Graffenried	Consolidated Edison Co. of NY, Inc.	X		X		X	X				
34.	Individual	Anthony Jankowski	We Energies			X	X	X					
35.	Individual	J. S. Stonecipher, PE	City of Jacksonville Beach dba/ Beaches Energy Services	X								X	
36.	Individual	Scott Berry	Indiana Municipal Power Agency				X						
37.	Individual	Jeff Longshore	Luminant Energy Company LLC						X				
38.	Individual	Brian J. Murphy	NextEra Energy, Inc.	X		X		X	X				
39.	Individual	David Thorne	Pepco Holdings Inc.	X		X							
40.	Individual	John Bee	Exelon	X		X		X					
41.	Individual	Joe Petaski	Manitoba Hydro	X		X		X	X				

Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
42.	Individual	Michael Brytowski	Great River Energy	X		X		X	X				
43.	Individual	David Burke	Orange and Rockland Utilities, Inc.	X		X							
44.	Individual	Michael Schiavone	Niagara Mohawk (dba National Grid)			X							
45.	Individual	Thad Ness	American Electric Power	X		X		X	X				
46.	Individual	RoLynda Shumpert	South Carolina Electric and Gas	X		X		X	X				
47.	Individual	Jason Snodgrass	Georgia Transmission Corporation	X									
48.	Individual	Bill Keagle	BGE	X									
49.	Individual	Don Schmit	Nebraska Public Power District	X		X		X					
50.	Individual	Neil Phinney	Georgia System Operations			X	X						
51.	Individual	Michelle D'Antuono	Ingleside Cogeneration LP					X					
52.	Individual	Greg Rowland	Duke Energy	X		X		X	X				
53.	Individual	Kathleen Goodman	ISO New England		X								
54.	Individual	H. Steven Myers	ERCOT ISO		X								
55.	Individual	Anthony Jablonski	ReliabilityFirst										X
56.	Individual	Randall McCamish	City of Vero Beach	X		X						X	
57.	Individual	Rich Salgo	NV Energy	X		X		X					
58.	Individual	Rebecca Moore Darrah	Midwest Independent Transmission System Operator		X								
59.	Individual	Don Jones	Texas Reliability Entity										X
60.	Individual	David Kiguel	Hydro One Networks Inc.	X		X							
61.	Individual	Gregory Campoli	New York Independent System Operator		X								
62.	Individual	Andrew Z. Pusztai	American Transmission Company, LLC	X									

1. The RCSDT has revised the applicability of the standards and implementation plans by aligning COM-001-2, COM-002-3 and IRO-001-3 to apply to the same entities and by removing LSE, PSE and TSP as applicable entities from the COM standards. Additionally, the Interchange Coordinator has been removed as an applicable entity from the standards. Do you agree with this change in applicability to the three standards? If not, please explain in the comment area below.

Summary Consideration: Most commenters agreed with removing the LSE, PSE, and TSP from the three standards. Some did not agree with keeping the Distribution Provider (DP) within the standards. The RCSDT in being responsive to the FERC directive in Order No. 693, Paragraph 487, considered the DP entity; however, concluded having the DP is appropriate in responding to the directive to allow for reliable operations in normal and emergency situations. In reference to the implementation for DPs and GOPs, the RCSDT believes there is not a significant burden for most DP and GOP entities to implement an Interpersonal Communication capability. Some comments referenced the NERC Functional Model V5 concerning DP and GOP entities; however, the model is clear on the basic activities and supports the DP and GOP being applicable to the standards. The model also supports the removal of LSEs, for example. The RCSDT did not modify the applicability of the standards with regard to functional entities.

Organization	Yes or No	Question 1 Comment
ACES Power Marketing Standards Collaborators	No	While we agree with removing LSE, PSE, and TSP, we do not agree with the need to include Distribution Provider in all the standards. For example, in IRO-001-3, the Distribution Provider will likely never receive a Reliability Directive directly from its Reliability Coordinator. More likely, the Reliability Directive will be issued by the Transmission Operator or Balancing Authority depending on if the issue is security or adequacy related.
<p>Response: The RCSDT is addressing a FERC directive (P487, Order 693) to include the DP in COM-001, and the RCSDT has included the DP in COM-002 and IRO-001 applicability because these standards are related to reliability communications. The RCSDT agrees with the point that communication will most likely be from the BA or TOP; however, the communications may come from the RC. No change made.</p>		
Entergy Services, Inc	No	R3 adds additional responsibilities for the TOP to have Interpersonal Communications capability with EACH DP and GOP in its footprint. Similarly, R4 gives the TOP responsibility to have alternative

Organization	Yes or No	Question 1 Comment
		<p>communications capability with each of these entities. This is a significant additional responsibility for the TOP to document and perhaps arrange for additional means of communication with these entities.</p> <p>The RCSDT is addressing a FERC directive (P487, Order 693) to include the DP and GOP. The intent is to have Interpersonal Communication capability with the DP and GOP, and not to build additional communication facilities, but to be able “to interact, consult, or exchange information.” In contrast to R3, R4 does not include the DP or GOP. No change made.</p> <p>The short time frame provided for implementation of these requirements is not consistent with the additional effort and compliance documentation that is necessary to implement these requirements. Entergy recommends that the implementation time frame for these new requirements that apply to new entities, or expand the application of COM-001 for existing entities have an effective date 12 months beyond the applicable regulatory approval.</p> <p>Additionally, the implementation of the requirements that apply to the DP and GOP will represent an increase in the amount of documentation that must be retain to demonstrate compliance, and in some cases may also result in their having to purchase equipment or install new alternate means of communication.</p> <p>The RCSDT believes that six months is adequate, considering additional facilities should not have to be built to establish communications with the DP and GOP; similarly, compliance documentation should not impose significant work on the entities part. No change made.</p> <p>What is the improvement in reliability expected as a result of these new requirements?</p> <p>The expected reliability result is addressed in the FERC directive (P487, Order 693), “...ensure there is no reliability gap during normal and</p>

Organization	Yes or No	Question 1 Comment
		<p>emergency operations. For example, during a blackstart when normal communications may be disrupted, it is essential that the Transmission Operator, Balancing Authority and Reliability Coordinator maintain communications with their Distribution Providers and Generator Operators.” No change made.</p>
<p>Response: See response above.</p>		
<p>Independent Electricity System Operator</p>	<p>No</p>	<p>In COM-001, we commented earlier that the entities in R4 and R6 (now R5 and R6) should be the same, i.e. the BA needs to have the Interpersonal Communication capability as well as the Alternative Interpersonal Communication capability with the same entities. The SDT’s response indicates that the suggested change is not needed since additionally requiring DP and GOP entities to have Alternative Interpersonal Communication capability would impose more cost on smaller DP and GOP entities that have little or no risk impact to the bulk electric system.</p> <p>We disagree with this assessment since the need to have Alternative Interpersonal Communication capability should be assessed from the viewpoint that whether or not the absence of such capability can adversely affect reliability. If Interpersonal Communication capability is needed between a BA and a DP/GOP to communicate reliability instructions or directives, then it is deemed necessary that such communication be provided at all times, which indicates the need for an alternative capability.</p> <p>We once again urge the SDT to make the list of entities in R5 and R6 to be the same.</p>
<p>Response: The RCSDT asserts the standard meets FERC Order 693 regarding DP and GOP entities by requiring these entities to have Interpersonal Communication capability. Additionally, requiring DP and GOP entities to have Alternative Interpersonal Communication capability only imposes more cost on smaller DP and GOP entities that have little or no risk impact to the Bulk Electric System. No change made.</p>		

Organization	Yes or No	Question 1 Comment
Georgia System Operations	No	<p>While we agree with removing LSE, PSE, and TSP, we do not agree with the need to include Distribution Provider in all the standards. For example, in IRO-001-3, the Distribution Provider will likely never receive a Reliability Directive directly from its Reliability Coordinator. More likely, the Reliability Directive will be issued by the Transmission Operator or Balancing Authority depending on if the issue is security or adequacy related.</p> <p>The RCSDT is addressing a FERC directive (P487, Order 693) to include the DP in COM-001, and the RCSDT has included the DP in COM-002 and IRO-001 applicability because these standards are related to reliability communications. The RCSDT agrees with the point that communication will most likely be from the BA or TOP; however, the communications may come from the RC. No change made.</p> <p>Accordingly, NERC’s Reliability Functional Model V5² describes and identifies the DP’s relationships with other Functional Entities to the TOP and BA with respect to Real Time.</p> <p>Real Time³</p> <p>7. Implements voltage reduction and sheds load as directed by the Transmission Operator or Balancing Authority.</p> <p>8. Implements system restoration plans as coordinated by the Transmission Operator.</p> <p>9. Directs Load-Serving Entities to communicate requests for voluntary load curtailment.</p> <p>With respect to the Functional Model V5, please see Page 31, “18. Issues</p>

² NERC Functional Model Version 5, (http://www.nerc.com/files/Functional_Model_V5_Final_2009Dec1.pdf)

³ NERC Functional Model Version 5, “Functional Entity – Distribution Provider,” pg 47, (http://www.nerc.com/files/Functional_Model_V5_Final_2009Dec1.pdf)

Organization	Yes or No	Question 1 Comment
		corrective actions and emergency procedures directives (e.g., curtailments or load shedding) to Transmission Operators, Balancing Authorities, Generator Operators, Distribution Providers, and Interchange Coordinators.” No change made.
Response: See response above.		
ERCOT ISO	No	Some concern for removal of LSE in particular from R2 and R3 from current IRO-001-2 R7 for the ERCOT region. ERCOT Region has QSE’s ⁴ that manage Load Resources. There may be some QSEs that are not registered as a GOP that deploy Load Resources. Per the current LSE JRO, QSEs with Load Resources are registered as LSEs. Not requiring them to deploy Load Resource directives could be perceived as a reliability gap created from previous version to this version. PSEs could be removed as long as they fall under BA authority.
Response: The RCSDT believes the DP is the correct entity because the LSE does not own assets. The definition of LSE is, “The functional entity that secures energy and transmission service (and reliability related services) to serve the electrical demand and energy requirements of its end use customers.” In contrast, the definition of a DP is, “The functional entity that provides facilities that interconnect an End-use Customer load and the electric system for the transfer of electrical energy to the End-use Customer.” Additionally, the Functional Model V5 demonstrates this under the Reliability Coordinator, “18. Issues corrective actions and emergency procedures directives (e.g., curtailments or load shedding) to Transmission Operators, Balancing Authorities, Generator Operators, Distribution Providers, and Interchange Coordinators.” No change made.		
City of Green Cove Springs	Affirmative	COM-001-2: In R5.3, should a BA have communications with a DP or LSE? For the TOP, it is the DP because the load influence is very local; however, for a BA the supply / demand balance is not local and in markets that allow retail competition, I'm thinking LSE is the right functional entity. For Florida,

⁴ Qualifying Scheduling Entities, (<http://www.ercot.com/services/rq/qse/>)

Organization	Yes or No	Question 1 Comment
		<p>it doesn't really matter. If the LSE is the "correct" entity, then R7 would need to be changed and a new requirement specific to LSE's would need to be added.</p> <p>The RCSDT believes the DP should be included and that the LSE should not because the Functional Model V5 addresses this case. See Page 47, "Distribution Provider," of the Functional Model V5, Item 9. "Directs Load-Serving Entities to communicate requests for voluntary load curtailment." The DP is the asset owner and would direct the LSE to perform actions. No change made.</p> <p>COM-001-2, R9 – "Each ... shall test its Alternative Interpersonal Communications capability", suggest adding the phrase "to each entity for which Alternative Interpersonal Communications is required" to add clarity.</p> <p>The RCSDT believes the additional phrasing has little value to the overall requirement. The requirement specifically applies to those responsible entities listed, and it further aligns with R2, R4 and R6. No change made.</p>
<p>Response: See response above.</p>		
<p>Beaches Energy Services</p>	<p>Affirmative</p>	<p>COM-001-2: In R5.3, should a BA have communications with a DP or LSE? For the TOP, it is the DP because the load influence is very local; however, for a BA the supply/demand balance is not local and in markets that allow retail competition, I'm thinking LSE is the right functional entity. For Florida, it doesn't really matter. If the LSE is the "correct" entity, then R7 would need to be changed and a new requirement specific to LSE's would need to be added.</p>
<p>Response: The RCSDT believes the DP should be included and not the LSE because the Functional Model V5 addresses this case. See Page 47, "Distribution Provider," of the Functional Model V5, Item 9. "Directs Load-Serving Entities to communicate requests for voluntary load curtailment." With regard to R7, the DP is the asset owner and would direct the LSE to perform actions. No</p>		

Organization	Yes or No	Question 1 Comment
change made.		
MISO Standards Collaborators	Yes	<p>(1) In COM-001, the entities in R4 and R6 (now R5 and R6) should be the same, i.e. the BA needs to have the Interpersonal Communication capability as well as the Alternative Interpersonal Communication capability with the same entities. Although the need to have Alternative Interpersonal Communication capability should be assessed from the viewpoint that whether or not the absence of such capability can adversely affect reliability, the proposed standard does not require the capability in all cases. At the same time, this standard does not preclude such capability. Even though Interpersonal Communication capability is needed between a BA and a DP/GOP to communicate reliability instructions or directives, there are other communications paths which can be used in the case of the loss of that capability.</p> <p>Since TOPs are also required to have the capability, the BA can call the TOP and ask the TOP to contact the DP/GOP for them until they can implement capability. In addition, it is difficult to visualize entities which would not have the public telephone system or even cell phones available for use in the event of the loss of the capability.</p>
<p>Response: The RCSDT stresses the standard meets FERC Order 693 regarding DP and GOP entities by requiring these entities to have Interpersonal Communication capability. Additionally, requiring DP and GOP entities to have Alternative Interpersonal Communication capability only imposes more cost on smaller DP and GOP entities that have little or no risk impact to the Bulk Electric System. No change made.</p>		
Florida Municipal Power Agency	Yes	<p>In COM-001-2 R5.3, should a BA have communications with a DP or LSE? For the TOP, it is the DP because the load influence is very local; however, for a BA the supply / demand balance is not local and in markets that allow retail competition, it may be that the LSE is the more appropriate functional entity. For instance, the Functional Model when discussing LSE on page 55</p>

Organization	Yes or No	Question 1 Comment
		<p>states that one of the LSE’s real time duties is: “12. Receives requests from the Balancing Authority and Distribution Provider for voluntary load curtailment.”⁵</p> <p>The RCSDT believes the DP should be included and not the LSE because the Functional Model V5 addresses this case. See Page 47, “Distribution Provider,” of the Functional Model V5, Item 9. “Directs Load-Serving Entities to communicate requests for voluntary load curtailment.” In this case (COM-001), the load curtailment is voluntary and would generally be for economics, the exchange of operating information and not reliability actions. No change made.</p> <p>If the LSE is the more appropriate entity, then R7 would need to be changed and a new requirement specific to LSE's would need to be added.</p> <p>For Florida, which does not have retail competition, it doesn’t matter whether the DP or the LSE is more appropriate; hence, the “yes” answer.</p> <p>With regard to R7, the DP is the asset owner and would direct the LSE to perform actions. No change made.</p>
<p>Response: See response above.</p>		
<p>Georgia Transmission Corporation</p>	<p>Yes</p>	<p>While we agree with removing LSE, PSE, and TSP, we do not agree with the need to include Distribution Provider in all the standards. For example, in IRO-001-3, the Distribution Provider will likely never receive a Reliability Directive directly from its Reliability Coordinator. Reliability Directives received by Distribution Providers will be issued by the Transmission Operator or Balancing Authority depending on if the issue is security or adequacy related. Accordingly, NERC’s Reliability Functional Model V5</p>

⁵ NERC Functional Model Version 5, “Functional Entity – Load Serving Entity,” pg 55, (http://www.nerc.com/files/Functional_Model_V5_Final_2009Dec1.pdf)

Organization	Yes or No	Question 1 Comment
		<p>describes and identifies the DP’s relationships with other Functional Entities to the TOP and BA with respect to Real Time.</p> <p>Real Time⁶</p> <p>7. Implements voltage reduction and sheds load as directed by the Transmission Operator or Balancing Authority.</p> <p>8. Implements system restoration plans as coordinated by the Transmission Operator.</p> <p>9. Directs Load-Serving Entities to communicate requests for voluntary load curtailment.</p> <p>The RCSDT is addressing a FERC directive (P487, Order 693) to include the DP in COM-001, and the RCSDT has included the DP in COM-002 and IRO-001 applicability because these standards are related to reliability communications. The RCSDT agrees with the point that communication will most likely be from the BA or TOP; however, the communications may come from the RC. With respect to the Functional Model V5, please see Page 31, “18. Issues corrective actions and emergency procedures directives (e.g., curtailments or load shedding) to Transmission Operators, Balancing Authorities, Generator Operators, Distribution Providers, and Interchange Coordinators.” No change made.</p> <p>Lastly, we believe that Distribution Providers requirements with respect to complying with Reliability Directives received by TOPs and BAs are adequately covered by Reliability Standards TOP-001 and COM-002.</p> <p>The RCSDT agrees that TOP-001 and COM-002 apply to DP complying with Reliability Directives; however, IRO-001 applies to having the authority to act or direct others act and may not necessarily be done by issuing a</p>

⁶ NERC Functional Model Version 5, “Functional Entity – Distribution Provider,” pg 47, (http://www.nerc.com/files/Functional_Model_V5_Final_2009Dec1.pdf)

Organization	Yes or No	Question 1 Comment
		Reliability Directive. No change made.
Response: See response above.		
Ingleside Cogeneration LP	Yes	Ingleside Cogeneration LP believes that the intent of these three standards is to ensure reliable normal and emergency communications between BES operating entities. It should be the rare exception that BES-critical information must be communicated directly to an LSE, PSE, and TSP and IC. The impact of the Standards would be lessened if diffusely applied to multiple entities who do not normally engage in operations communications.
Response: Thank you for your comment.		
City of Vero Beach	Yes	<p>In COM-001-2 R5.3, should a BA have communications with a DP or LSE? For the TOP, it is the DP because the load influence is very local; however, for a BA the supply / demand balance is not local and in markets that allow retail competition, it may be that the LSE is the more appropriate functional entity. For instance, the Functional Model when discussing LSE on page 55 states that one of the LSE’s real time duties is:</p> <p>“12. Receives requests from the Balancing Authority and Distribution Provider for voluntary load curtailment.”⁷</p> <p>The RCSDT notes that the LSE should not be included because the Functional Model V5 addresses this case. See Page 47, “Distribution Provider,” of the Functional Model V5, Item 9. “Directs Load-Serving Entities to communicate requests for voluntary load curtailment.” No change made.</p>

⁷ NERC Functional Model Version 5, “Functional Entity – Load Serving Entity,” pg 55, (http://www.nerc.com/files/Functional_Model_V5_Final_2009Dec1.pdf)

Organization	Yes or No	Question 1 Comment
		<p>If the LSE is the more appropriate entity, then R7 would need to be changed and a new requirement specific to LSE's would need to be added.</p> <p>For Florida, which does not have retail competition, it doesn't matter whether the DP or the LSE is more appropriate; hence, the "yes" answer.</p> <p>With regard to R7, the DP is the asset owner and directs the LSE to perform actions. No change made.</p>
<p>Response: See response above.</p>		
SERC OC Standards Review Group	Yes	
Pacific Northwest Generating Cooperative	Yes	
MRO NSRF	Yes	
City of Tacoma, Department of Public Utilities, Light Division, dba Tacoma Power	Yes	
LG&E and KU Services Company	Yes	
Bonneville Power Administration	Yes	
SPP Standards Review Group	Yes	
Dominion	Yes	
Western Electricity Coordinating Council	Yes	

Organization	Yes or No	Question 1 Comment
Southwest Power Pool Regional Entity	Yes	
FirstEnergy	Yes	
Global Engineering and Energy Solutions	Yes	
Kansas City Power & Light	Yes	
Salt River Project	Yes	
Southern Company	Yes	
San Diego Gas & Electric	Yes	
Central Lincoln	Yes	
Shell Energy North America	Yes	
Xcel Energy	Yes	
Liberty Electric Power LLC	Yes	
NIPSCO	Yes	
Oncor Electric Delivery Company LLC	Yes	
Consolidated Edison Co. of NY, Inc.	Yes	
We Energies	Yes	

Organization	Yes or No	Question 1 Comment
Luminant Energy Company LLC	Yes	
NextEra Energy, Inc.	Yes	
Pepco Holdings Inc.	Yes	
Exelon	Yes	
Manitoba Hydro	Yes	
Great River Energy	Yes	
Orange and Rockland Utilities, Inc.	Yes	
Niagara Mohawk (dba National Grid)	Yes	
American Electric Power	Yes	
South Carolina Electric and Gas	Yes	
BGE	Yes	
Nebraska Public Power District	Yes	
Duke Energy	Yes	
ISO New England	Yes	
ReliabilityFirst	Yes	
NV Energy	Yes	

Organization	Yes or No	Question 1 Comment
Midwest Independent Transmission System Operator	Yes	
Texas Reliability Entity	Yes	
Hydro One Networks Inc.	Yes	
New York Independent System Operator	Yes	
American Transmission Company, LLC	Yes	
City of Jacksonville Beach dba/ Beaches Energy Services		<p>In R5.3, should a BA have communications with a DP or LSE? For the TOP, it is the DP because the load influence is very local; however, for a BA the supply/demand balance is not local and in markets that allow retail competition, I'm thinking LSE is the right functional entity. For Florida, it doesn't really matter. If the LSE is the "correct" entity, then R7 would need to be changed and a new requirement specific to LSE's would need to be added</p>
<p>Response: The RCSDT notes that the LSE not should be included because the Functional Model V5 addresses this case. See Page 47, "Distribution Provider," of the Functional Model V5, Item 9. "Directs Load-Serving Entities to communicate requests for voluntary load curtailment." With regard to R7, the DP is the asset owner and directs the LSE to perform actions. No change made.</p>		
Indiana Municipal Power Agency		No comment.

2. Do you agree with the addition of “Adjacent” entities in COM-001-2, Parts 3.5, 4.3, 5.5 and 6.3 of COM-001-2? If not, please explain in the comment area below.

Summary Consideration: The majority of comments were regarding COM-001-2, R3 and R4. Concerns included issues with the use of “Adjacent Transmission Operators” and “synchronously connected within the same Interconnection.” The capitalized word “Adjacent,” beginning the requirement gives the appearance of an undefined glossary term. Therefore, the RCSDT addressed this by starting the applicable Parts of those requirements with “Each” to form “Each adjacent Transmission Operator...” and avoiding the need for another glossary term for something that is widely understood within the industry. The RCSDT made an additional clarifying change to address the issue that some Transmission Operators may not be adjacent for situations other than synchronously connected within the same Interconnection in the traditional understanding. For example, some entities have connections beyond the interconnection and some connections are asynchronous. To address this concern, the RCSDT separated the requirements to identify “synchronously connected” and “asynchronously connected,” and removed the “within the same Interconnection” criteria. Other minor formatting and reference errors were noted and corrected.

Organization	Yes or No	Question 2 Comment
SERC OC Standards Review Group	No	<p>We are concerned regarding communications between Transmission Operators on opposite ends of DC ties, which may or may not be in the same interconnection.</p> <p>Similarly, COM-001, R1.2 limits the requirement of adjacent Reliability Coordinators to the same interconnection and this should not be limited to the same interconnection whether it is synchronous or non-synchronous.</p> <p>The measures should also be verified to ensure that they align properly with the final requirements.</p>
<p>Response: The RCSDT has made clarifying changes by adding a Part to R3 and R4 to address asynchronous connections between Transmission Operators, and has eliminated the phrase “within the same interconnection.” See change in COM-001-2, R3 and R4. Requirement R1 addresses a reliability need for adjacent Reliability Coordinators synchronously connected within the same Interconnection to have Interpersonal Communication capability; however, it does not preclude or limit the Reliability Coordinator from establishing Interpersonal Communication capability with others. The RCSDT does not see where there is a need to communicate with other Reliability Coordinator’s from one interconnection to another. No change made.</p>		

Organization	Yes or No	Question 2 Comment
Northeast Power Coordinating Council	No	<p>NERC uses the terms “adjacent” and “neighboring” in various standards. It is generally believed that those terms have the same meanings, but there are those who believe those terms, as used, are intended to have different meanings. To ensure a consistent usage and understanding, the definition of the term adjacent must be made known before its addition to the standard. Consideration should be given to using only one term in all standards if adjacent and neighboring are intended to mean the same thing. Both terms are used in NERC Standards, sometimes both in the same standard. For example, EOP-001-2b uses “neighboring” in R5, and “adjacent” in R3.3.</p>
<p>Response: The RCSDT thanks you for your comment and recognizes the confusion created by having “Adjacent” start the sentence. This gave the appearance of a defined NERC glossary term. The RCSDT has made clarify changes to the requirements and measures to eliminate this problem. See changes to COM-001-2, R1.2, R2.2, R3.5, R4.3, R5.5, and R6.3.</p>		
MRO NSRF	No	<p>NERC has formally defined “Adjacent Balancing Authority” in the NERC Glossary of Terms, but not “Adjacent Transmission Operator.” The MRO NSRF recommends that “Adjacent Transmission Operator” be defined similar to the “Adjacent Balancing Authority” definition in the NERC Glossary of Terms.</p>
<p>Response: The RCSDT thanks you for your comment and recognizes the confusion created by having “Adjacent” start the sentence. This gave the appearance of a defined NERC glossary term. The RCSDT has made clarify changes to the requirements and measures to eliminate this problem. See changes to COM-001-2, R1.2, R2.2, R3.5, R4.3, R5.5, and R6.3.</p>		
Kansas City Power & Light	No	<p>Requirements R4.3 and R6.3 require TOP’s and BA’s to establish alternative means of “interpersonal communications” with other TOP’s and BA’s without regard to the reliability impact each TOP or BA has on the interconnection. Why would it be necessary for a TOP with one 161kv transmission line or a BA with 100 MW of total load, or one GOP with a 30MW unit to realize additional costs when the facilities they operate have little reliability impact?</p> <p>Rationale criteria should be included here to identify the TOP’s and BA’s where</p>

Organization	Yes or No	Question 2 Comment
		<p>alternative means of “interpersonal communications” should be implemented.</p> <p>Furthermore, these requirements do not recognize the condition when another party refuses to install alternative communication equipment. TOP’s and BA’s have no authority over other TOP’s and BA’s to establish alternative means of communication. Requirements that are dependent on the actions of other parties over which you have no control or authority are poor requirements.</p> <p>In addition, most RC’s have established satellite telephone systems as back-up communication with TOP’s and BA’s. Some RC’s may have to establish additional communication systems with some BA’s as these requirements impose to avoid Standards of Conduct issues.</p>
<p>Response: The RCSDT has not placed any limiting applicability on entities in being responsive to the FERC directive (P487, Order 693), “...ensure there is no reliability gap during normal and emergency operations. For example, during a blackstart when normal communications may be disrupted, it is essential that the Transmission Operator, Balancing Authority and Reliability Coordinator maintain communications with their Distribution Providers and Generator Operators.” The RCSDT does not prescribe the criteria for alternative means of Interpersonal Communication capability, so each entity may determine its own needs to meet the requirement. With regard to requiring other BAs or TOPs to install Alternative Interpersonal Communication capability as registered entities, other BAs or TOPs have the same responsibility to comply with the requirement. Having a satellite backup is an acceptable form of communication; however, the RCSDT does not understand the comment about the Standards of Conduct issues. No change made.</p>		
Southern Company	No	<p>We are concerned regarding communications between Transmission Operators on opposite ends of DC ties, which may or may not be in the same interconnection.</p> <p>Similarly, COM-001, R1.2 limits the requirement of adjacent Reliability Coordinators to the same interconnection and this should not be limited to the same interconnection whether it is synchronous or non-synchronous.</p> <p>The measures should also be verified to ensure that they align properly with the final requirements.</p>
<p>Response: The RCSDT has made clarifying changes by adding Parts to R3 and R4 to address asynchronous connections between</p>		

Organization	Yes or No	Question 2 Comment
<p>Transmission Operators and have eliminated the phrase “within the same interconnection.” See change in COM-001-2, R3 and R4. Requirement R1 addresses a reliability need for adjacent Reliability Coordinators synchronously connected within the same Interconnection to have Interpersonal Communication capability; however, it does not preclude or limit the Reliability Coordinator from establishing Interpersonal Communication capability with others. The RCSDT does not see where there is a need to communicate with other Reliability Coordinators from one Interconnection to another. No change made.</p>		
Xcel Energy	No	<p>In COM-001-2, R4.3. Adjacent Transmission Operators synchronously connected within the same Interconnection. This new requirement has a term that is not defined Adjacent Transmission Operators.</p>
<p>Response: The RCSDT thanks you for your comment and recognizes the confusion created by having “Adjacent” start the sentence. This gave the appearance of a defined NERC glossary term. The RCSDT has made clarifying changes to the requirements and measures to eliminate this problem. See changes to COM-001-2, R1.2, R2.2, R3.5, R4.3, R5.5, and R6.3.</p>		
Independent Electricity System Operator	No	<p>(1) We agree with the addition of “Adjacent” entities in the quoted parts except the qualifier “synchronously connected within the same Interconnection” need to be removed from Parts 3.5 and 4.3 since TOPs do communicate with other TOPs even in another Interconnection (e.g. between Quebec and all of its asynchronously interconnected neighbors). Even in the case of ERCOT, TOPs on the two sides of a DC tie do communicate with each other for daily operations.</p> <p>The RCSDT has made clarifying changes by adding a Part to R3 and R4 to address asynchronous connections between Transmission Operators and has eliminated the phrase “within the same interconnection.” See change in COM-001-2, R3 and R4.</p> <p>(2) Measure M3 does not cover the added R3.5 condition (having Interpersonal Communications capability with each adjacent TOP). M3 needs to be revised.</p> <p>The RCSDT thanks you for catching this oversight. The corresponding TOP entity in R3.5 has been added to the Measure M3.</p>
<p>Response: See response above.</p>		

Organization	Yes or No	Question 2 Comment
Exelon	No	May have an unintended effect on registrations as some GOPs use an intermediately dispatch organization that perform actions on behalf of the generating units.
<p>Response: Having an intermediary dispatching actions for generation units is okay; however, the responsible GOP should have adequate agreements to perform these activities; for example, a Joint Registration Organization (Type 1) or Coordinated Functional Registration (Formerly Type 2). No change made.</p>		
ISO New England	No	<p>ISO-NE does not believe COM-001, in its entirety, is a results-based standards and therefore does not support the draft as written. We believe such "requirements" (i.e. capabilities) should be verified through an entity certification process.</p> <p>Additionally, results-based requirements should be the driver to have the capability to achieve them; on other words, there is no other way to reliably dispatch than to have communications facilities (electronic or voice).</p>
<p>Response: Although this is not a results-based standard, the RCSDT believes it is a significant improvement over the current COM-001 standard. No change made.</p>		
Texas Reliability Entity	No	<p>(1) Requirements R1, R2, R3 and R4 should apply to all adjacent Reliability Coordinators and Transmission Operators, regardless of whether they are in the same Interconnection.</p> <p>The ERCOT Interconnection is asynchronously connected to adjacent Interconnections, and it is imperative that Functional Entities within Texas RE's purview be able to exchange operating information with Transmission Operators and Reliability Coordinators in those adjacent areas, even if they are in a different Interconnection.</p> <p>The RCSDT has made clarifying changes by adding a Part to R3 and R4 to address asynchronous connections between Transmission Operators and has eliminated the phrase "within the same Interconnection." See change in COM-001-2, R3 and R4.</p> <p>(2) Requirement parts R5.5 and R6.3 refer to "Adjacent Balancing Authorities."</p>

Organization	Yes or No	Question 2 Comment
		<p>Measures M5 and M6 refer to “adjacent Balancing Authority” - note the small “a” on adjacent. “Adjacent Balancing Authority” is a defined term in the NERC Glossary, which has a more specific meaning than “adjacent Balancing Authority.” Which term is intended in R5.5 and R6.3? If you don’t intend to use the defined term, perhaps use a word like “contiguous” or “neighboring” rather than “adjacent.”</p> <p>The RCSDT thanks you for your comment and recognizes the confusion created by having “Adjacent” start the sentence. This gave the appearance of a defined NERC glossary term. The RCSDT has made clarifying changes to the requirements and measures to eliminate this problem. See changes to COM-001-2, R1.2, R2.2, R3.5, R4.3, R5.5, and R6.3.</p>
<p>Response: See response above.</p>		
<p>Hydro One Networks Inc.</p>	<p>No</p>	<p>(1) We agree with the addition of “Adjacent” entities in the quoted parts except the qualifier “synchronously connected within the same Interconnection” need to be removed from Parts 3.5 and 4.3 since TOPs do communicate with other TOPs even in another Interconnection (e.g. between Quebec and all of its asynchronously interconnected neighbors). Even in the case of ERCOT, TOPs on the two sides of a DC tie do communicate with each other for daily operations.</p> <p>The RCSDT has made clarifying changes by adding a Part to R3 and R4 to address asynchronous connections between Transmission Operators and has eliminated the phrase “within the same Interconnection.” See change in COM-001-2, R3 and R4.</p> <p>(2) Measure M3 does not cover the added R3.5 condition (having Interpersonal Communications capability with each adjacent TOP). M3 needs to be revised.</p> <p>The RCSDT thanks you for catching this oversight. The corresponding TOP entity in R3.5 has been added to the Measure M3.</p>
<p>Response: See response above.</p>		

Organization	Yes or No	Question 2 Comment
SPP Standards Review Group	Yes	<p>We concur with the addition of “Adjacent” but ask that the SDT give some consideration to allowing an exemption in R6.3 for relatively small loads, less than 20 MW, that are pseudo tied into a Balancing Authority. Loss of these facilities would not place a burden on the BES and should not require Alternative Interpersonal Communications capabilities.</p>
<p>Response: The RCSDT has not placed any limiting applicability on entities in being responsive to the FERC directive (P487, Order 693), “...ensure there is no reliability gap during normal and emergency operations. For example, during a blackstart when normal communications may be disrupted, it is essential that the Transmission Operator, Balancing Authority and Reliability Coordinator maintain communications with their Distribution Providers and Generator Operators.” The RCSDT does not prescribe the criteria for alternative means of Interpersonal Communication capability so each entity may determine its own needs to meet the requirement. With regard to requiring other BAs or TOPs to install Alternative Interpersonal Communication capability as registered entities, other BAs or TOPs have the same responsibility to comply with the requirement. Having a satellite backup is an acceptable form of communication. No change made.</p>		
MISO Standards Collaborators	Yes	<p>(1) We agree with the addition of “Adjacent” entities in the quoted parts. However, there are some entities which may need the capability even though they are not “synchronously connected within the same Interconnection.” This standard does not require them to have the capability, but it does not preclude such capability. In these cases, those entities should evaluate whether the need for the capability is a reliability need or market coordination. If the entities were connected synchronously, actions taken by an entity could have immediate effect upon other entities. However, if not synchronously connected, changes in flows across the asynchronous ties would have to follow the interchange scheduling process with approval by all involved entities before changes could be enacted. Some TOPs do communicate with other TOPs even in another Interconnection (e.g. between Quebec and all of its asynchronously interconnected neighbors).</p> <p>The RCSDT has made clarifying changes by adding a Part to R3 and R4 to address asynchronous connections between Transmission Operators and has eliminated the</p>

Organization	Yes or No	Question 2 Comment
		<p>phrase “within the same Interconnection.” See change in COM-001-2, R3 and R4.</p> <p>(2) Measure M3 does not cover the added R3.5 condition (having Interpersonal Communications capability with each adjacent TOP). M3 needs to be revised.</p> <p>The RCSDT thanks you for catching this oversight. The corresponding TOP entity in R3.5 has been added to the Measure M3.</p>
<p>Response: See response above.</p>		
<p>Entergy Services, Inc</p>	<p>Yes</p>	<p>Entergy agrees with the inclusion of the term “Adjacent” in these requirements to limit the entities that the BA or TOP must have communications capability with to those that they border.</p>
<p>Response: Thank you for your comment.</p>		
<p>Duke Energy</p>	<p>Yes</p>	<p>However, we believe that the phrase “synchronously connected within the same Interconnection” should be struck, because TOPs are controlling DC ties and should be required to have communications with each other.</p>
<p>Response: The RCSDT has made clarifying changes by adding a Part to R3 and R4 to address asynchronous connections between Transmission Operators and has eliminated the phrase “within the same Interconnection.” See change in COM-001-2, R3 and R4.</p>		
<p>ERCOT ISO</p>	<p>Yes</p>	<p>These changes will clarify intentions regarding the undefined term "adjacent."</p>
<p>Response: The RCSDT thanks you for your comment and recognizes the confusion created by having “Adjacent” start the sentence. This gave the appearance of a defined NERC glossary term. The RCSDT has made conforming measures to eliminate this problem. See changes to COM-001-2, R1.2, R2.2, R3.5, R4.3, R5.5, and R6.3.</p>		
<p>ReliabilityFirst</p>	<p>Yes</p>	<p>ReliabilityFirst agrees with adding the term adjacent but is unclear what the term adjacent is referring to. Does it mean directly connected or is it more than one layer out.</p>

Organization	Yes or No	Question 2 Comment
<p>Response: The RCSDT thanks you for your comment and recognizes the confusion created by having “Adjacent” start the sentence. This gave the appearance of a defined NERC glossary term. The RCSDT has made conforming measures to eliminate this problem. See changes to COM-001-2, R1.2, R2.2, R3.5, R4.3, R5.5, and R6.3.</p>		
Pacific Northwest Generating Cooperative	Yes	
City of Tacoma, Department of Public Utilities, Light Division, dba Tacoma Power	Yes	
LG&E and KU Services Company	Yes	
Bonneville Power Administration	Yes	
Dominion	Yes	
Western Electricity Coordinating Council	Yes	
Southwest Power Pool Regional Entity	Yes	
FirstEnergy	Yes	
Florida Municipal Power Agency	Yes	
Global Engineering and	Yes	

Organization	Yes or No	Question 2 Comment
Energy Solutions		
ACES Power Marketing Standards Collaborators	Yes	
Salt River Project	Yes	
San Diego Gas & Electric	Yes	
Liberty Electric Power LLC	Yes	
NIPSCO	Yes	
Oncor Electric Delivery Company LLC	Yes	
We Energies	Yes	
City of Jacksonville Beach dba/ Beaches Energy Services	Yes	
Luminant Energy Company LLC	Yes	
NextEra Energy, Inc.	Yes	
Pepco Holdings Inc.	Yes	
Manitoba Hydro	Yes	
Niagara Mohawk (dba	Yes	

Organization	Yes or No	Question 2 Comment
National Grid)		
American Electric Power	Yes	
South Carolina Electric and Gas	Yes	
Georgia Transmission Corporation	Yes	
BGE	Yes	
Nebraska Public Power District	Yes	
Georgia System Operations	Yes	
City of Vero Beach	Yes	
NV Energy	Yes	
Midwest Independent Transmission System Operator	Yes	
American Transmission Company, LLC	Yes	
Indiana Municipal Power Agency		No comment.

3. The RCSDT removed the phrase "to exchange Interconnection and operating information" in COM-001-2, Requirements R1 through R8 based on stakeholder comments. Do you agree with the revision? If not, please explain in the comment area below.

Summary Consideration: Several commenters noted the phrase “to exchange Interconnection and operating information” should also be removed from the Purpose statement. The RCSDT agrees and removed this phrase from the Purpose statement. Some concerns also noted COM-001-2 should also add additional language to clarify the standard is not for the exchange of data. Since the standard focuses on having communication capability, the additional clarity is not needed; therefore, the RCSDT made no change. Some commenters noted items which have been addressed in the questions above.

Organization	Yes or No	Question 3 Comment
Global Engineering and Energy Solutions	No	
Independent Electricity System Operator	No	<p>In the last posting, we suggest removing the phrase “within the same Interconnection” from R1 (now R2.2) since there are RCs between two Interconnections that need to communicate with each other for reliability coordination (e.g. between Quebec and the RCs in the Northeast such as IESO, NYISO, NBSO and ISO-NE, and between the RCs in WECC with the RCs in the Eastern Interconnection). Such coordination may include but not limited to curtailing interchange transactions crossing Interconnection/RC boundary, as stipulated in IRO-006. The SDT’s response to our comments citing that the phrase was added to address the ERCOT situation leaves a reliability gap to the other situations. We again urge the SDT to remove the phrase. If necessary, the ERCOT situation can be addressed by a regional variance.</p>
<p>Response: The RCSDT has made clarifying changes by adding a Part to R3 and R4 to address asynchronous connections between Transmission Operators and has eliminated the phrase “within the same Interconnection.” See change in COM-001-2, R3 and R4.</p>		

Organization	Yes or No	Question 3 Comment
Great River Energy	No	<p>"to exchange interconnection and operation information" was removed from the requirements in COM-001-2 but remains in the purpose. For consistency, it needs to be removed. It could read,</p> <p><i>"To establish Interpersonal Communication capabilities for the exchange of information necessary to maintain reliability."</i></p>
<p>Response: The SDT agrees and has made a conforming change to the Purpose of COM-001. See revised Purpose statement.</p>		
Ingleside Cogeneration LP	No	<p>In the background section of this ballot, the project team indicates that the removal of the phrase is intended to signal that these requirements do NOT apply to the exchange of data. Although Ingleside Cogeneration LP agrees that the phrase is not a helpful description of the need for inter-entity communications - and should be removed - we do not see how the remaining language achieves the project team's purpose.</p> <p>It seems the confusion stems from the multitude of data communication types. Email messages between operating entities may be a valid communications path under COM-001-2, while telemetry/control is covered under other Standards. We believe that a technical guideline may be an appropriate vehicle to distinguish what types of communications are subject to these requirements, and which are not.</p>
<p>Response: The RCSDT has drafted performance requirements that are intended to be flexible enough to accommodate different technologies and innovation by industry. It is not the intent of the drafting team to establish all the possible methods of communicating. Drafting teams generally do not create guidelines. No change made.</p>		
ISO New England	No	<p>ISO-NE does not believe COM-001, in its entirety, is a results-based standards and therefore does not support the draft as written. We believe such "requirements" (i.e. capabilities) should be verified through an entity certification process.</p> <p>Additionally, results-based requirements should be the driver to have the capability to achieve them; on other words, there is no other way to reliably dispatch than to</p>

Organization	Yes or No	Question 3 Comment
		have communications facilities (electronic or voice).
<p>Response: Although this is not a results-based standard, the RCSDT believes it is a significant improvement over the current COM-001 standard. No change made.</p>		
Hydro One Networks Inc.	No	<p>(1) In the last posting, there were suggestions of removing the phrase “within the same Interconnection” from R1 (now R2.2) since there are RCs between two Interconnections that need to communication with each other for reliability coordination (e.g. between Quebec and the RCs the Northeast such as IESO, NYISO, NBSO and ISO-NE, and between the RCs in WECC with the RCs in the Eastern Interconnection). Such coordination may include but not limited to curtailing interchange transactions crossing Interconnection/RC boundary, as stipulated in IRO-006. The SDT’s response to our comments citing that the phrase was added to address the ERCOT situation leaves a reliability gap to the other situations. We again urge the SDT to remove the phrase. If necessary, the ERCOT situation can be addressed by a regional variance.</p>
<p>Response: Requirement R1 addresses a reliability need for adjacent Reliability Coordinators synchronously connected within the same interconnection to have Interpersonal Communication capability; however, it does not preclude or limit the Reliability Coordinator from establishing Interpersonal Communication capability with others. The RCSDT does not see where there is a need to communicate with other Reliability Coordinators from one Interconnection to another. No change made.</p>		
SERC OC Standards Review Group	Yes	We suggest that this phrase should also be removed from the “Purpose” statement.
<p>Response: The SDT agrees and has made a conforming change to the Purpose of COM-001: See revised Purpose statement.</p>		
MISO Standards Collaborators	Yes	We urge the SDT to remove the phrase. If necessary, regional situations can be addressed by a regional variance.
<p>Response: The SDT agrees and has made a conforming change to the Purpose of COM-001: See revised Purpose statement.</p>		

Organization	Yes or No	Question 3 Comment
ACES Power Marketing Standards Collaborators	Yes	<p>We thank the drafting team for making this change and for the clear communication that the intent of this standard is not for data exchange in the response to comments. However, we do believe one additional change is necessary to make the intent absolutely clear.</p> <p>The purpose of statement of COM-001-2 still includes the phrase “to exchange Interconnection and operating information.” Since a standard must stand on its own, we believe it is necessary to remove that phrase from the purpose statement to avoid misinterpretations in the future. Auditors and enforcement personnel are not required to understand the development history when enforcing the standard. Furthermore, the purpose is really to enable communications between these functional entities.</p>
<p>Response: The SDT agrees and has made a conforming change to the Purpose of COM-001: See revised Purpose statement.</p>		
Southern Company	Yes	We suggest that this phrase should also be removed from the “Purpose” statement.
<p>Response: The SDT agrees and has made a conforming change to the Purpose of COM-001: See revised Purpose statement.</p>		
Entergy Services, Inc	Yes	Yes, the requirements of this standard pertain to having communications capability. The specific content of that communication should not be the subject of the standard.
<p>Response: The SDT agrees and has made a conforming change to the Purpose of COM-001: See revised Purpose statement.</p>		
We Energies	Yes	Please add "does not include telemetered or derived data"
<p>Response: The standard COM-001 is for Interpersonal Communication capability, which facilitates the communication (i.e., “... to interact, consult, or exchange information.”) and not the exchange of data which is addressed in IRO-010. No change made.</p>		
Duke Energy	Yes	However, the definition of Interpersonal Communication should also be expanded to clearly include the drafting team’s intent that the capability is NOT for the exchange

Organization	Yes or No	Question 3 Comment
		<p>of data.</p> <p>The phrase “for the exchange of Interconnection and operating information” should also be struck from the Purpose statement.</p>
<p>Response: The SDT agrees and has made a conforming change to the Purpose of COM-001: See revised Purpose statement.</p> <p>The standard COM-001 is for Interpersonal Communication capability, which facilitates the communication (i.e., “... to interact, consult, or exchange information.”) and not the exchange of data which is addressed in IRO-010. No change made.</p>		
Pacific Northwest Generating Cooperative	Yes	
MRO NSRF	Yes	
City of Tacoma, Department of Public Utilities, Light Division, dba Tacoma Power	Yes	
LG&E and KU Services Company	Yes	
Bonneville Power Administration	Yes	
SPP Standards Review Group	Yes	
Dominion	Yes	
Western Electricity Coordinating Council	Yes	

Organization	Yes or No	Question 3 Comment
Southwest Power Pool Regional Entity	Yes	
FirstEnergy	Yes	
Florida Municipal Power Agency	Yes	
Kansas City Power & Light	Yes	
Salt River Project	Yes	
San Diego Gas & Electric	Yes	
Central Lincoln	Yes	
Xcel Energy	Yes	
Liberty Electric Power LLC	Yes	
NIPSCO	Yes	
Oncor Electric Delivery Company LLC	Yes	
Consolidated Edison Co. of NY, Inc.	Yes	
City of Jacksonville Beach dba/ Beaches Energy Services	Yes	

Organization	Yes or No	Question 3 Comment
Luminant Energy Company LLC	Yes	
NextEra Energy, Inc.	Yes	
Pepco Holdings Inc.	Yes	
Exelon	Yes	
Manitoba Hydro	Yes	
Orange and Rockland Utilities, Inc.	Yes	
Niagara Mohawk (dba National Grid)	Yes	
American Electric Power	Yes	
South Carolina Electric and Gas	Yes	
BGE	Yes	
Nebraska Public Power District	Yes	
ERCOT ISO	Yes	
ReliabilityFirst	Yes	
City of Vero Beach	Yes	

Organization	Yes or No	Question 3 Comment
NV Energy	Yes	
Midwest Independent Transmission System Operator	Yes	
Texas Reliability Entity	Yes	
American Transmission Company, LLC	Yes	
Indiana Municipal Power Agency		No comment.

4. **A new requirement was added for clarity regarding what is required of Distribution Providers and the Generator Operators: R11. Each Distribution Provider and Generator Operator that experiences a failure of any of its Interpersonal Communication capabilities shall consult with their Transmission Operator or Balancing Authority as applicable to determine a mutually agreeable time to restore the Interpersonal Communication capability. [Violation Risk Factor: Medium][Time Horizon: Real-time Operations] This requirement requires collaboration between entities to restore a failed communications capability. Do you agree with the new requirement? If not, please explain in the comment area below.**

Summary Consideration: Most of the comments pertain to compliance and clarity concerns; for example, the use of “any of” in the requirement. The phrase “any of” has been eliminated to resolve this concern. Additionally, the RCSDT made a clarifying change to indicate the DP and GOP only need to consult with the entity affected by the failure. Other comments recommended using the terms, such as, “primary,” “secondary,” “device,” “means,” and “medium” with regard to the proposed definitions. The RCSDT emphasizes the requirements are for “capability” and adding such proposed terms is not needed to achieve the necessary clarity. Some commenters raised concerns about being able to reach “mutually agreeable time” for restoration. The RCSDT addressed these concerns by revising the phrase to “mutually agreeable action,” which allows the applicable entities to reach consensus on the effort needed to restore communications. This change also provides flexibility to the entities in addressing the steps to restore communications rather than focusing on the time for restoration. The requirement does not limit the sources of information. Allowing the DP and GOP to reach a mutually agreeable action, eliminates the need for Alternative Interpersonal Communication capability considering the limited impact a failure might have on DPs and GOPs overall. From a compliance standpoint, the DP or GOP that is working to restore its Interpersonal Communication capability is not out of compliance as far as the entity is meeting the requirement for taking action to restore its capability. Other similar concerns pertained to having 24/7 dispatch, which is an operational function. The requirements are constructed around having communication capability. The RCSDT understands there may be entities that have certain operations where there is not 24/7 staffing and these cases should be addressed by their operation with other entities through agreements, procedures or other means as needed for reliable operations. Other minor corrections and formatting issues noted were reviewed and corrected accordingly.

Some commenters were concerned that large entities would not be capable of meeting the 60-minute notification upon the loss of their Interpersonal Communication capability. The RCSDT notes this pertains to the BA, RC, and TOP, which are required to have an Alternative Interpersonal Communication capability, and should have the ability to accomplish the required notification. Also, the loss of Interpersonal Communication capability may not always impact the entire capability. This time frame does not apply to the DP and GOP since the Alternative Interpersonal Communication capability is not required for these functional entities. Other minor formatting and corrections to references were made, such as, focusing on using the singular form of words rather than the plural to avoid confusion.

Organization	Yes or No	Question 4 Comment
Alliant Energy Corp. Services, Inc.	Negative	COM-001-2: Alliant Energy is opposed to the use of the word "any" as it is too broad. It should be revised to the primary Interpersonal Communication capabilities with the Transmission Operator or Balancing Authority.
<p>Response: The RCSDT appreciates your comment and has made clarifying changes by removing the phrase “any of” in COM-001, R11. Additionally, the RCSDT made a clarifying change to indicate the DP and GOP only need to consult with the entity affected by the failure.</p> <p>The RCSDT emphasizes the requirement refers only to Interpersonal Communication capabilities. Adding the phrase “to the primary” is not needed. Please refer to the definitions of Interpersonal Communication and Alternative Interpersonal Communication for clarification. No change made.</p>		
Wisconsin Electric Power Marketing; Wisconsin Electric Power Co.	Negative	R11 is not clear on the purpose of the statement “determine a mutually agreeable time for restoration” this could be driven by forces outside the control any of the entities. I think, “provide estimated restoration and actual restoration time and determine mutually agreeable alternative during outage” would be better.
<p>Response: The RCSDT has made clarifying changes to R11 to use mutually agreeable action rather than time for restoration.</p>		
Lakeland Electric	Negative	Use of the term "any" in the new R11 and immediate non-compliance if there is a failure in a communication system.
<p>Response: The RCSDT appreciates your comment and has made clarifying changes by removing the phrase “any of” in COM-001, R11. Additionally, the RCSDT made a clarifying change to indicate the DP and GOP only need to consult with the entity affected by the failure.</p>		
SERC OC Standards Review Group	No	We suggest Requirement 11 should be deleted as the generic nature of the term “...any of its Interpersonal Communications capabilities...” could be interpreted to include communications capabilities used for internal DP/GO purposes. Such DP/GO internal communications capability would not be critical to BES reliability. Also, no BES reliability benefit is realized by the parties simply agreeing to a time for the

Organization	Yes or No	Question 4 Comment
		restoration of the failed Interpersonal Communication capability.
<p>Response: The RCSDT appreciates your comment and has made clarifying changes by removing the phrase “any of” in COM-001, R11. Additionally, the RCSDT made a clarifying change to indicate the DP and GOP only need to consult with the entity affected by the failure.</p>		
Pacific Northwest Generating Cooperative	No	<p>As per COM-001-2, R7, “Each Distribution Provider shall have Interpersonal Communications capability with the following entities...” R11 states that the DP or GOP that experiences a failure of its Interpersonal Communications ability shall consult with TOPs and BAs and agree on how to restore Interpersonal Communications. We believe better language might be, “Restore Interpersonal Communications with your TOP/BA as soon as operationally feasible.”</p>
<p>Response: The RCSDT notes that R11 does not limit the sources of information used by the DP or GOP in establishing a mutually agreeable restoration time for its Interpersonal Communication capability with its TOP or BA. That is precisely why R11 is written in this manner. This allows flexibility on the part of the TOP and BA in determining when the Interpersonal Communication capability must be restored. In situations where there is little or no impact to the reliability of the BES, some flexibility could be allowed without requiring the acquisition of Alternative Interpersonal Communication capability. The RCSDT has made clarifying changes to R11 to use mutually agreeable action rather than time for restoration.</p>		
MRO NSRF	No	<p>Please note that the use of the word “any” as in “Each Distribution Provider and Generator Operator that experiences a failure of any of its Interpersonal Communication capabilities...” will be viewed as meaning every Interpersonal Communication medium that an Entity has or uses. The NSRF recommends that the word “any” be removed from this Requirement.</p> <p>The RCSDT appreciates your comment and has made clarifying changes by removing the phrase “any of” in COM-001, R11. Additionally, the RCSDT made a clarifying change to indicate the DP and GOP only need to consult with the entity affected by the failure.</p> <p>The NSRF recommends that R11 be revised to read:</p>

Organization	Yes or No	Question 4 Comment
		<p><i>“Each Distribution Provider and Generator Operator that experiences a failure of any of its primary (or defined) Interpersonal Communication capabilities with its Transmission Operator or Balancing Authority...”</i></p> <p>In that way it focuses it down to the communications issues with the TOP or BA. In lieu of “primary” the SDT could state “defined” as long as it is not meant to be “any.”</p> <p>The RCSDT emphasizes the requirement refers only to Interpersonal Communication capabilities. Adding the phrase “to the primary” is not needed. Please refer to the definitions of Interpersonal Communication and Alternative Interpersonal Communication for clarification. No change made.</p> <p>The latter part of R11 states; “...shall consult with their Transmission Operator or Balancing Authority as applicable to determine a mutually agreeable time to restore the Interpersonal Communication capability.” This ambiguous statement does not support reliability. Consulting with a TOP or BA does not solve the problem of the lack of Interpersonal Communication capabilities. The NSRF recommends this be rewritten as:</p> <p><i>“...shall consult with inform their Transmission Operator or Balancing Authority as applicable as to the status of the Interpersonal Communication capability.”</i></p> <p>So the new R11 would read:</p> <p><i>“Each Distribution Provider and Generator Operator that experiences a failure of its primary (or designated) Interpersonal Communication with their Transmission Operator or Balancing Authority shall inform them, as applicable, as to the status of the Interpersonal Communication capability.”</i></p> <p>The RCSDT has made clarifying changes to R11 to use mutually agreeable action rather than time for restoration.</p>
<p>Response: See response above.</p>		

Organization	Yes or No	Question 4 Comment
<p>LG&E and KU Services Company</p>	<p>No</p>	<p>Regarding R11, as written it is unclear when the DP and GOP are required to consult with their TOP or BA. “[A] failure of any of its Interpersonal Communication capabilities” could be construed to mean any internal phone line of either the DP or GOP failing. Internal phone lines do not affect either the DP’s or GOP’s ability to communicate with the TOP or BA.</p> <p>If the DP or GOP loses its Interpersonal Communication with an entity it is required to have the capability with, then the entity must consult with that entity to determine a mutually agreeable action (was time) to restore. A failure of the entity’s capability means the entity is no longer able to communicate with its BA or TOP, then it must consult with the affected entity.</p> <p>It is also unclear whether a failure of an interpersonal communication capability would require consultation if there were multiple other interpersonal communication capabilities that were still fully functional.</p> <p>Furthermore, what exactly is required in “consultation” and who would be responsible if the “consulting” entities did not come to a “mutually agreeable time” are questions that are left unanswered.</p> <p>LG&E and KU Services Company suggest the following language:</p> <p><i>R11. Each Distribution Provider and Generator Operator that experiences a failure of more than one of its Means for Interpersonal Communications or failure of its Alternative Means for Interpersonal Communication with their Transmission Operator or Balancing Authority shall notify their Transmission Operator or Balancing Authority regarding the time to restore the impacted Means for Interpersonal Communication or Alternative Means for Interpersonal Communication.</i></p> <p>The RCSDT thanks you for your comment; however, great lengths were taken in communicating mediums regarding IC and AIC and finds that adding “Means” to the proposed terms being defined diminishes clarity of the definition. No change made.</p>

Organization	Yes or No	Question 4 Comment
<p>Response: See response above.</p>		
<p>PPL Electric Utilities and PPL Supply NERC Registered Organizations</p>	<p>No</p>	<p>PPL has concerns with the use of the word “any” in this requirement. PPL recommends striking the words “any of” and instead using “its primary” as follows:</p> <p>The RCSDT appreciates your comment and has made clarifying changes by removing the phrase “any of” in COM-001, R11. Additionally, the RCSDT made a clarifying change to indicate the DP and GOP only need to consult with the entity affected by the failure.</p> <p><i>Each Distribution Provider and Generator Operator that experiences a failure of its primary Interpersonal Communication capabilities with its Transmission Operator or Balancing Authority...</i> In the current version, it is unclear when the DP and GOP are required to consult with their TOP or BA.</p> <p>The RCSDT notes that the requirement refers only to Interpersonal Communication capabilities. Adding the phrase “to the primary” is not needed. Please refer to the definitions of Interpersonal Communication and Alternative Interpersonal Communication for clarification. No change made.</p> <p>“[A] failure of any of its Interpersonal Communication capabilities” could be construed to mean an internal phone line of either the DP or GOP failing. Internal phone lines do not affect either the DP’s or the GOP’s ability to communicate with the TOP or BA.</p> <p>It is also unclear whether a failure of an interpersonal communication capability would require consultation if there were multiple other interpersonal communication capabilities that were still fully functional.</p> <p>The RCSDT believes an entity meets the intent of the requirement when it has Interpersonal Communication capability, whether through a single capability or multiple capabilities. A single failure of an entity’s capability would not require any consultation if the entity continues to have the capability. The drafting team has removed the phrase “any of” as a clarifying change. Additionally, the RCSDT made a</p>

Organization	Yes or No	Question 4 Comment
		clarifying change to indicate the DP and GOP only need to consult with the entity affected by the failure.
Response: See response above.		
SPP Standards Review Group	No	<p>We would suggest deleting the phrase ‘any of’ in the Requirement. It would then read:</p> <p><i>‘Each DP and GOP that experiences a failure of its Interpersonal Communication...’</i></p> <p>The RCSDT appreciates your comment and has made clarifying changes by removing the phrase “any of” in COM-001, R11. Additionally, the RCSDT made a clarifying change to indicate the DP and GOP only need to consult with the entity affected by the failure.</p> <p>Also, how does the DP or GOP consult with its TOP or BA when it loses its Interpersonal Communications capability?</p> <p>To do this wouldn’t they have to have an Alternative Interpersonal Communications capability?</p> <p>The RCSDT believes each entity must determine how to accomplish this (R11) and having another requirement or change would be overly prescriptive. No change made.</p>
Response: See response above.		
Western Electricity Coordinating Council	No	<p>We have two concerns with R11 as worded.</p> <p>First, the term "as applicable" is undefined. Who decides what is applicable. We suggest that words clarifying which entity, TOP or BA, the DP and GO experiencing a failure of any of its Interpersonal Communication capabilities must consult with.</p> <p>The RCSDT appreciates your comment and has made clarifying changes by removing the phrase “as applicable” in COM-001, R11.</p>

Organization	Yes or No	Question 4 Comment
		<p>Second, the inclusion of the "mutually agreeable" time to restore the Interpersonal Communication capability is problematic. Although unlikely, two entities could "mutually agree" to an exceptionally long time frame for restoration (two years) and that unreasonable timeframe would meet the requirement as long as they both agreed. Suggest some finite time limit be included.</p> <p>The RCSDT has made clarifying changes to R11 to reference "mutually agreeable action," rather than "time" for restoration. The use of "action" eliminates the need for a timeframe. New information regarding the restoration parameters may change under a mutually agreeable action.</p>
<p>Response: See response above.</p>		
FirstEnergy	No	<p>Although we agree with the intent of the requirement, we are concerned with the use of "any of its Interpersonal Communication." The word "any" is very inclusive and the team should consider narrowing it down to those capabilities that may adversely impact reliability.</p>
<p>Response: The RCSDT appreciates your comment and has made clarifying changes by removing the phrase "any of" in COM-001, R11. Additionally, the RCSDT made a clarifying change to indicate the DP and GOP only need to consult with the entity affected by the failure.</p>		
Florida Municipal Power Agency	No	<p>By use of the term "any" in the phrase "a failure of any of its Interpersonal Communication" the standard will actually create a disincentive for redundant communications with DPs and GOPs due to compliance risk.</p> <p>The RCSDT appreciates your comment and has made clarifying changes by removing the phrase "any of" in COM-001, R11. Additionally, the RCSDT made a clarifying change to indicate the DP and GOP only need to consult with the entity affected by the failure.</p> <p>To truly further the goals of reliability, the requirement should align with R3.3 and R3.4 which requires a primary Interpersonal Communications capability and R4 which</p>

Organization	Yes or No	Question 4 Comment
		<p>does not require DPs or GOPs to have Alternative Interpersonal Communications capability.</p> <p>A possible solution is through use of the terms “Primary” for R3 and “Alternate” for R4 and then make R11 applicable to Primary only.</p> <p>The term “Interpersonal Communication” is a defined term in this standard. As such, it has a different meaning than “Alternative Interpersonal Communication,” thus there should be no confusing of the two. In addition, the word “primary” purposely does not exist in the requirements since the RCSDT did not intend to create a requirement for redundancy. Redundancy continues to be a good practice, but it is not required by this standard except that some entities must have both an Interpersonal Communication capability and a designated Alternative Interpersonal Communication capability. No change made.</p>
<p>Response: See response above.</p>		
<p>Global Engineering and Energy Solutions</p>	<p>No</p>	<p>We are pleased that the drafting team addition provides addition description on the process for communicating failed Interpersonal Communication. However additional clarity should be made regarding if there is an expectation that the Interpersonal Communication should be available 24x7. There are many Distribution Providers that do not have a 24x7 managed facility that can view and respond to a communication received in real time on the Interpersonal Communication device. These DPs rely on on-call personnel for off-hour emergencies such as an outage on the distribution system. The on-call personnel may use a cell phone, pager, etc. In other cases, the Transmission Operator or Balancing Authority may communicate by email and response is provided during business hours. In these cases, if the Transmission Operator or Balancing Authority had a system emergency they have the ability to isolate the distribution system from the grid and therefore do not require a 24x7 manned distribution.</p> <p>If the intent of the Standard is for ensuring real-time communication than the</p>

Organization	Yes or No	Question 4 Comment
		<p>applicability should be limited to those Distribution Providers who have been required by the Transmission Operator or Balancing Authority to have a manned 24x7 manned facility. Many of the DPs referred to here have not received a real-time call in the last 20 years. Requiring them to staff 24x7 for a condition likely not to occur is cost prohibited and does not improve reliability.</p>
<p>Response: The RCSDT thanks you for your comment. There is no requirement for 24/7 support. The requirement is to have communications capability. The type of system (e.g., On-Call) is not prescribed in the standard, and the standard is designed not to impose needless communications requirements. The Purpose of COM-001-2 is, “To establish Interpersonal Communication capabilities necessary to maintain reliability. No change made.</p>		
<p>ACES Power Marketing Standards Collaborators</p>	<p>No</p>	<p>Requirement R11 does not fully address the issue of what is required by Distribution Providers and Generator Operators and introduces new issues.</p> <p>The RCSDT notes that R11 grants the DP and GOP flexibility in determining, in conjunction with its TOP or BA, when its Interpersonal Communication capability requires restoration. This would provide allowances for those entities, which have little or no impact on the reliability of the BES. No change made.</p> <p>First, while the standard is intended to clarify that the Distribution Provider and Generator Operator do not need backup communications capability, it simply does not. Distribution Providers and Generator Operators are required to have an Interpersonal Communications capability in Requirement R7 and R8 respectively. Unfortunately, the effectiveness of these requirements persists even when the Distribution Provider or Generator Operator experiences a failure of its Interpersonal Communications capability. When Requirement R11 applies, the Distribution Provider or Generator Operator will still be obligated to comply with Requirements R7 and R8 respectively and will, in fact, be in violation of these requirements because the Distribution Provider or Generator Operator no longer has the capability.</p> <p>The RCSDT thanks you for your comment. Requirements R7 and R8 have been revised to account for the failure of Interpersonal Communication capability. The</p>

Organization	Yes or No	Question 4 Comment
		<p>intent of R11 is to require the responsible entity to take action upon the failure of its Interpersonal Communication.</p> <p>Second, capability is used inconsistently between Requirement R7 and R11, which leads to confusion. In Requirement R7, it is singular while in Requirement R11 is plural. It needs to be clear that only the failure of the capability identified in R7 and R8 needs to be reported by the Distribution Provider and Generator Operator respectively.</p> <p>The RCSDT thanks you for your observation and has modified COM-001-2 R11 to be singular and to more clearly address the entities being consulted with upon a failure.</p> <p>Third, if the requirements focused on communications devices rather than capabilities, they would come closer to communicating the intent. Requirement R11 would better complement Requirement R7 and R8 if the focus was on having a communication medium or device.</p> <p>The RCSDT believes that prescribing a device or medium would limit an entity. In regards to a device not functioning properly is contrary to R10, notification of Interpersonal Communication capability failure. Please refer to the definition of Interpersonal Communication and Alternative Interpersonal Communication. No change made.</p> <p>A Generator Operator with an installed communications device or medium still has that device or medium even when it is not functioning properly and could still meet Requirements R7 and R8. However, they don't have the Interpersonal Communications capability if the device is not functioning properly.</p> <p>The RCSDT thanks you for your comment. Requirements R7 and R8 have been revised to account for the failure of Interpersonal Communication capability. The intent of R11 is to require the responsible entity to take action upon the failure of its Interpersonal Communication.</p>

Organization	Yes or No	Question 4 Comment
<p>Response: See response above.</p>		
<p>Kansas City Power & Light</p>	<p>No</p>	<p>How does a DP or GOP experiencing a failure of its “interpersonal communications” consult with its TOP or BA to determine a mutually agreeable time for restoration of “interpersonal communications”? There are no requirements that require alternative “interpersonal communications” for the DP and GOP. This requirement cannot be fulfilled and should be removed.</p>
<p>Response: The RCSDT notes that R11 does not limit the sources of information used by the DP or GOP in establishing a mutually agreeable restoration time for its Interpersonal Communication capability with its TOP or BA; that is precisely why R11 is written in this manner. This allows flexibility on the part of the TOP and BA in determining when the Interpersonal Communication capability must be restored. In situations where there is little or no impact to the reliability of the BES, some flexibility could be allowed without requiring the acquisition of Alternative Interpersonal Communication capability. The RCSDT has made clarifying changes to R11 to use mutually agreeable action, rather than time for restoration.</p>		
<p>Southern Company</p>	<p>No</p>	<p>We suggest the following changes:</p> <ol style="list-style-type: none"> Requirement 10 should include Distribution Providers and Generator Operators, The RCSDT stresses that R11 grants the DP and GOP flexibility in determining, in conjunction with its TOP or BA, when its Interpersonal Communication capability must be restored. This would provide allowances for those entities, which have little or no impact on the reliability of the BES, while not requiring them to obtain Alternative Interpersonal Communication capabilities. Making the proposed changes would eliminate this flexibility. Removing R11 takes away the RCSDT’s effort to include those provisions in the standard. No change made. Entities to be notified should be “as identified in requirements R1 through R8”, The RCSDT thanks you for pointing this out. The RCSDT has modified the language of R10 to refer to R1, R3, and R5, rather than “R1 through R6” since the responsible entities are limited to the RC, the TOP, and the BA in these requirements.

Organization	Yes or No	Question 4 Comment
		<p>3. Requirement 11 should be deleted, and, The RCSDT thanks you for your comment. COM-001-2 R11 requires the entity to consult with its BA or TOP when it experiences a failure of its Interpersonal Communication capability. The BA or TOP need to know communication is compromised between the DP or GOP.</p> <p>4. Measures (M10) and VSLs should be adjusted accordingly. The RCSDT did not elect to include the DP and GOP in R10; therefore, Measure, M10 and the corresponding VSLs were not adjusted. No change made.</p>
<p>Response: See response above.</p>		
Central Lincoln	No	<p>The new requirement presents us with a paradoxical situation. The communication has failed, so we must consult; yet consultation requires communication. We note that the SDT used the word “any”, implying that multiple communication paths are required. The reality of the situation at Central Lincoln, due to our remote location, is that a single back hoe incident at the right location can take out all of our of our communication capability (including the terrestrial portion of the cellular networks) with our BA/TO; making this requirement impossible to meet for this circumstance using our present capabilities.</p> <p>The RCSDT appreciates your comment and has made clarifying changes by removing the phrase “any of” in COM-001, R11. Additionally, the RCSDT made a clarifying change to indicate the DP and GOP only need to consult with the entity affected by the failure.</p> <p>Furthermore, R11 addresses the direction given in Order 693 that DP and GOP entities do not necessarily need to have Alternative Interpersonal Communication capability. The requirement allows flexibility in “consult with” by not naming the method. If all communications are out, then the DP or GOP may have to meet the requirement by an in-person consultation.</p>

Organization	Yes or No	Question 4 Comment
		<p>We also note that no time limit was indicated. Most interruptions are brief, and fixed before consultation could reasonably take place. CEAs will be finding entities non-compliant for quickly fixing problems at their end without first consulting to ensure the restoration time was agreeable. To avoid non-compliance, entities will be forced delay repairs while they investigate alternative communication paths for consultation purposes. We fail to see how such an outcome improves reliability.</p> <p>The DP and GOP are only required to have Interpersonal Communication capability. If the DP or GOP restores its Interpersonal Communication capability before it could reasonably contact the affected entity by another method, there is no failure to comply. The DP or GOP could then consult with the affected entity to determine a mutually agreeable action. In this case, the RCSDT believes the "action" would then be the entities acknowledging the failure and the repair; therefore, no mutually agreeable action is needed. The RCSDT recognizes there is no way to account for all the various circumstances in a failure. To comply, the DP and GOP are still required to consult the entity which the failure affected regardless of whether the Interpersonal Communication capability was restored or is still failed. No change made.</p> <p>The new requirement is one sided, requiring the DP and GOP to consult with no corresponding requirement for the TO or BA to have personnel available for such a consultation. Consultation failure or failure to mutually agree due to actions or inactions on the part of the TO or BA should not result in an enforcement action against the DP or GOP, yet that is how the requirement is written.</p> <p>The RCSDT notes that once the failure has been detected, the responsible entity must make the consultation with the BA or TOP; that relieves the compliance burden. While the RCSDT understands your concern about single points of failure, the question becomes should this relieve the DP or GOP of the requirement for having Interpersonal Communication capabilities. No change made.</p> <p>The new requirement fails to add any "clarity" to the other requirements, and we don't see that the stakeholders thought there was a problem with DP/GOP obligation</p>

Organization	Yes or No	Question 4 Comment
		<p>clarity. Instead, it adds new obligations with no justification for how they enhance reliability. We suggest removing the requirement.</p> <p>Based on the RCSDT’s understanding of the comments received on the previous posting, the industry desired additional clarity on specifically what communication capabilities the DP and GOP were required to have. There was confusion that the standard did not specifically say that the DP and GOP were required to have Alternative Interpersonal Communication capabilities. R11 clarifies that a DP and GOP are not required to have Alternative Interpersonal Communication capability if the DP or GOP consult with their TOP or BA, whichever is applicable in the given situation, and they mutually agree that the restoration action does not adversely impact the reliability of the BES. No change made.</p>
<p>Response: See response above.</p>		
<p>Entergy Services, Inc</p>	<p>No</p>	<p>The DP or GOP should have to notify the TOP and BA of its communications failure, similar to the requirement in R10 for TOP and BA. The DP or GOP should restore the communications capability as soon as possible. Entergy does not agree that the TOP or BA should have to negotiate the restoration time with the DP or GOP. This is an unreasonable burden on the BA and TOP.</p>
<p>Response: The RCSDT notes that R11 does not exempt the DP or GOP from notifying its TOP or BA when they experience a communication failure. There is nothing in R11 that says a DP or GOP does not have to restore its communications capability. What is in R11 is flexibility. The RCSDT has gone to great lengths to provide some flexibility for those DPs and GOPs with little or no impact on the reliability of the BES. FERC directed NERC to provide for this consideration. While one could consider this a negotiation, the notification is required so some sort of communication must be made. All that is being asked of the BA and TOP is to give some consideration for the entities involved and the overall situation. The SDT modified the requirement so mutual agreement must be reached on an “action” for restoration rather than a “time” for restoration.</p>		
<p>Liberty Electric Power LLC</p>	<p>No</p>	<p>The phrase "mutually agreeable time" needs to be replaced in order to make this standard acceptable. This phrasing creates a potential violation if equipment functionality cannot be restored in the time frame preferred by another entity, even</p>

Organization	Yes or No	Question 4 Comment
		<p>if the time of repair is beyond the control of the RE. This phrase should be replaced with "inform their TO or BA as applicable of the failure, and provide estimates as to the time the Interpersonal Communication capabilities will be restored."</p>
<p>Response: The RCSDT has gone to great lengths to provide some flexibility for those DPs and GOPs with little or no impact on the reliability of the BES. FERC directed NERC to provide for this consideration. Therefore, we use the language as proposed in R11. Mutually agreeable implies that both parties are willing to accept the outcome. It doesn't mean that a DP or GOP must comply with the wishes of its TOP or BA because as you state that could be beyond the control of the DP or GOP. However, what transpires in the consultation is a realization of what the situation is, what the impacts to reliability are and a determination of what is amicable to both parties. The RCSDT has made clarifying changes to R11 to use mutually agreeable action rather than time for restoration.</p>		
We Energies	No	<p>R11 Implies that R8 and R9 are independent and redundant to R5.3, R5.4 and R3.3 and R3.4.</p> <p>R11 is not clear on the purpose of the statement "determine a mutually agreeable time for restoration" this could be driven by forces outside the control any of the entities. I think" provide estimated restoration and actual restoration time and determine mutually agreeable alternative during outage" would be better.</p> <p>Update M9 accordingly.</p>
<p>Response: The RCSDT has made clarifying changes to R11 to use mutually agreeable action, rather than time for restoration.</p>		
Indiana Municipal Power Agency	No	<p>IMPA does not believe that this requirement is necessary in order to ensure communication lines are restored by Distribution Providers and Generator Operators. If this requirement is kept, IMPA does not think the use of the words "a failure of any of its Interpersonal Communication capabilities" is acceptable.</p> <p>The RCSDT notes the intent of this requirement is not to ensure that DP and GOP communication lines are restored. The intent of this requirement is to provide some flexibility for the DP or GOP that does not have an impact on the reliability of the BES. Depending on the impact of the given entity, the TOP or BA can be flexible in specifying when the Interpersonal Communication capability must be restored,</p>

Organization	Yes or No	Question 4 Comment
		<p>rather than requiring the availability and use of an Alternative Interpersonal Communication capability. No change made.</p> <p>The wording is too inclusive and should apply to only primary Interpersonal Communication capabilities. IMPA is also concerned about how entities are supposed to know when the telephone companies may have equipment repaired in order to determine a mutually agreeable time to restore Interpersonal Communication capability. The entity may have no control over the restoration and hence would not be able to set a time other than whenever the capabilities are restored by for instance the telephone company.</p> <p>The RCSDT deliberately avoided the use of primary and secondary mediums and elected to use communications capabilities. As such, R11 applies to Interpersonal Communication capabilities of the DP and GOP. The RCSDT has gone to great lengths to provide some flexibility for those DPs and GOPs with little or no impact on the reliability of the BES. FERC directed NERC to provide for this consideration. Therefore, we use the language as proposed in R11. No change made.</p> <p>It does not mean that a DP or GOP must comply with the wishes of its TOP or BA because as you state that could be beyond the control of the DP or GOP. However, what transpires in the consultation is a realization of the situation, what the impacts to reliability are and a determination of what is amicable to both parties. No change made. The RCSDT has made clarifying changes to R11 to use mutually agreeable action rather than time for restoration.</p> <p>In addition, entities will have to keep evidence to show that a “mutually” agreeable time was reached by two or more entities. The most workable solution would be to require notification if primary Interpersonal Communication is lost and a follow-up notification when that capability is restored.</p> <p>The RCSDT notes that R11 does not limit the sources of information used by the DP or GOP in establishing a mutually agreeable restoration action for its Interpersonal Communication capability with its TOP or BA; that is precisely why R11 is written in</p>

Organization	Yes or No	Question 4 Comment
		<p>this manner. This allows flexibility on the part of the TOP and BA in determining when the Interpersonal Communication capability must be restored. In situations where there is little or no impact to the reliability of the BES, some flexibility could be allowed without requiring the acquisition of Alternative Interpersonal Communication capability. No change made.</p>
<p>Response: See response above.</p>		
<p>NextEra Energy, Inc.</p>	<p>No</p>	<p>NextEra Energy, Inc. (NextEra), which includes Florida Power & Light Company, believes that Requirement 11 of COM-001-2, as drafted, is too vague to be adopted as a mandatory Reliability Standard.</p> <p>For example, it is unclear what is meant by “shall consult.” The North American Electric Reliability Corporation’s (NERC) Rules of Procedure state that a foundation of any Reliability Standard is that: “. . . [the] reliability standard shall be stated using clear and unambiguous language. Responsible entities, using reasonable judgment and in keeping with good utility practices, are able to arrive at a consistent interpretation of the required performance.” The term “shall consult” is not a term generally understood or used in the electric utility industry, and, therefore, does not enable a consistent interpretation of the performance required. Accordingly, NextEra requests that Requirement 11 either:</p> <ul style="list-style-type: none"> (i) be deleted; or (ii) be redrafted to read more like Requirement 10.
<p>Response: The RCSDT believes the term, “consult,” is well understood. Basically, entities must have a conversation. No change made.</p>		
<p>Manitoba Hydro</p>	<p>No</p>	<p>COM-001-2 R11 does not specify a timeline in which entities have to come up with a ‘mutually agreeable’ time to restore Interpersonal Communication capability. Manitoba Hydro believes this omission creates a reliability gap and suggests that wording be revised as follows: ‘... shall consult with their Transmission Operator or</p>

Organization	Yes or No	Question 4 Comment
		Balancing Authority as applicable and determine a mutually agreeable time to restore the Interpersonal Communication capability within 24 hours of experiencing the failure.'
<p>Response: The RCSDT has made clarifying changes to R11 to use mutually agreeable action rather than time for restoration. The RCSDT believes R11 grants the DP and GOP flexibility in determining, in conjunction with its TOP or BA, when its Interpersonal Communication capability must be restored. This would provide allowances for those entities, which have little or no impact on the reliability of the BES while not requiring them to obtain Alternative Interpersonal Communication capabilities. No change made.</p>		
Great River Energy	No	Capability is not used consistently in R7 and R11. It changes from singular to plural.
<p>Response: The RCSDT thanks you for your observation. Generally, the singular implies the plural or vice-versa. The RCSDT has corrected R10 and R11 to be consistent with the singular application.</p>		
American Electric Power	No	Regarding COM-001-02 R10 and R11, some of the entity pairs (for example, BA to a GO) are not required to have alternative inter-personnel communication. How can the notification occur with 60 minutes for example, when primary communication is not available for a role that doesn't require an alternate means of communication? In addition, requiring notification within 60 minutes in Requirement 10 would not be feasible for larger entities that might have hundreds of contacts to make.
<p>Response: The RCSDT thanks you for your comment. The notification within 60 minutes found in R10 pertains to the BA, RC and TOP; therefore, these entities are required to have designated Alternative Interpersonal Communication capability with other entities and more specifically other BA, TOP and RC entities. It is understood by virtue of R11 that the DP and GOP may not have Alternative Interpersonal Communication capability and may not be notified within 60 minutes. No change made.</p>		
Georgia Transmission Corporation	No	The intent of this requirement is not yet clear. Technically, the air we breathe, as well as other mediums like "any" cell phone, fax lines, and/or email accounts would qualify under this proposed definition of Interpersonal Communication. The burden for compliance evidence to demonstrate failure of "any of its Interpersonal Communication capability" would seem unobtainable and could prove to be a daily

Organization	Yes or No	Question 4 Comment
		<p>occurrence (dropped phone calls, etc.). The following is suggested to utilize the singular form of capability rather than plural form of capabilities:</p> <p><i>R11. Each Distribution Provider and Generator Operator that experiences a failure of its Interpersonal Communication capability shall consult with their Transmission Operator or Balancing Authority as applicable to determine a mutually agreeable time to restore the Interpersonal Communication capability.</i></p>
<p>Response: The RCSDT appreciates your comment and has made clarifying changes by removing the phrase “any of” in COM-001, R11. Additionally, the RCSDT made a clarifying change to indicate the DP and GOP only need to consult with the entity affected by the failure.</p>		
Nebraska Public Power District	No	<p>We would suggest deleting the phrase ‘any of’ in the Requirement. It would then read:</p> <p><i>‘Each DP and GOP that experiences a failure of its Interpersonal Communication...’</i></p> <p>The RCSDT appreciates your comment and has made clarifying changes by removing the phrase “any of” in COM-001, R11. Additionally, the RCSDT made a clarifying change to indicate the DP and GOP only need to consult with the entity affected by the failure.</p> <p>Also, how does the DP or GOP consult with its TOP or BA when it loses its Interpersonal Communications capability?</p> <p>To do this wouldn’t they have to have an Alternative Interpersonal Communications capability?</p> <p>The RCSDT notes that R11 does not limit the sources of information used by the DP or GOP in establishing mutually agreeable action for restoration for its Interpersonal Communication capability with its TOP or BA; that is precisely why R11 is written in this manner. This allows flexibility on the part of the TOP and BA in determining when the Interpersonal Communication capability must be restored. In situations where there is little or no impact to the reliability of the BES, some flexibility could be</p>

Organization	Yes or No	Question 4 Comment
		allowed without requiring the acquisition of Alternative Interpersonal Communication capability. No change made.
Response: See response above.		
Georgia System Operations	No	<p>The intent of this requirement is not yet clear. Technically, the air we breathe, as well as other mediums like “any” cell phone, fax lines, and/or email accounts would qualify under this proposed definition of Interpersonal Communication. The burden for compliance evidence to demonstrate failure of “any of its Interpersonal Communication capability” would seem unobtainable and could prove to be a daily occurrence (dropped phone calls, etc.). The following is suggested:</p> <p><i>R11. Each Distribution Provider and Generator Operator that experiences a failure of any of its Interpersonal Communication capability shall consult with their Transmission Operator or Balancing Authority as applicable to determine a mutually agreeable time to restore the Interpersonal Communication capability.</i></p>
Response: The RCSDT appreciates your comment and has made clarifying changes by removing the phrase “any of” in COM-001, R11. Additionally, the RCSDT made a clarifying change to indicate the DP and GOP only need to consult with the entity affected by the failure.		
Ingleside Cogeneration LP	No	<p>Most of Ingleside Cogeneration’s communications capabilities rely on carriers who will immediately deploy technicians to repair land-based or wireless systems when they break. Although we may contact the carrier to inform them that the systems are not available – or to determine their progress – we do not want them waiting for our go-ahead before proceeding. If the intent of this requirement is to validate the operation of the repaired connection, or to establish interim means of communications with other operating entities, then Ingleside Cogeneration believes a re-write is in order. There is no reliability purpose being served otherwise that we can tell.</p>
Response: The RCSDT believes there is nothing in R11 that says repairs by communication technicians should wait on anyone for a		

Organization	Yes or No	Question 4 Comment
		<p>go-ahead. The RCSDT sees it working this way: When a communication link goes down, a communication technician is dispatched as soon as the failure is noted and according to the agreements regarding repair between the provider and the user. When the user contacts the provider, an estimate of the anticipated repair time should be provided. One would expect this type of arrangement in service agreements. The user, DP or GOP, then takes that time to the consultation with the TOP or BA. Based on this anticipated restoration time and the impact the DP or GOP has on the reliability of the BES, a mutually agreed to restoration action is established. No change made.</p>
<p>Duke Energy</p>	<p>No</p>	<p>The phrase “consult with... to determine a mutually agreeable time” makes this requirement too open-ended to be auditable and enforceable.</p> <p>The RCSDT has made clarifying changes to R11 to use mutually agreeable action rather than time for restoration.</p> <p>We question why R11 does not establish a timeframe for notification similar to R10, which requires the RC, TOP or BA to make notification within 60 minutes of failure detection.</p> <p>The RCSDT thanks you for your comment. The notification within 60 minutes found in R10 pertains to the BA, RC and TOP; therefore, these entities are required to have designated Alternative Interpersonal Communication capability with other entities and more specifically other BA, TOP and RC entities. It is understood by virtue of R11 that the DP and GOP would not have Alternative Interpersonal Communication capability and would not be notified within 60 minutes. No change made.</p> <p>We also question why DPs and GOPs are not required to have Alternative Interpersonal Communications capability in order to be able to make such notifications.</p> <p>The RCSDT believes that R11 grants the DP and GOP flexibility in determining, in conjunction with its TOP or BA, when its Interpersonal Communication capability must be restored. This would provide allowances for those entities which have little or no impact on the reliability of the BES while not requiring them to obtain Alternative Interpersonal Communication capabilities. The requirement allows flexibility in “consult with” by not naming the method. If all communications are out,</p>

Organization	Yes or No	Question 4 Comment
		then the DP or GOP may have to meet the requirement by an in-person consultation. No change made.
Response: See response above.		
ISO New England	No	ISO-NE does not believe COM-001, in its entirety, is a results-based standards and therefore does not support the draft as written. We believe such “requirements” (i.e. capabilities) should be verified through an entity certification process. Additionally, results-based requirements should be the driver to have the capability to achieve them; on other words, there is no other way to reliably dispatch than to have communications facilities (electronic or voice).
Response: Although this is not a results-based standard, the RCSDT believes it is a significant improvement over the current COM-001 standard. No change made.		
ReliabilityFirst	No	ReliabilityFirst believes Distribution Provider and Generator Operator should be added to Requirement R10 and Requirement R11 should be removed. Finite time frames should be prescribed for each Distribution Provider and Generator Operator that experiences a failure of any of its Interpersonal Communication capabilities. ReliabilityFirst believes that the failure of Interpersonal Communication between Distribution Providers/Generator Operators and Transmission Operators/Balancing Authorities could have the same negative effects similar to the failure of Interpersonal Communication by the Reliability Coordinator, Transmission Operator, and Balancing Authority.
Response: If the RCSDT made the changes proposed, the standards loses the flexibility of the TOP and BA to work with DPs and GOPs which have little or no adverse reliability impact on the BES. The RCSDT feels we need to maintain this flexibility. In fact, FERC directed NERC to do so in Order 693. No change made.		
City of Vero Beach	No	By use of the term “any” in the phrase “a failure of any of its Interpersonal

Organization	Yes or No	Question 4 Comment
		<p>Communication” the standard will actually create a disincentive for redundant communications with DPs and GOPs due to compliance risk.</p> <p>The RCSDT appreciates your comment and has made clarifying changes by removing the phrase “any of” in COM-001, R11. Additionally, the RCSDT made a clarifying change to indicate the DP and GOP only need to consult with the entity affected by the failure.</p> <p>To truly further the goals of reliability, the requirement should align with R3.3 and R3.4 which requires a primary Interpersonal Communications capability and R4 which does not require DPs or GOPs to have Alternative Interpersonal Communications capability. A possible solution is through use of the terms “Primary” for R3 and “Alternate” for R4 and then make R11 applicable to Primary only.</p> <p>The RCSDT deliberately stayed away from the use of primary and secondary mediums and prefers to use communications capabilities. Further, the RCSDT has gone to great lengths to provide some flexibility for those DPs and GOPs with little or no impact on the reliability of the BES. FERC directed NERC to provide for this consideration. Therefore, we use the language as proposed in R11. Mutually agreeable implies that both parties are willing to accept the outcome. It doesn’t mean that a DP or GOP must comply with the wishes of its TOP or BA because as you state that could be beyond the control of the DP or GOP. But what transpires in the consultation is a realization of what the situation is, what the impacts to reliability are and a determination of what is amicable to both parties. No change made.</p> <p>The RCSDT emphasizes the requirement refers only to Interpersonal Communication capabilities. Adding the phrase “to the primary” is not needed. Please refer to the definitions of Interpersonal Communication and Alternative Interpersonal Communication for clarification. No change made.</p>
<p>Response: See response above.</p>		
Midwest Independent	No	MISO requests clarification regarding

Organization	Yes or No	Question 4 Comment
Transmission System Operator		<p>(1) when Distribution Providers/Generator Operators have an obligation to collaborate with Transmission Operators versus Balancing Authorities; and</p> <p>(2) the obligation of Transmission Operators to inform Balancing Authorities (and vice versa) of an agreed upon time for restoration of Interpersonal Communication capability when collaboration occurs only between Transmission Operators and Distribution Providers/Generator Operators or, conversely, Balancing Authorities and Distribution Providers/Generator Operators.</p>
<p>Response: The RCSDT believes, (1) As specified in R11, the DP and GOP have an obligation to consult with their TOP and/or BA with who they are experiencing an Interpersonal Communication capability failure. If the DP or GOP experiences a failure with the TOP, then they consult with the TOP. If that failure is with the BA, they consult with the BA. If the failure is with both the TOP and BA, they consult with both. (2) There is no such obligation. Both the TOP and BA are required to have Alternative Interpersonal Communication capability, which would be used as a substitute for the Interpersonal Communication capability. No change made.</p>		
Texas Reliability Entity	No	<p>(1) Why does R10 refer to “failure of its Interpersonal Communications capabilities” while R11 refers to “failure of **any of** its Interpersonal Communications capabilities”?</p> <p>What is the distinction that is intended by addition of the words “any of”?</p> <p>The RCSDT appreciates your comment and has made clarifying changes by removing the phrase “any of” in COM-001, R11. Additionally, the RCSDT made a clarifying change to indicate the DP and GOP only need to consult with the entity affected by the failure.</p> <p>(2) As a Compliance Enforcement Authority, we have several fundamental questions regarding what is intended in this standard. It appears the drafting team is using the defined term “Interpersonal Communications” to refer to a designated primary communication medium, and the term “Alternative Interpersonal Communications” to refer to one or more designated backup communication mediums.</p> <p>Is that correct?</p>

Organization	Yes or No	Question 4 Comment
		<p>This should be clarified in the Standard.</p> <p>(2) The RCSDT deliberately stayed away from the use of primary and secondary mediums and prefers to use communications capabilities. However, you are correct in considering the Alternative Interpersonal Communication capability as a substitute for the Interpersonal Communication capability, as specified in their respective definitions. No change made.</p> <p>(3) There is ambiguity in the current draft because the defined term “Interpersonal Communications” appears to include primary, back-up and all other mediums that may be available (which may include landline phone, cell phone, satellite phone, instant messaging, email, and data links, all in one facility), including any “Alternative Interpersonal Communications.”</p> <p>(3) Interpersonal Communication capability could use any of the mediums mentioned in your comment. Likewise, the Alternative Interpersonal Communication capability could be any of those mediums, as well, provided that it did not use the same infrastructure as the Interpersonal Communication capability. No change made.</p> <p>Do R10 and R11 apply to ALL available mediums, or just to the designated primary and back-up mediums?</p> <p>Does R9 apply to ALL available back-up mediums, or just to a specifically designated back-up medium?</p> <p>The RCSDT deliberately stayed away from the use of primary and secondary mediums and prefers to use communications capabilities. Further, the RCSDT has gone to great lengths to provide some flexibility for those DPs and GOPs with little or no impact on the reliability of the BES. FERC directed NERC to provide for this consideration. Therefore, we use the language as proposed in R11. Mutually agreeable implies that both parties are willing to accept the outcome. It doesn’t mean that a DP or GOP must comply with the wishes of its TOP or BA because as you state that could be beyond the control of the DP or GOP. But what transpires in the consultation is a realization of what the situation is, what the impacts to reliability are</p>

Organization	Yes or No	Question 4 Comment
		and a determination of what is amicable to both parties. No change made.
Response: See response above.		
Dominion	Yes	<p>Dominion agrees with the intent of R11; however, suggest language changes for consistency with R10 as follows:</p> <p><i>R11. Each Distribution Provider and Generator Operator that experiences a failure of any of its Interpersonal Communication capabilities shall consult with their Transmission Operator or Balancing Authority as applicable to determine a mutually agreeable time to restore the Interpersonal Communication capability. [Violation Risk Factor: Medium][Time Horizon: Real-time Operations]</i></p>
Response: The RCSDT has made clarifying changes to R11 to use mutually agreeable action, rather than time for restoration.		
NV Energy	Yes	Agree, however, the ability for a DP or GOP to have such consultation with its TOP or BA would likely be hampered by the failure of the Interpersonal Communications itself. DP and GOP are only required to have a single source for this Interpersonal Communications.
Response: RCSDT did not want to burden the DP and GOP with having Alternative Interpersonal Communication capability based on Paragraph 508 of Order No. 693. There are multiple avenues of communication technology available to comply with R11. No change made.		
NIPSCO		If the Interpersonal Communication is down, and no backup is required for the DP and GOP, how are they to consult and collaborate?
Response: RCSDT did not want to burden the DP and GOP with having Alternative Interpersonal Communication capability based on Paragraph 508 of Order No. 693. There are multiple avenues of communication technology available to comply with R11. No change made.		
City of Tacoma, Department	Yes	

Organization	Yes or No	Question 4 Comment
of Public Utilities, Light Division, dba Tacoma Power		
Bonneville Power Administration	Yes	
Southwest Power Pool Regional Entity	Yes	
MISO Standards Collaborators	Yes	
Salt River Project	Yes	
San Diego Gas & Electric	Yes	
Xcel Energy	Yes	
Independent Electricity System Operator	Yes	
Oncor Electric Delivery Company LLC	Yes	
City of Jacksonville Beach dba/ Beaches Energy Services	Yes	
Luminant Energy Company LLC	Yes	
Pepco Holdings Inc.	Yes	

Organization	Yes or No	Question 4 Comment
Exelon	Yes	
Niagara Mohawk (dba National Grid)	Yes	
South Carolina Electric and Gas	Yes	
BGE	Yes	
ERCOT ISO	Yes	
Hydro One Networks Inc.	Yes	
American Transmission Company, LLC	Yes	

5. The proposed definition of Reliability Directive shown in COM-002-3 was revised to include Adverse Reliability Impact as shown to more fully address emergencies or events that might lead to instability or Cascading: Reliability Directive: A communication initiated by a Reliability Coordinator, Transmission Operator or Balancing Authority where action by the recipient is necessary to address an Emergency or Adverse Reliability Impact. Do you agree with the proposed definition? If not, please explain in the comment area below.

Summary Consideration: There were a significant number of comments about the definition of Reliability Directive with accompanying suggested language; for example, having the definition to prescribe a level of performance. The practice of writing a level of performance within a definition is discouraged and generally prevents future use of the term. Several comments pertained to compliance with the requirements; for example, would an entity be required to use three-part communication for a voltage schedule? The requirements do not preclude an entity from doing so; however, the requirements focus on the situation of addressing an Emergency or Adverse Reliability Impact. Other concerns were raised that the terms “Emergency” and “Adverse Reliability Impact” are the same. The RCSDT believes these terms capture independent conditions. The term “Emergency” implies situations where the event is anticipated or currently happening. Likewise, Adverse Reliability Impact clearly identifies a potential or actual event in the phrase, “an event that results in.” The RCSDT notes the definition of Adverse Reliability Impact is the revised term, which is NERC Board of Trustees adopted and is pending regulatory filing in IRO-014-2. Additionally, using the currently adopted version does not capture the full spectrum of the proposed definition by the RCSDT.

The development of the term Reliability Directive concept places a heightened awareness on actions that are required to avoid an Adverse Reliability Impact. Additionally, the use of “direct” is consistent with the uses of “direct” in other standards. A commenter had a concern about the removal of “issued in a clear, concise, and definitive manner” would lead to repeating the process. The RCSDT believes it to be in the interest of the issuer to do this without the burden of a requirement. Additionally, this type of requirement would be difficult to measure and by virtue of the issuer having to confirm the Reliability Directive; it is to the issuer’s advantage to be clear for efficient communications. Other minor formatting and corrections to references were made to align requirements, measures, and compliance components. Several other comments were made that are addressed in the questions above.

Organization	Yes or No	Question 5 Comment
Constellation Power Source Generation, Inc.	Negative	As we commented on Project 2007-03 TOP-001-2, the definition of Reliability Directive is an improvement but the definition must capture the identification concept that is reflected in the Requirement (R1). As a result, when Reliability

Organization	Yes or No	Question 5 Comment
		<p>Directive is used elsewhere, it would be clear that the communication must be identified as a Reliability Directive.</p> <p>We suggest the following revision to the definition and it should follow through to Project 2006-06 IRO-001-3 and Project 2007-03 TOP-001-2, eventually being added to the Reliability Standards Glossary of Terms.</p> <p><i>A communication identified as a Reliability Directive by a Reliability Coordinator, Transmission Operator, or Balancing Authority to initiate action by the recipient to address an Emergency or Adverse Reliability Impact.</i></p> <p>The RCSDT thanks you for your comment; however, the suggested improvement is addressed in the requirement COM-002-3, R1 (see below). Definitions should avoid a structure that identifies an action or performance of an entity. The Standard Processes Manual (SPM), “Process for Developing a Defined Term”, Page 22 states in the first paragraph: “Definitions shall not contain statements of performance Requirements.” No change made.</p> <p>“R1. When a Reliability Coordinator, Transmission Operator or Balancing Authority requires actions to be executed as a Reliability Directive, the Reliability Coordinator, Transmission Operator or Balancing Authority shall identify the action as a Reliability Directive to the recipient. [Violation Risk Factor: High][Time Horizon: Real-Time]”</p> <p>IRO-001-3 uses the term ‘direct’ in its purpose statement, R1, R2 and R3. To avoid confusion with a Reliability Directive (both for auditors and entities), we suggest the following:</p> <p>To establish the authority of Reliability Coordinators to make requests of other entities to prevent an Emergency or Adverse Reliability Impacts to the Bulk Electric System.</p> <p><i>R1: Each Reliability Coordinator shall have the authority to act or request others to act (which could include issuing Reliability Directives) to prevent identified events or mitigate the magnitude or duration of actual events that result in an Emergency or</i></p>

Organization	Yes or No	Question 5 Comment
		<p><i>Adverse Reliability Impacts.</i></p> <p><i>R2: Each Transmission Operator, Balancing Authority, Generator Operator, Distribution Provider shall comply with its Reliability Coordinator’s request unless compliance with the request cannot be physically implemented, or unless such actions would violate safety, equipment, regulatory or statutory requirements, or unless the TOP, BA, GOP or DP convey a business reason not to comply with the request but express that they will comply if a Reliability Directive is given.</i></p> <p><i>R3: Each Transmission Operator, Balancing Authority, Generator Operator, and Distribution Provider shall inform its Reliability Coordinator upon recognition of its inability to perform as requested in accordance with Requirement R2.</i></p> <p>The RCSDT feels the use of direct and directed is consistent with the purpose and application of those terms in other standards. The RCSDT believes using the word “request” makes the requirement conditional and is not consistent with the purpose of the standard. No change made.</p>
<p>Response: See response above.</p>		
<p>MidAmerican Energy Co.</p>	<p>Negative</p>	<p>Do not nest definitions.</p> <p>The use of the word “any” in the COM-002-3 and IRO-001-3 definition of “Emergency” is too broad and should be deleted. The use of “any” in regulatory standards almost always causes unintended consequences.</p> <p>The RCSDT appreciates your comment and has made clarifying changes by removing the phrase “any of” in COM-001, R11. Additionally, the RCSDT made a clarifying change to indicate the DP and GOP only need to consult with the entity affected by the failure.</p> <p>The definition should be shortened to read:</p> <p><i>“Abnormal system condition that requires automatic or immediate manual actions to prevent or limit Bulk Electric System transmission facility or generation failures that</i></p>

Organization	Yes or No	Question 5 Comment
		<p><i>could result in instability, uncontrolled separation, or cascading.”</i></p> <p>The RCSDT appreciates the suggested rewording of the definition. The suggestion creates a disconnect with the already approved NERC glossary term. Additionally, the proposed definition adds new words which were not included originally. The RCSDT does not propose a new definition of Emergency. No change made.</p>
<p>Response: See response above.</p>		
<p>Tennessee Valley Authority</p>	<p>Negative</p>	<p>We suggest adding the words “and identified as a reliability directive to the recipient” at the end of the definition of Reliability Directive.</p> <p>The RCSDT thanks you for your comment; however, the suggested improvement is addressed in the requirement COM-002-3, R1 (see below). Definitions should avoid a structure that identifies an action or performance of an entity. The Standard Processes Manual (SPM), “Process for Developing a Defined Term”, Page 22 states in the first paragraph: “Definitions shall not contain statements of performance Requirements.” No change made.</p> <p>“R1. When a Reliability Coordinator, Transmission Operator or Balancing Authority requires actions to be executed as a Reliability Directive, the Reliability Coordinator, Transmission Operator or Balancing Authority shall identify the action as a Reliability Directive to the recipient. [Violation Risk Factor: High][Time Horizon: Real-Time]”</p> <p>For R2, we question the phrase “physically implemented” and recommend that the intent be clarified in the language.</p> <p>The RCSDT believes there may be conditions where an entity may not be able to physically implement the direction; for example, an entity that does not have the right to access certain equipment or cannot manually operate a broken apparatus. We feel the proposed language achieves the intended purpose. No change made.</p>
<p>Response: See response above.</p>		

Organization	Yes or No	Question 5 Comment
SERC OC Standards Review Group	No	<p>We suggest adding the words “and identified as a reliability directive to the recipient” at the end of the definition of Reliability Directive. As written, this definition could lead to a dispute of what communications are Reliability Directives; leading to further dispute as to what Requirements are applicable. By adding this clarity in the definition of this term, clarity will not be needed in the application of this definition as is proposed in COM-002-3, Req 1.</p> <p>This would allow the removal of R1 from COM-002-3</p>
<p>Response: The RCSDT thanks you for your comment; however, the suggested improvement is addressed in the requirement COM-002-3, R1 (see below). Definitions should avoid a structure that identifies an action or performance of an entity. The Standard Processes Manual (SPM), “Process for Developing a Defined Term”, Page 22 states in the first paragraph: “Definitions shall not contain statements of performance Requirements.” No change made.</p> <p>“R1. When a Reliability Coordinator, Transmission Operator or Balancing Authority requires actions to be executed as a Reliability Directive, the Reliability Coordinator, Transmission Operator or Balancing Authority shall identify the action as a Reliability Directive to the recipient. [Violation Risk Factor: High][Time Horizon: Real-Time]”</p>		
CCG, CPG, CECD	No	<p>As we commented on Project 2007-03 TOP-001-2, the definition of Reliability Directive is an improvement but the definition must capture the identification concept that is reflected in the Requirement (R1). As a result, when Reliability Directive is used elsewhere, it would be clear that the communication must be identified as a Reliability Directive.</p> <p>We suggest the following revision to the definition and it should follow through to Project 2006-06 IRO-001-3 and Project 2007-03 TOP-001-2, eventually being added to the Reliability Standards Glossary of Terms.</p> <p><i>“A communication identified as a Reliability Directive by a Reliability Coordinator, Transmission Operator, or Balancing Authority to initiate action by the recipient to address an Emergency or Adverse Reliability Impact.”</i></p>
<p>Response: The RCSDT thanks you for your comment; however, the suggested improvement is addressed in the requirement COM-</p>		

Organization	Yes or No	Question 5 Comment
<p>002-3, R1 (see below). Definitions should avoid a structure that identifies an action or performance of an entity. The Standard Processes Manual (SPM), “Process for Developing a Defined Term”, Page 22 states in the first paragraph: “Definitions shall not contain statements of performance Requirements.” No change made.</p> <p>“R1. When a Reliability Coordinator, Transmission Operator or Balancing Authority requires actions to be executed as a Reliability Directive, the Reliability Coordinator, Transmission Operator or Balancing Authority shall identify the action as a Reliability Directive to the recipient. [Violation Risk Factor: High][Time Horizon: Real-Time]”</p>		
<p>Arizona Public Service Company</p>	<p>No</p>	<p>There is a risk of not properly identifying an abnormal condition (Emergency or Adverse Reliability Impact) in time to require specific use of the statement ‘this is a Reliability Directive’ when issuing switching on the system in the event of an emergency.</p> <p>The RCSDT believes that it is the responsibility of each entity to identify abnormal conditions when it requires an action to be executed as a Reliability Directive. If conditions are not identified as having Emergency or Adverse Reliability Impact, then the requirement is not applicable. No change made.</p> <p>This is a deviation from consistently using 3-way communication when an emergency occurs. It may not be apparent that an emergency exists and breaking from consistent use of expected 3-way communication could cause confusion.</p> <p>The RCSDT believes this does not preclude an entity from utilizing 3-part communications for activities other than Reliability Directives. No change made.</p>
<p>Response: See response above.</p>		
<p>Southern Company</p>	<p>No</p>	<p>This definition would encompass more communication than is now included. The definition now requires that a directive be declared as a part of the three part communication. For example, sending out the voltage schedule each morning would be included as a directive using the new definition.</p> <p>The RCSDT thanks you for your comment; however, we believe the definition of Reliability Directive is specific in the nature of the communication while providing</p>

Organization	Yes or No	Question 5 Comment
		<p>adequate flexibility for the responsible entity to define those conditions that would rise to the level of a Reliability Directive. No change made.</p> <p>We suggest adding the words “and identified as a reliability directive to the recipient” at the end of the definition of Reliability Directive. This would allow the removal of R1 from COM-002-3</p> <p>The RCSDT thanks you for your comment; however, the suggested improvement is addressed in the requirement COM-002-3, R1 (see below). Definitions should avoid a structure that identifies an action or performance of an entity. The Standard Processes Manual (SPM), “Process for Developing a Defined Term”, Page 22 states in the first paragraph: “Definitions shall not contain statements of performance Requirements.” No change made.</p> <p>“R1. When a Reliability Coordinator, Transmission Operator or Balancing Authority requires actions to be executed as a Reliability Directive, the Reliability Coordinator, Transmission Operator or Balancing Authority shall identify the action as a Reliability Directive to the recipient. [Violation Risk Factor: High][Time Horizon: Real-Time]”</p>
<p>Response: See response above.</p>		
Entergy Services, Inc	No	<p>An Adverse Reliability Impact is a type of Emergency. Including a new term for Adverse Reliability Impact and including both terms in the definition for Reliability Directive doesn’t add clarity. I suggest changing the definition for Reliability Directive to remove phrase “or Adverse Reliability Impact.”</p>
<p>Response: The RCSDT thanks you for your comment; however, the RCSDT believes the definition captures two independent conditions, anticipated and after or post event. The definition of Emergency implies situations where the event is anticipated or currently happening. Likewise, the definition of Adverse Reliability Impact clearly identifies as a potential or actual event in the phrase, “an event that results in.” Both conditions are important to the definition. The RCSDT notes that the term, “Adverse Reliability Impact,” is a currently defined NERC Glossary term; however, the term as it appears in the standard is the revised term, which is NERC Board of Trustee adopted and pending regulatory filing in IRO-014-2: “The impact of an event that results in Bulk</p>		

Organization	Yes or No	Question 5 Comment
Electric System instability or Cascading.” No change made.		
NextEra Energy, Inc.	No	<p>NextEra objects to the use of “Adverse Reliability Impact” in Reliability Standards COM-002-3 and IRO-001-3. NextEra requests that the use of Adverse Reliability Impact be revised as suggested below or it be deleted from the definition of Reliability Directive. NextEra does not agree with the use of Adverse Reliability Impact in the definition of “Reliability Directive” for the following reasons:</p> <ol style="list-style-type: none"> 1. This term Adverse Reliability Impact is ambiguous. In part, the term is ambiguous because it includes in its definition the term “instability,” which has lead to considerable misunderstanding and confusion in the industry. There are also differing views on what is (and is not) Cascading, because the definition is not sufficiently clear. For example, some believe instability and Cascading occur when an event affects multiple substations of one Transmission Operator, while others believe instability or Cascading only occur when the event affects more than one Transmission Operator’s system. As mentioned in response to item 4, above, Reliability Standards must be clear and consistently interpreted. It is not appropriate to issue a Standard that perpetuates the use of terms that lack consistent interpretation. 2. While not perfect, the term Emergency is better understood in the industry, and it may include many or all of the instances of instability or Cascading intended to be captured by Adverse Reliability Impact. Consequently, it is not advisable to introduce Adverse Reliability Impact as a new term, when it is not clearly distinguishable from Emergency. NextEra is concerned that an unclear and imprecise term, such as Adverse Reliability Impact, does not promote reliability, and, such a term is particularly troublesome in the context of real time system operations. Therefore, for the reasons stated above, NextEra believes that the term Adverse Reliability Impact should be deleted from the definition of Reliability Directive. In the alternative, if Adverse Reliability Impact is not deleted from the definition of Reliability Directive in Reliability Standards COM-002-3 and IRO-001-3, NextEra

Organization	Yes or No	Question 5 Comment
		<p>requests that Adverse Reliability Impact be revised to read:</p> <p><i>“an event or condition on the Bulk Electric System that may, or is leading to, Cascading over more than one Bulk Electric System transmission system.”</i></p>
<p>Response: The RCSDT thanks you for your comment; however, the RCSDT believes the definition captures two independent conditions, anticipated and after or post event. The definition of Emergency implies situations where the event is anticipated or currently happening. Likewise, the definition of Adverse Reliability Impact clearly identifies as a potential or actual event in the phrase, “an event that results in.” Both conditions are important to the definition. The RCSDT notes that the term, “Adverse Reliability Impact,” is a currently defined NERC Glossary term; however, the term as it appears in the standard is the revised term, which is NERC Board of Trustee adopted and pending regulatory filing in IRO-014-2: “The impact of an event that results in Bulk Electric System instability or Cascading.” No change made.</p>		
Niagara Mohawk (dba National Grid)	No	<p>The "adverse reliability impact" definition is not clear, is this an actual event or contingency? The words imply it is an actual event, which is already covered in the "Directive" definition. If the intent is to apply directives to potential stability or cascading contingencies it should say so.</p>
<p>Response: The RCSDT notes that the term, “Adverse Reliability Impact,” is a currently defined NERC Glossary term; however, the term as it appears in the standard is the revised term, which is NERC Board of Trustee adopted and pending regulatory filing in IRO-014-2: “The impact of an event that results in Bulk Electric System instability or Cascading.” The pending definition covers the application to potential instability and cascading conditions. The RCSDT included the phrase “to address” in the proposed definition of “Reliability Directive” to account for (1) potential and (2) actual events leading to an Emergency or Adverse Reliability Impact.” No change made.</p>		
BGE	No	<p>BGE would prefer that the definition of Reliability Directive include the requirement to identify the fact that a Reliability Directive is being issued. See the following proposed definition:</p> <p><i>Reliability Directive: A communication initiated and identified as a Reliability Directive, by a Reliability Coordinator, Transmission Operator or Balancing Authority where action by the recipient is necessary to address an Emergency or Adverse</i></p>

Organization	Yes or No	Question 5 Comment
		<i>Reliability Impact.</i>
<p>Response: The RCSDT thanks you for your comment; however, the suggested improvement is addressed in the requirement COM-002-3, R1 (see below). Definitions should avoid a structure that identifies an action or performance of an entity. The Standard Processes Manual (SPM), “Process for Developing a Defined Term”, Page 22 states in the first paragraph: “Definitions shall not contain statements of performance Requirements.” No change made.</p> <p>“R1. When a Reliability Coordinator, Transmission Operator or Balancing Authority requires actions to be executed as a Reliability Directive, the Reliability Coordinator, Transmission Operator or Balancing Authority shall identify the action as a Reliability Directive to the recipient. [Violation Risk Factor: High][Time Horizon: Real-Time]”</p>		
Duke Energy	No	<p>-Since FERC has not yet approved the new definition of Adverse Reliability Impact, we believe the term “Adverse Reliability Impact” should be replaced by the words of the BOT-approved definition: “the impact of an event that results in Bulk Electric System instability or Cascading.”</p> <p>The RCSDT notes that the term, “Adverse Reliability Impact,” is a currently defined NERC Glossary term; however, the term as it appears in the standard is the revised term, which is NERC Board of Trustee adopted and pending regulatory filing in IRO-014-2: “The impact of an event that results in Bulk Electric System instability or Cascading.” The RCSDT thanks you for your comment; however, by inserting the text of the currently adopted version of the Adverse Reliability Impact definition would create a loss of continuity in the intent of the pending definition. No change made.</p> <p>-Also, add the phrase “and the communication is identified as a reliability directive to the recipient” to the end of the definition of Reliability Directive. This will eliminate potential confusion regarding when a communication is a Reliability Directive, and when a communication is a routine instruction. Revising the definition in this manner may also eliminate the need Requirement R1 of COM-002-3.</p> <p>If R1 is retained, we suggest rewording as follows:</p> <p><i>“Each Reliability Coordinator, Transmission Operator, or Balancing Authority shall identify a Reliability Directive to the recipient when it issues a Reliability Directive</i></p>

Organization	Yes or No	Question 5 Comment
		<p><i>that requires an action or actions to be executed.”</i></p> <p>The RCSDT thanks you for your comment; however, the suggested improvement is addressed in the requirement COM-002-3, R1 (see below). Definitions should avoid a structure that identifies an action or performance of an entity. The Standard Processes Manual (SPM), “Process for Developing a Defined Term”, Page 22 states in the first paragraph: “Definitions shall not contain statements of performance Requirements.” No change made.</p> <p>“R1. When a Reliability Coordinator, Transmission Operator or Balancing Authority requires actions to be executed as a Reliability Directive, the Reliability Coordinator, Transmission Operator or Balancing Authority shall identify the action as a Reliability Directive to the recipient. [Violation Risk Factor: High][Time Horizon: Real-Time]”</p> <p>-Proposed reworded definition:</p> <p><i>“Reliability Directive: A communication initiated by a Reliability Coordinator, Transmission Operator, or Balancing Authority where action by the recipient is necessary to address an Emergency or the impact of an event that results in Bulk Electric System instability or Cascading, and the communication is identified as a Reliability Directive to the recipient.”</i></p> <p>The RCSDT thanks you for your comment; however, the suggested improvement is addressed in the requirement COM-002-3, R1 (see below). Definitions should avoid a structure that identifies an action or performance of an entity. The Standard Processes Manual (SPM), “Process for Developing a Defined Term”, Page 22 states in the first paragraph: “Definitions shall not contain statements of performance Requirements.” No change made.</p> <p>“R1. When a Reliability Coordinator, Transmission Operator or Balancing Authority requires actions to be executed as a Reliability Directive, the Reliability Coordinator, Transmission Operator or Balancing Authority shall identify the action as a Reliability Directive to the recipient. [Violation Risk Factor: High][Time Horizon: Real-Time]”</p>

Organization	Yes or No	Question 5 Comment
<p>Response: See response above.</p>		
<p>ReliabilityFirst</p>	<p>No</p>	<p>ReliabilityFirst believes the definition of “Reliability Directive” should be all inclusive and include “all” actions initiated by the Reliability Coordinator, Transmission Operator or Balancing Authority (not just Emergency or Adverse Reliability Impacts). Even though Emergency or Adverse Reliability Impacts are defined, during operations, it may become a gray area to whether or not it falls under the intent of a “Reliability Directive.”</p> <p>The RCSDT appreciates your comment about including all actions initiated by the BA, RC and TOP; however, the RCSDT has determined that the development of the Reliability Directive concept improves reliability by placing a heightened awareness on actions that are required to avoid an Adverse Reliability Impact. Additionally, the industry does not support the proposed suggestion above based on previous postings and comments. No change made.</p> <p>Furthermore, if the system falls under a condition that results in an Adverse Reliability Impact, it may be too late for a Reliability Coordinator, Transmission Operator or Balancing Authority to issue a Reliability Directive. ReliabilityFirst recommends the following for revision to the term “Reliability Directive”:</p> <p><i>Reliability Directive - A communication initiated by a Reliability Coordinator, Transmission Operator or Balancing Authority where an action by the recipient is required.</i></p> <p>The RCSDT has determined that the development of the Reliability Directive concept as currently drafted, improves reliability by placing a heightened awareness on actions that are required to avoid an Adverse Reliability Impact. Additionally, the industry does not support the proposed suggestion above based on previous postings and comments. No change made.</p>
<p>Response: See response above.</p>		

Organization	Yes or No	Question 5 Comment
Midwest Independent Transmission System Operator	No	<p>The proposed definition of Reliability Directive is unacceptable because the use of the defined terms “Emergency” and “Adverse Reliability Impact” results in an undefined, broadened scope of responsibility for Reliability Coordinators when coupled with the definition of the Bulk Electric System. This may lead to confusion/ambiguity for Reliability Coordinators that must be clarified to ensure compliance. Further, this broadened scope may mis-direct Reliability Coordinator’s attention and mitigation efforts to small-scale, localized issues that represent no true threat to the operation of the Interconnection.</p>
<p>Response: The RCSDT thanks you for your comment; however, the RCSDT believes the definition actually narrows the responsibility by framing the condition(s) within which it is appropriate for anticipated actions necessary to address an Emergency or Adverse Reliability Impact. The IRO standards require the Reliability Coordinator to respond to issues regardless of the scale of issues. No change made.</p>		
Texas Reliability Entity	No	<p>We oppose the definition of Reliability Directive as it is currently being proposed in this standard because three-part communication should not be required only after an Emergency or Adverse Reliability Impact actually occurs.</p> <p>In particular, we object to the removal of the word “expected” (or “anticipated”) from the definition, because Reliability Directives may be required before a situation escalates to an Emergency, in order to prevent the Emergency from occurring. This proposed change potentially undermines efforts required to avoid emergencies and events.</p> <p>We note that there are instances in other Reliability Standards where “anticipated” conditions require actions to be taken (e.g. TOP-001-1 R5 and EOP-002 R4), when clear, concise, and definitive communication, verbal or electronic, is required to avoid or mitigate an impending emergency.</p>
<p>Response: The RCSDT notes that the term, “Adverse Reliability Impact,” is a currently defined NERC Glossary term; however, the term as it appears in the standard is the revised term, which is NERC Board of Trustee adopted and pending regulatory filing in IRO-014-2: “The impact of an event that results in Bulk Electric System instability or Cascading.” The pending definition covers the</p>		

Organization	Yes or No	Question 5 Comment
<p>application to potential instability and cascading conditions. The RCSDT included the phrase “to address” in the proposed definition of “Reliability Directive” to account for (1) potential and (2) actual events leading to an Emergency or Adverse Reliability Impact.” No change made.</p>		
<p>New York Independent System Operator</p>	<p>No</p>	<p>It is not clear the distinction between an Emergency and ARI. We would like to confirm that Since ARI is the impact of an event that results in instability or cascading, that an ARI is a subset of an emergency?</p> <p>Or said differently is an ARI simply instability or cascading? Ultimately, if ARI is a subset of Emergency, then why do we need both in the requirement?</p>
<p>Response: The RCSDT thanks you for your comment; however, the RCSDT believes the definition captures two independent conditions, anticipated and after or post event. The definition of Emergency implies situations where the event is anticipated or currently happening. Additionally, the term “Adverse Reliability Impact” is a currently defined NERC Glossary term; however, the term as it appears in the standard is the revised term, which is NERC Board of Trustee adopted and pending regulatory filing in IRO-014-2: “The impact of an event that results in Bulk Electric System instability or Cascading.” The pending definition covers the application to potential instability and cascading conditions. The RCSDT included the phrase “to address” in the proposed definition of “Reliability Directive” to account for (1) potential impacts of events and (2) actual events leading to an Emergency or Adverse Reliability Impact.” No change made.</p>		
<p>Oncor Electric Delivery</p>	<p>Affirmative</p>	<p>"Oncor requests clarity about what constitutes a “recipient.”</p> <p>For example, if a Transmission Grid Operator performing the functions of a Transmission Operator issues a Reliability Directive to its own field operations personnel to perform an action on behalf of the same entity, does the field operations personnel as the recipient become in affect a “Transmission Operator” subject to R2?"</p>
<p>Response: The term “recipient” in this case is referring to entity-to-entity communication and is inferred by Requirement R2 naming the entities. No change made.</p>		
<p>Constellation Energy</p>	<p>Affirmative</p>	<p>As we commented on Project 2007-03 TOP-001-2, the definition of Reliability</p>

Organization	Yes or No	Question 5 Comment
Commodities Group		<p>Directive is an improvement but the definition must capture the identification concept that is reflected in the Requirement (R1).</p> <p>As a result, when Reliability Directive is used elsewhere, it would be clear that the communication must be identified as a Reliability Directive.</p> <p>We suggest the following revision to the definition and it should follow through to Project 2006-06 IRO-001-3 and Project 2007-03 TOP-001-2, eventually being added to the Reliability Standards Glossary of Terms.</p> <p><i>“A communication identified as a Reliability Directive by a Reliability Coordinator, Transmission Operator, or Balancing Authority to initiate action by the recipient to address an Emergency or Adverse Reliability Impact.”</i></p>
<p>Response: The RCSDT thanks you for your comment; however, the suggested improvement is addressed in the requirement COM-002-3, R1 (see below). The definitions should avoid a structure that identifies an action or performance of an entity. The Standard Processes Manual (SPM), “Process for Developing a Defined Term”, Page 22 states in the first paragraph: “Definitions shall not contain statements of performance Requirements.” No change made.</p> <p>“R1. When a Reliability Coordinator, Transmission Operator or Balancing Authority requires actions to be executed as a Reliability Directive, the Reliability Coordinator, Transmission Operator or Balancing Authority shall identify the action as a Reliability Directive to the recipient. [Violation Risk Factor: High][Time Horizon: Real-Time]”</p>		
National Grid	Affirmative	<p>Delete reference to "adverse reliability impact" in R1. The "adverse reliability impact" definition is not clear, is this an actual event or contingency?</p> <p>The words imply it is an actual event which is already covered in the "Directive" definition. If the intent is to apply directives to potential stability or cascading contingencies it should say so.</p>
<p>Response: The RCSDT thanks you for your comment; however, the RCSDT believes the definition captures two independent conditions, anticipated and after or post event. The definition of Emergency implies situations where the event is anticipated or currently happening. Additionally, the term “Adverse Reliability Impact” is a currently defined NERC Glossary term; however, the term as it appears in the standard is the revised term, which is NERC Board of Trustee adopted and pending regulatory filing in IRO-</p>		

Organization	Yes or No	Question 5 Comment
<p>014-2: “The impact of an event that results in Bulk Electric System instability or Cascading.” The pending definition covers the application to potential instability and cascading conditions. The RCSDT included the phrase “to address” in the proposed definition of “Reliability Directive” to account for (1) potential and (2) actual events leading to an Emergency or Adverse Reliability Impact.” No change made.</p>		
Wisconsin Public Service Corp.	Affirmative	<p>The Standards Drafting Team has provided a great deal of clarity regarding Reliability Directives, however we believe BES reliability would be further enhanced if Reliability Directives were still required to be issued in a clear, concise, and definitive manner. Under Emergency conditions, we feel this would enhance communications effectiveness and expedite parties taking necessary actions quickly.</p>
<p>Response: The RCSDT believes the current form of the requirements accomplish this objective. If the issuer is not clear, concise and definitive, it would lead to the issuer having to repeat the process. It is incumbent and beneficial to the issuer to meet this performance without a specific requirement to instruct. Additionally, measuring clear, concise and definitive manner poses significant issues. No change made.</p>		
We Energies	Yes	<p>The definition is acceptable, but as used may imply that all Emergency communications must be Reliability Directives.</p>
<p>Response: The RCSDT thanks you for your comment; however, definitions should avoid a structure that identifies an action or performance of an entity. The Standard Processes Manual (SPM), “Process for Developing a Defined Term”, Page 22 states in the first paragraph: “Definitions shall not contain statements of performance Requirements.” No change made.</p>		
Ingleside Cogeneration LP	Yes	<p>Ingleside Cogeneration agrees that it is important to clearly denote when a directive must be issued. In previous definitions, we believed that imprecise language made it difficult for the BA, RC, or TOP to determine if a gray area situation required a directive or not. With a more precise definition, it will eliminate second guessing by auditors that a directive was necessary because an outcome turned out poorly - even if an Emergency was not declared or an Adverse Reliability Impact did not occur.</p>
<p>Response: Thank you for your comment.</p>		

Organization	Yes or No	Question 5 Comment
ERCOT ISO	Yes	The definition of Reliability Directive appropriately clarifies the importance of knowing the level of importance of any instructions being issued. If there is no room for variance from the specific action required, or if there is no time to further negotiate or discuss the action required, it is important that the instruction be identified as a Reliability Directive and for such instructions to be followed in a timely fashion. Normal operating instructions typically do not rise to this level of urgency and some variation from the words will not result in unmanageable reliability impacts. Also, there typically may be time for addressing the instructions in more than one way.
Response: Thank you for your comment.		
NIPSCO		The question of whether one is in a state of Emergency or Instability, or in an Abnormal Condition can be still be subjective; it may be difficult to provide evidence for an audit.
Response: The responsible entity determines “state of Emergency or instability” and acts accordingly. No change made.		
Pacific Northwest Generating Cooperative	Yes	
MRO NSRF	Yes	
City of Tacoma, Department of Public Utilities, Light Division, dba Tacoma Power	Yes	
LG&E and KU Services Company	Yes	
Bonneville Power	Yes	

Organization	Yes or No	Question 5 Comment
Administration		
SPP Standards Review Group	Yes	
Dominion	Yes	
Western Electricity Coordinating Council	Yes	
Southwest Power Pool Regional Entity	Yes	
FirstEnergy	Yes	
MISO Standards Collaborators	Yes	
Florida Municipal Power Agency	Yes	
Global Engineering and Energy Solutions	Yes	
ACES Power Marketing Standards Collaborators	Yes	
Kansas City Power & Light	Yes	
Salt River Project	Yes	
San Diego Gas & Electric	Yes	

Organization	Yes or No	Question 5 Comment
Central Lincoln	Yes	
Shell Energy North America	Yes	
Xcel Energy	Yes	
Independent Electricity System Operator	Yes	
Liberty Electric Power LLC	Yes	
Oncor Electric Delivery Company LLC	Yes	
Consolidated Edison Co. of NY, Inc.	Yes	
City of Jacksonville Beach dba/ Beaches Energy Services	Yes	
Luminant Energy Company LLC	Yes	
Pepco Holdings Inc.	Yes	
Exelon	Yes	
Manitoba Hydro	Yes	
Orange and Rockland Utilities, Inc.	Yes	

Organization	Yes or No	Question 5 Comment
South Carolina Electric and Gas	Yes	
Georgia Transmission Corporation	Yes	
Nebraska Public Power District	Yes	
Georgia System Operations	Yes	
ISO New England	Yes	
City of Vero Beach	Yes	
NV Energy	Yes	
Hydro One Networks Inc.	Yes	
American Transmission Company, LLC	Yes	
Indiana Municipal Power Agency		No comment.

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

Summary Consideration: This question yielded the most comments overall and many are duplicative of previous comments. For those duplicative comments, the RCSDT respectfully directs summary consideration of those comments to the above questions. Several commenters noted these standards are not “results-based” and this is mainly due to the project’s ongoing work. The standard(s), in a way, appear more results-based by not being prescriptive; however, the specific standards do not implement the results-based formatting. There were many comments about aligning the three standards to have the same implementation plan. The RCSDT agrees and aligned all three with the same implementation. Some comments questioned the need to have an authority requirement for the Reliability Coordinator in IRO-001-3, R1 because it appears to be granted under the ERO registration criteria. The ERO criteria does not provide for this authority. Additionally, IRO-001-3 does not limit the Reliability Coordinator’s authority to issuing only Reliability Directives. The Reliability Coordinator has the authority to direct, which could include Reliability Directives (a subset of direction or directing) is the theme carried out in each requirement. Some comments asked about direct, direction, and when an Emergency or Adverse Reliability Impact would be identified. The terms “direct” and “direction” are consistent with the intent of the standard in its authority and “identify” is upon recognition, which is a condition when the Reliability Coordinator would be acting or directing others to act. The requirements do not preclude the Reliability Coordinator from taking action for other situations, even if it is aware of situations beyond its area. A few comments concerned adding a time element to the requirements, such as, preventing events in Real-time; however, the assigned Time Horizons provide for this under Real-time Operations and Same Day Operations.

Comments noted a difference in “shall have” and “shall designate” within the requirements of COM-001-2. The intent of allowing an entity to “designate” allows the entity to designate the Alternative Interpersonal Communication capability providing greater flexibility in meeting the requirement. Additionally, there were comments about testing the Interpersonal Communication capability in addition to the Alternative Interpersonal Communication capability. The RCSDT intentionally omitted testing the Interpersonal Communication capability because routine use is sufficient to demonstrate functionality. The standard COM-001-2 measures have been updated to appropriately reflect the specific requirements and make the evidence examples clearer. There were several concerns about the designating a replacement Alternative Interpersonal Communication capability within two hours. The RCSDT notes the performance is to designate a replacement, not to accomplish the repairs. The reliability need is to designate what the Alternative Interpersonal Communication capability will be, should it be called upon. Commenters raised concerns about most of the VSLs in COM-001-2 being Severe. These VSLs are Severe because there are essential to reliability. By the construction of the requirement, VSLs are binary, which requires the VSLs to be Severe according to NERC VSL Guidelines. Some comments questioned the removal of requirement, R4. This requirement remains enforce until the approval of COM-003-1 under Project 2007-02.

Several commenters noted that COM-002-3 seems to be requiring the “how” to accomplish the communication coordination. The RCSDT emphasizes the requirements state the “what,” rather than “how.” In a basic sense, the “what” is highlighted by R1 by

identifying the communication as a Reliability Directive, next in R2 the recipient responds accordingly, and R3 the issuer confirms the communication. How the process is accomplished is up to the entity.

Some commenters were concerned about the measures and evidence. The measures are examples, and the entity is not limited to the examples provided; including letters of attestation, where appropriate. The RCSDT addressed other document errors, formatting issues, referencing, and mismatch issues raised in the comments. The Effective Date, Compliance, and Data Retention sections have been updated to the most current language used in standards through the standard review process.

Organization	Yes or No	Question 6 Comment
Alberta Electric System Operator	Abstain	IRO-001-3: The Alberta version of IRO-001 will outline limitations to the authority of the RC, that are required by Alberta legislation.
<p>Response: The standard drafting team (SDT) has drafted requirements to address the purpose of the standard, repeated here: To establish the authority of Reliability Coordinators to direct other entities to prevent an Emergency or Adverse Reliability Impacts to the Bulk Electric System. The requirements have been drafted within the context established by the NERC Functional Model V5, and describes interrelationships of the functional entities in accordance with the Functional Model V5. Please address any variations from this structure, which may be required by Alberta legislation, with NERC as the ERO. No change made.</p>		
City Utilities of Springfield, Missouri	Affirmative	City Utilities of Springfield, Missouri supports comments submitted by SPP.
<p>Response: Thank you for your comment.</p>		
United Illuminating Co.	Affirmative	COM-001-2: UI votes Affirmative with the comment that R1 through R9 are requirements in the Planning Horizon not the Real Time Operations horizon. These requirements are scoped to the establishment of communication processes with other entities not with actions taken by operations.
<p>Response: The RCSDT recognizes that, in most instances, the establishment of communications capability and the designation of Alternative Interpersonal Communications capability will have taken place at some time in the past (which could be the operations planning horizon for the present Real-time instance). However, the full reason for such action is to be sure that the communications capability is in place and functional during the Real-time Operations horizon for use in Real-time operating actions. Therefore, the</p>		

Organization	Yes or No	Question 6 Comment
<p>RCSDT has established the applicable time horizon to be the Real-Time Operations horizon. No change made.</p>		
<p>SERC Reliability Corporation</p>	<p>Affirmative</p>	<p>COM-002-3 Comments</p> <p>R2: We recommend that the following phrase (in quotes) be added to R2: Each Balancing Authority, Transmission Operator and Distribution Provider that is the recipient of a Reliability Directive shall repeat, restate, rephrase or recapitulate the Reliability Directive "immediately upon receiving it."</p> <p>As written, there is no limit as to when the entity must repeat it (i.e. they could wait 2 hours) The Standard is not clear as to what each entity is to do when more than one entity receives a Reliability Directive at the same time (e.g. during a RC area teleconference call).</p> <p>For example, is a roll call of receiving entities expected to be held so that they individually can repeat, restate, rephrase or recapitulate the Reliability Directive followed by individual confirmation required in R3?</p>
<p>Response: The requirement aims at being a performance-based requirement, and states a description of “what” communication must take place, but does not prescribe “how” the communication is to be made. Adding the suggested phrase “immediately upon receiving it” introduces the ambiguous term “immediately,” for which there is neither plain meaning nor simple explanation. What must happen is that the recipient must respond in such a way that the issuer may determine whether the message has been properly understood. The RCSDT concludes that the proposed language gives plain meaning. No change made.</p> <p>The question about whether a roll call of receiving entities is expected to be held is asking for prescription of “how” to accomplish what is required. The RCSDT recognizes that there is more than one way to accomplish the confirmation when more than one entity received a Reliability Directive at the same time. What is required is for the recipient to respond in such a way that the issuer may determine whether the message has been properly understood. One way for that to occur would be, as you suggest, for the entities to individually respond. Another way would be for a pre-established protocol or procedure (e.g., roll-call, all-call, etc.) to be in place and used in such cases. The RCSDT has determined that prescribing “how” to ensure that “what” is required has been accomplished is not required and that the individually adopted procedures or protocols could offer many different ways to ensure effectiveness. No change made. The RCSDT concept is that “All Call” compliance is related to having a document that explains how the entity responds. No change made.</p>		

Organization	Yes or No	Question 6 Comment
Alliant Energy Corp. Services, Inc.	Affirmative	COM-002-3: Alliant Energy recommends that the Effective Date be the first day of the second calendar quarter after applicable regulatory approval, to be the same as COM-001-2 and IRO-001-3. In that way all 3 standards would be effective at the same time, making implementation much smoother.
<p>Response: Thank you for your comment. The RCSDT will adjust the standards to have the same implementation date.</p>		
Wisconsin Electric Power Co.	Affirmative	<p>COM-002-3: Since all the Requirements are related to Reliability Directives, is it implied that all “Emergency Communications” are Reliability Directives even if not designated as such per R1?</p> <p>-The M2 measure could be difficult for a recipient such as a Distribution Provider or Generator Operator. A recipient’s phone may not be recorded but an initiator’s always should. If a receiver refused to meet the R2 requirement, an initiator should have an alternative (i.e., repeat the directive and provide potential penalties if recipient refuses to comply).</p> <p>Should the initiator have responsibility for providing the entire 3-way evidence as M3 implies?</p>
<p>Response: The RCSDT would like to highlight that communications is not a defined term in the NERC Glossary of Terms used in Reliability Standards, nor is it defined in this standard. Thus, the plain meaning of communications is intended. The RCSDT has not implied a defined term in the wording of the purpose statement of the standard, nor in the requirements themselves, that any communication is a Reliability Directive unless the issuing functional entity identifies the actions to be taken as a Reliability Directive. Therefore, not all communications during Emergencies will be Reliability Directives. No change made.</p> <p>COM-002, R2: The RCSDT included some examples of how to provide the evidence needed for Measure M2. The examples are not intended to be an all-inclusive list. The RCSDT does point out, though, that dated operator logs could provide such evidence. The RCSDT does not believe that the recipient has the alternative to refuse to perform, as required. However, the RCSDT does bring attention to standard IRO-001-3, which requires entities to comply with directions unless compliance with the direction cannot be physically implemented or unless such actions would violate safety, equipment, regulatory, or statutory requirements. No change made.</p>		

Organization	Yes or No	Question 6 Comment
<p>COM-002 M3: The Measure is correct as written. The issuer only needs the evidence that it confirmed the response was accurate or reissued according to the requirement. Evidence does not necessarily mean the entity must have the entire three-way conversation captured (i.e., recording), but evidence the entity confirmed or reissued according to requirement. No change made.</p>		
<p>Wisconsin Electric Power Marketing</p>	<p>Affirmative</p>	<p>COM-002-3: Since all the Requirements are related to Reliability Directives, is it implied that all “Emergency Communications” are Reliability Directives even if not designated as such per R1.</p> <p>The M2 measure could be difficult for a recipient such as a Distribution Provider or Generator Operator. A recipient’s phone may not be recorded but an initiator’s always should. If a receiver refused to meet the R2 requirement, an initiator should have an alternative. i.e., repeat the directive and provide potential penalties if recipient refuses to comply. Should the initiator have responsibility for providing the entire 3-way evidence as M3 implies?</p>
<p>Response: The RCSDT would like to highlight that communications is not a defined term in the Glossary of Terms used in NERC Reliability Standards, nor is it defined in this standard. Thus, the plain meaning of communications is intended. The RCSDT has not implied in the wording of the purpose statement of the standard, nor in the Requirements statements themselves, that any communication is a Reliability Directive unless the issuing functional entity identifies the actions to be taken as a Reliability Directive. No change made.</p> <p>COM-002, R2: The RCSDT included some examples of how to provide the evidence needed for measure M2. The examples are not intended to be an all-inclusive list. The RCSDT does point out, though, that dated operator logs could provide the evidence. The RCSDT does not believe that the recipient has the alternative to refuse to perform as required. No change made.</p> <p>COM-002 M3: The Measure is correct as written. The issuer only needs the evidence that it confirmed the response was accurate or reissued according to the requirement. Evidence does not necessarily mean the entity must have the entire three-way conversation captured (i.e., recording), but evidence the entity confirmed or reissued according to requirement. No change made.</p>		
<p>Southwest Transmission Cooperative, Inc.</p>	<p>Affirmative</p>	<p>COM-002-3: While COM-002-3 is well written to explain the three-part communications requirements and makes it perfectly clear when a Reliability Directive has been issued, the opening clause leaves the responsible entity open to second guessing on whether they should have issued a Reliability Directive. This</p>

Organization	Yes or No	Question 6 Comment
		<p>problem could be solved by changing the opening clause to “When a Reliability Coordinator, Transmission Operator, or Balancing Authority determines actions need to be executed as a Reliability Directive.”</p> <p>In the second bullet of Requirement R3, we suggest using “Restate” in place of “Reissue.” The responsible entity is not really reissuing the Reliability Directive. They are still in the act of trying to get the Reliability Directive issued and are simply re-communicating it because it was not understood.</p>
<p>Response: The RCSDT believes the offered suggestion does not improve COM-002-3, R1. No change made.</p> <p>COM-002-3, R3: The communications described are not intended to be a once-through process. Effective communications, sometimes referred to as three-part or three-way, often may be effective only after numerous iterations. The RCSDT believes the likely first effort to clarify would be to re-issue the instructions just to determine whether the recipient simply “heard wrong.” Using the word re-state seems to imply that the wording is incorrect in some way or for some other reason needs to be said a different way. The RCSDT believes it is more likely that the issuer is attempting to bet the recipient to understand and therefore believes that reissue is more appropriate. No change made.</p>		
Public Utility District No. 1 of Okanogan County	Affirmative	IRO-001-3: Need to correct language in Data Retention section 1.3. references R3 R4 and M3 and M4. There is no R4 and M4.
<p>Response: The RCSDT agrees and thanks you for your comment. The language has been changed to eliminate R4 and M4 references.</p>		
Sierra Pacific Power Co.	Affirmative	<p>IRO-001-3: R1 appears to be unnecessary due to the authority that is already inherent through the functional model.⁸</p> <p>Further, the measure for R1 does not properly cover the requirement that the RC "have authority"; rather, it measures whether the RC exercised that authority.</p>

⁸ NERC Functional Model Version 5, (http://www.nerc.com/files/Functional_Model_V5_Final_2009Dec1.pdf)

Organization	Yes or No	Question 6 Comment
<p>Response: The RCSDT agrees that the standard requirements language is consistent with the authority that is inherent in the Functional Model V5. However, the Functional Model V5 does not constitute enforceable requirements for entities to follow. Such requirements are established within the Reliability Standards. The Functional Model V5 provides good guidance for a consistent structure throughout the Reliability Standards. In addition, the Reliability Coordinator’s reliability certification is established through Regional Entities and the authority to act is measured. No change made.</p>		
<p>Platte River Power Authority; Portland General Electric Co.;; U.S. Army Corps of Engineers</p>	<p>Affirmative</p>	<p>IRO-001-3: Requirement R1 of IRO-001-3, requiring the Reliability Coordinator to have the authority to act or direct actions, appears to be unnecessary because it seems that this authority is granted when the entity is certified as the Reliability Coordinator.</p> <p>Additionally, the associated Measure M1, as worded, does not provide evidence that the Reliability Coordinator has the authority to act or direct other to act, but rather provides evidence that the Reliability Coordinator acted or took action to direct others.</p>
<p>Response: IRO-001-3, R1: The RCSDT agrees that the requirement is consistent with intended functions of a Reliability Coordinator when the entity is recognized as a Reliability Coordinator. The RCSDT has been informed by the ERO that registration criteria do not provide for certification of this authority In addition, the Reliability Coordinator’s reliability certification is established through Regional Entities and the authority to act is measured. No change made.</p>		
<p>National Grid</p>	<p>Negative</p>	<p>- Requiring RCs, TOPs and BAs to state an action as a "reliability directive" complicates communications during a time when response time and clarity are important. If those issuing a directive don't get a repeat back they just need to ask for one. The requirement just needs to define "what" is required not "how." This can be handled by procedures and training.</p> <p>COM-002-3, R1: The requirement states “what” must be done: the action(s) are to be identified as a Reliability Directive. The requirement does not establish “how” the action is to be done. The RCSDT agrees that, under conditions such as you describe, time may be of the essence. Much as in military operations, discussion time is over and action is required when the recipient understands an order has been given.</p>

Organization	Yes or No	Question 6 Comment
		<p>Discussion of disagreement or alternatives may occur later, if and as needed, but no more time can be consumed discussing the directions given. The RCSDT has not prescribed “how” these things must be done, and the RCSDT recognizes there is more than one way. The RCSDT has determined it is appropriate to place the responsibility on the recipient to give a response. The RCSDT agrees that the issuer may ask for a response if one has not been given, but the responsible entity to perform the action is the recipient. The RCSDT agrees that procedures and training are good practices appropriate for this process, but the standard requirements establish what must be done, not how personnel are prepared to do it. No change made.</p> <p>- Delete reference to "adverse reliability impact" from the "Directive" definition. The "adverse reliability impact" definition is not clear, is this an actual event or contingency?</p> <p>The words imply it is an actual event which is already covered in the "Directive" definition. If the intent is to apply directives to potential stability or cascading contingencies it should say so.</p> <p>The RCSDT notes that the term, “Adverse Reliability Impact” is a currently defined NERC Glossary term; however, the term as it appears in the standard is the revised term, which is NERC Board of Trustee adopted and pending regulatory filing in IRO-014-2: “The impact of an event that results in Bulk Electric System instability or Cascading.” The pending definition covers the application to potential instability and cascading conditions. The RCSDT included the phrase “to address” in the proposed definition of “Reliability Directive” to account for (1) potential and (2) actual events leading to an Emergency or Adverse Reliability Impact.” No change made.</p>
<p>Response: See response above.</p>		
SERC Reliability Corporation	Negative	COM-001-2 Comments Definition of Alternative Interpersonal Communication: The proposed definition uses the term "medium."

Organization	Yes or No	Question 6 Comment
		<p>What is the scope of that? Telephony is a "medium", but there is wired, wireless, satellite, etc.</p> <p>Was "medium", intended to differentiate voice, paper, text, email, teletype, or something else? Does the qualifying term "same", when modifying infrastructure mean something like voice versus written?</p> <p>What about situations where the primary telephone system is Voice Over Internet Protocol (VOIP) and it is using the same computer network infrastructure as an email or messaging system. That is the "same infrastructure" but a different "medium."</p> <p>The RCSDT believes that prescribing a device or medium would limit an entity. Please refer to the definition of Interpersonal Communication and Alternative Interpersonal Communication. Medium: the plain meaning of the word medium in noun form is a vehicle for ideas, a means of conveying ideas or information. The RCSDT recognizes there are many differing technologies for accomplishing communications and it is not necessary to prescribe which to use. A common medium is telephony, and the commenter is correct that there are different technological forms of telephony. What is required is that there be a medium in place so that Interpersonal Communication capability exists. No change made.</p> <p>R1 and R2 - We suggest the drafting team look at Standard EOP-008, Requirements R3 and R8 and add appropriate language in Standard COM-001-2, to avoid instantaneous non-compliance for loss of Interpersonal Communications and/or Alternate Interpersonal Communications.</p> <p>The RCSDT reviewed both EOP-008-0 and EOP-008-1, which is subject to future enforcement. In either version, the team believes there is no need to add additional language to the standard. This was not intended by the drafting team. The intent is to give the entity the flexibility in meeting the requirement. A loss of Interpersonal Communication capability is covered by R10, notification of Interpersonal Communication capability failure. No change made.</p> <p>R1 - In later requirements it is proposed that the entity "shall designate an." It is</p>

Organization	Yes or No	Question 6 Comment
		<p>suggested that for consistency and audit ability, this concept be used for R1, R3, R5, R7 and R8.</p> <p>The RCSDT believes the requirements achieve the desired intent of the standard. Each entity listed must “have” an Interpersonal Communication capability and for Alternative Interpersonal Communication capability able to “designate” the alternate. The team established these requirements to provide flexibility to the industry. No change made.</p> <p>In addition, the qualifier of "primary" should be used such that the requirements read:</p> <p><i>"shall have designated, primary Interpersonal Communications capability with the following entities:"</i></p> <p>Although it is appropriate that "Alternative" be capitalized since it is used in a defined term (i.e. Alternative Interpersonal Communication) that bounds acceptable alternative methods , we do not see the need to capital "primary."</p> <p>The term “Interpersonal Communication” is a defined term in this standard. As such, it has a different meaning than “Alternative Interpersonal Communication,” thus there should be no confusing of the two. In addition, the word “primary” purposely does not exist in the requirements since the RCSDT did not intend to create a requirement for redundancy. Redundancy continues to be a good practice, but it is not required by this standard. Only that some entities must have both an Interpersonal Communication capability and a designated Alternative Interpersonal Communication capability. No change made.</p> <p>R9 - The requirement is unclear if the required monthly test is a general functionality test or if there is the expectation of testing the designated Alternative Interpersonal Communications with all of the entities defined in the sub-requirements of R2, R4, and R6. There is no expectation of testing the primary Interpersonal Communications - is this intentional or an oversight?</p> <p>Although functional testing of this should be done as a normal course of business,</p>

Organization	Yes or No	Question 6 Comment
		<p>should an explicit test be required with each entity in the sub-requirements of R1, R3, R5, R7 and R8 to insure, for example, that all the phone numbers are correct?</p> <p>The RCSDT intends each Alternative Interpersonal Communication capability to be verified functional by testing. If an entity has only one such capability, then only one test would be required. You further ask whether the absence of required testing of the “primary” (word is not in the requirement) Interpersonal Communication capability is intentional. The RCSDT intentionally left it out because the communications capability is used routinely and the use is sufficient to demonstrate functionality. With respect to phone numbers, these are procedural matters to be addressed by each individual entity and by including phone numbers it would make the requirement prescriptive. The requirement is to test capability. No change made.</p> <p>R10 - The following scenario seems plausible: The Interpersonal Communications fails and is detected at 14:00 and gets fixed at 14:35. It lasted more than 30 minutes but is fixed. As written the requirement would require the responsible entity to notify entities identified in R1 through R6 by 15:00 (i.e. 60 minutes from detection) even though the problem no longer exists. Is that the expectation?</p> <p>Does COM-001 apply only to primary control centers or back-ups, per EOP-008, as well?</p> <p>Yes, the entity experiencing the failure is required by R10 to notify the entities as identified within the 60-minute time frame. The RCSDT believes these situations would be few in numbers and not overly burdensome to perform. No change made.</p> <p>The RCSDT reviewed both EOP-008-0 and EOP-008-1, which is subject to future enforcement. In either version, the team believes there is no need to add additional language to the standard. No change made.</p> <p>M9 reads “at least on a monthly basis.” We suggest that this be changed to “at least once per calendar month” as written in R9. This change should also be corrected in the VSLs.</p>

Organization	Yes or No	Question 6 Comment
		<p>The RCSDT agrees and has changed the language in COM-001-2, M9 to agree with the language in R9.</p> <p>M8 - We suggest removing the second “that” in the first sentence of the measure.</p> <p>COM-001-2, M8: The RCSDT agrees and the language in M8 has been changed to delete the additional “that”.</p> <p>M10 - We suggest this be revised to coincide with changes made in R10 (deleting impacted and adding as identified in Requirements R1 through R6), therefore M10 should read:</p> <p><i>“Each Reliability Coordinator, Transmission Operator, and Balancing Authority, shall have and provide upon request evidence that it notified entities as identified in Requirements R1 through R6 within 60 minutes of the detection of a failure of its Interpersonal Communications capabilities that lasted 30 minutes or longer. Evidence could include, but is not limited to dated operator logs, dated voice recordings or dated transcripts of voice recordings, electronic communications, or equivalent evidence. (R10.)”</i></p> <p>The RCSDT agrees and has changed the language in COM-001-2, M10 to include language consistent with the language in R10.</p> <p>M12 needs to be removed.</p> <p>COM-001-2, M12: The RCSDT agrees that the heading “M12” has no corresponding requirement and was overlooked in format clean-up. The “M12” heading has been removed.</p> <p>We question why the first paragraph of Section 1.3” Data Retention has been included in each of these three standards. We suggest that it should be removed from each standard.</p> <p>The RCSDT thanks you for your comments. The Data Retention language has been updated to be consistent with the Standards Drafting Guidelines.</p>

Organization	Yes or No	Question 6 Comment
Response: See response above.		
Independent Electricity System Operator	Negative	<p>COM-001-2:</p> <p>1. R1.2 and R2.2: The phrase “within the same Interconnection” is improper; it needs to be removed. RCs between two Interconnections still need to communicate with each other for reliability coordination (e.g. between Quebec and the other RCs in the NPCC region to curtail interchange transactions crossing Interconnection boundary). The SDT’s response that the phrase was added to address the ERCOT situation and citing that ERCOT does not need to communicate with other RCs leaves a reliability gap.</p> <p>Requirement R1 addresses a reliability need for adjacent Reliability Coordinators synchronously connected within the same Interconnection to have Interpersonal Communication capability; however, it does not preclude or limit the Reliability Coordinator from establishing Interpersonal Communication capability with others. The RCSDT does not see where there is a need to communicate with other Reliability Coordinator’s from one interconnection to another. No change made.</p> <p>2. R3.5 and R4.3: The phrase “synchronously connected within the same Interconnection” is also improper; it needs to be removed. TOPs do communicate with other TOPs including those asynchronously connected and in another Interconnection (e.g. between Quebec and all of its asynchronously interconnected neighbors).</p> <p>The RCSDT has made clarifying changes by adding a Part to R3 and R4 to address asynchronous connections between Transmission Operators and have eliminated the phrase “within the same interconnection.”</p> <p>3. R4 and R6: not requiring an Alternative Interpersonal Communication capability between the BAs and the DP and GOP can result in a reliability gap. If Interpersonal Communication capability between the BAs and these entities is required to begin with to enable BAs to communicate with these entities (such as operating</p>

Organization	Yes or No	Question 6 Comment
		<p>instructions or Reliability Directives) to ensure reliable operations, then an alternative capability is also needed to ensure this objective is achieved when the primary capability fails.</p> <p>The RCSDT refers the Order No. 693 in Paragraph 508 to clarify the reason the DP and GOP are not required to have Alternative Interpersonal Communication and is as follows: “(1) expands the applicability to include Generator Operators and Distribution Providers and includes Requirements for their telecommunications facilities; (2) identifies specific requirements for telecommunications facilities for use in normal and emergency conditions that reflect the roles of the applicable entities and their impact on Reliable Operation and (3) includes adequate flexibility for compliance with the Reliability Standard, adoption of new technologies and cost-effective solutions.” In addition, R11 requires the DP and GOP to consult with its BA and TOP to determine a mutually agreeable action for restoration. No change made.</p> <p>4. Measure M3 does not cover the added R3.5 condition (having Interpersonal Communications capability with each adjacent TOP). M3 needs to be revised.</p> <p>The RCSDT thanks you for your comment and has made conforming changes to make to COM-001-2, M3.</p>
<p>Response: See response above.</p>		
<p>Wisconsin Electric Power Marketing; Wisconsin Electric Power Co.</p>	<p>Negative</p>	<p>COM-001-2: Although a great improvement over existing COM-001, and eliminates the data component see comments:</p> <ul style="list-style-type: none"> -For R5.1 Can the solutions included to meet R1 be included, same R3.2 and R5.2, same R5.3 and R7.2, same R5.4 and R8.1. -For R5.2 Can the solutions included to meet R2 be included, same R4.2 and R6.2. <p>COM-001-2, R5: In a word: Yes. The requirement is to have capability, and that capability does not have to be different from what the entity on the other end has. No change made.</p>

Organization	Yes or No	Question 6 Comment
		<p>-R9 a 2 hour response for a once a month test seems extreme, as would require a secondary Alternate Interpersonal Communications capability.</p> <p>-M9 is reasonable, but should include something about communication actual repair and or time estimates.</p> <p>COM-001-2, R9: The requirement is to “initiate action to repair or designate a replacement Alternative Interpersonal Communication capability...” within two hours. The RCSDT recognizes that many different contracts or other arrangements may exist to address repair. However, the RCSDT finds that entities should know what they have and how to initiate repair and those two hours to do so is reasonable. No change made.</p> <p>COM-001-2, M9: The requirement is to have evidence that either repair was initiated or an Alternative Interpersonal Communication capability was designated within two hours. The RCSDT understands that, in extreme cases, the entity may need to make its initial Alternative Interpersonal Communication capability its Interpersonal Communication capability and then designate another Alternative Interpersonal Communication capability, if the repair times are so long that to continue in that mode for that long would present a reliability risk. Such arrangements, if they exist at all, are very rare. No change made.</p> <p>-R10 The use of R1 through R6 implies notification of both Interpersonal Communications and Alternate Interpersonal Communications failures. Do you notify if you become aware after the link is back up if it was down for GT 30 minutes, and doesn’t address notifying when restored?</p> <p>COM-001-2, R10: The RCSDT thanks you for pointing this out. The RCSDT has modified the language of R10 to refer to R1, R3, and R5, rather than “R1 through R6” since the responsible entities are limited to the RC, the TOP, and the BA in these requirements.</p> <p>Yes, there is no requirement to notify identified entities the Interpersonal Communication have been restored. No change made.</p>

Organization	Yes or No	Question 6 Comment
		<p>-R11 Implies that R8 and R9 are independent and redundant to R5.3, R5.4 and R3.3 and R3.4.</p> <p>Update M9 accordingly.</p> <p>COM-001-2, R11: The RCSDT believes you intended to refer to R7 and R8, rather than R8 and R9. The RCSDT does not believe that the language implies that the communications capability required by R7 and R8 are independent, but they may be. If the entity which is registered as a DP is also registered as a GOP, although unlikely, then the capability could be met by the same medium. Neither does the RCSDT believe that R11 implies that R7 and R8 are redundant to R3.3 and R3.4 or to R5.3 and R5.4. No change made.</p>
<p>Response: See response above.</p>		
Tampa Electric Co.	Negative	<p>COM-001-2:</p> <p>By use of the term “any” in the phrase “a failure of any of its Interpersonal Communication” the standard will actually create a disincentive for redundant communications with DPs and GOPs due to compliance risk. It needs to be limited to primary Interpersonal Communications with its TOP and/or BA.</p>
<p>Response: The RCSDT appreciates your comment and has made clarifying changes by removing the phrase “any of” in COM-001, R11. Additionally, the RCSDT made a clarifying change to indicate the DP and GOP only need to consult with the entity affected by the failure.</p> <p>The term “Interpersonal Communication” is a defined term in this standard. As such, it has a different meaning than “Alternative Interpersonal Communication,” thus there should be no confusing of the two. In addition, the word “primary” purposely does not exist in the requirements since the RCSDT did not intend to create a requirement for redundancy. Redundancy continues to be a good practice, but it is not required by this standard. Only that some entities must have both an Interpersonal Communication capability and a designated Alternative Interpersonal Communication capability. No change made.</p>		
Cogentrix Energy, Inc.	Negative	<p>COM-001-2:</p>

Organization	Yes or No	Question 6 Comment
		<p>Definition of Alternative Interpersonal Communication: The proposed definition uses the term “medium.”</p> <p>What is the scope of that? Telephony is a “medium” but there is wired, wireless, satellite, etc. Was “medium” intended to differentiate voice, paper, text, email, teletype, or something else?</p> <p>Does the qualifying term “same” when modifying infrastructure mean something like voice versus written?</p> <p>What about situations where the primary telephone system is Voice Over Internet Protocol (VOIP) and it is using the same computer network infrastructure as an email or messaging system.</p> <p>That is the “same infrastructure” but a different “medium” R8 Revision:</p> <p>GOP cannot dictate to the BA or TOP what types of Interpersonal Communication will be used, but they can work with them to establish a common tool.</p> <p>COM-001-2, “Medium”: the plain meaning of the word medium in noun form is a vehicle for ideas, a means of conveying ideas or information. The RCSDT recognizes there are many differing technologies for accomplishing communications, and it is not necessary to prescribe which to use. A common medium is telephony, and the commenter is correct that there are different technological forms of telephony. What is required is that there be a medium in place so that Interpersonal Communication capability exists. Your comment poses compliance questions but does not suggest changes. No change made.</p> <p>COM-001-2, Definition of Alternative Interpersonal Communication: You ask whether the use of the word “same” as a modifier of infrastructure mean something like voice versus written? It could, but is not required to. The RCSDT intends the language to indicate that whatever causes the loss of the Interpersonal Communication capability should not be a common cause of failure of the Alternative Interpersonal Communication capability. Thus, one telephone number could serve as the Interpersonal Communication capability and another telephone</p>

Organization	Yes or No	Question 6 Comment
		<p>number could serve as the Alternative Interpersonal Communication capability, as long as whatever causes the failure of the Interpersonal Communication capability does not automatically cause the failure of the Alternative Interpersonal Communication capability. No change made.</p> <p>R8 Balloting:</p> <p>R8. Each Generator Operator shall have Interpersonal Communications capability with the following entities:</p> <p>R8.1 Balancing Authority</p> <p>R8.2 Transmission Operator</p> <p>R8 Suggestion:</p> <p><i>R8. Each Generator Operator shall coordinate with the BA and TOP to establish Interpersonal Communications capability as requested by the BA and TOP.</i></p> <p>The standard establishes requirement for communication capability appropriate to ensure reliability. There is no requirement for it to be different from the Interpersonal Communication capability that its Balancing Authority has with it, nor the Interpersonal Communication capability that its Transmission Operator has with it. Cooperation and coordination is always encouraged and is an excellent practice, but is not required by this standard. Thank you for your suggestion. No change made.</p>
<p>Response: See response above.</p>		
Oncor Electric Delivery	Negative	<p>COM-001-2:</p> <p>Oncor takes the position that contacting all impacted entities within 60 minutes of the detection of a failure of its Interpersonal Communications capabilities that lasts 30 minutes or longer as prescribed in R1 through R6 is not doable within the ERCOT interconnect for a Transmission Operator.</p>

Organization	Yes or No	Question 6 Comment
		<p>The standard establishes requirement for Interpersonal Communication capability between entities for reliability purposes. The RCSDT recognizes that there are many different organizational arrangements and structures within the North American continent. The standard establishes “what” is required, but does not prescribe “how” it must be done. No change made.</p> <p>Oncor takes the position that notification to the RC and BA only is sufficient and that those two entities have the operational functionality to contact within the prescribed time all affected Distribution Providers, Generator Operators, and other Transmission Operators.</p> <p>Oncor also takes the position adding the word “impacted” to R10 will clarify that notification needs to be made only to the entities that are affected by the failure of a communication path.</p> <p>This will also more align with the language in M10."</p> <p>Thank you for your suggestion. The word “impacted” was removed in previous postings. For further clarification, the RCSDT has modified M10 to remove the word “impacted” to be consistent with R10. For additional clarity, the RCSDT also changed the phrase in R10 and M10, “R1 through R6” to “R1, R3, and R5,” to clarify that it applies to the capabilities with the RC, the TOP, and the BA.</p>
<p>Response: See response above.</p>		
National Grid	Negative	<p>COM-001-2:</p> <p>Overly prescriptive, not results-based. R7 & R8 are not necessary. Every entity at a minimum has a contact with a phone as their "Interpersonal Communications capability." Just need to require that every entity has a plan if they lose their primary communication channel ("Interpersonal Communications capability").</p>
<p>Response: The standard establishes requirement for communication capability appropriate to ensure reliability. In addition, R7 and R8 are responsive to FERC Order No. 693. Entities may use the telephone cited in the example as their Interpersonal Communication</p>		

Organization	Yes or No	Question 6 Comment
<p>capability. Requirement R11 as modified addresses the loss of Interpersonal Communication capability. No change made.</p>		
<p>Lincoln Electric System</p>	<p>Negative</p>	<p>COM-001-2: Please clarify whether R10 is intended to address both Interpersonal and Alternative Interpersonal Communications or only Interpersonal Communication.</p> <p>Although R10 identifies only Interpersonal Communication within the requirement, the reference to Requirements R1-R6 appears to include Alternative Interpersonal Communication as well. LES is concerned that if an entity's Interpersonal Communication is fully functional but discovers a failure in its Alternative Interpersonal Communication, the entity would still be required to notify entities per R10.</p>
<p>Response: The RCSDT thanks you for pointing this out. The RCSDT has modified the language of R10 to refer to R1, R3, and R5, rather than "R1 through R6," since the responsible entities are limited to the RC, the TOP, and the BA in these requirements.</p>		
<p>ISO New England, Inc.</p>	<p>Negative</p>	<p>COM-001-2: Please see comments submitted with the project... ISO-NE does not believe COM-001, in its entirety, is a results-based standards and therefore does not support the draft as written. We believe such "requirements" (i.e. capabilities) should be verified through an entity certification process.</p> <p>Additionally, results-based requirements should be the driver to have the capability to achieve them; on other words, there is no other way to reliably dispatch than to have communications facilities (electronic or voice).</p>
<p>Response: Although this is not a results-based standard, the RCSDT believes it is a significant improvement over the current COM-001 standard. The RCSDT will forward your comment to NERC staff for consideration.</p>		
<p>Commonwealth of Massachusetts Department of Public Utilities</p>	<p>Negative</p>	<p>COM-001-2: Primary concern here is with the phrase "within the same interconnection" which appears in R1.2 and R2.2. This removes any standard requirement for adjacent RCs that may not be in the same interconnection from communicating with each other. This constitutes a "gap" in reliability and is a</p>

Organization	Yes or No	Question 6 Comment
		concern.
<p>Response: Requirement R1 addresses a reliability need for adjacent Reliability Coordinators synchronously connected within the same Interconnection to have Interpersonal Communication capability; however, it does not preclude or limit the Reliability Coordinator from establishing Interpersonal Communication capability with others. The RCSDT does not see where there is a need to communicate with other Reliability Coordinator’s from one interconnection to another. No change made.</p>		
Detroit Edison Company	Negative	<p>COM-001-2:</p> <p>R9. I believe 2 hours is too short, suggest "within 24 hours."</p> <p>COM-001-2, R9: The requirement is to initiate repair or designate an Alternative Interpersonal Communication capability within two hours. The requirement is NOT to have the repair completed within two hours. The requirement recognizes that the entity may use its Alternative Interpersonal Communication capability now as its Interpersonal Communication capability, and then, if it decides to do so, designate another, if you may, “new” Alternative Interpersonal Communication capability. This is not required, but is an option that the entity can consider. The entity may already have a maintenance and repair agreement in place that will respond and repair the failed capability. No change made.</p> <p>R11. "mutually agreeable time" creates issues. What if TO and BA have differing time frames?</p> <p>Which entity bears the violation if agreement cannot be reached?</p> <p>Alexander Eizans</p> <p>COM-001-2, R11, For, “mutually agreeable time,” the “what” is required is to consult and determine a mutually agreeable time and the “How” that is to be done is too prescriptive to be included within a standard because of the great number of possible scenarios, organizational arrangement, and sizes of entities involved. No change made.</p> <p>I am concerned with the evidence listed under the measures (see M6, M7 and M8).</p>

Organization	Yes or No	Question 6 Comment
		<p>Dated equipment specifications and installation documentation is to much. I know this is listed as "could include" but at one point could become "must include."</p> <p>Jeffrey DePriest</p> <p>COM-001-2, M6, M7, and M8, "could include" may some day become "must include": "What" is required is to provide evidence. A list, which could include but is not limited to various forms of evidence is presented for consideration, but the entity may, and is encouraged to do so when it is appropriate, provide other forms of equally appropriate evidence. No change made.</p> <p>R9 define "unsuccessful test."</p> <p>Is it a mechanical failure of equipment or failure of one or more entities to respond to the test?</p> <p>If mechanical failure, does the 2 hour window to initiate repairs mean notification to proper business unit or do repairs have to actually begin (crew investigating). If crews need to be on site 2 hours is too limiting.</p> <p>COM-001-2, R9, define "unsuccessful test": The RCSDT notes that your words are a paraphrase of the actual standard requirement language. In its simple form, a test is unsuccessful when the capability fails to perform as expected. The entity may have an elaborate contract in place with very specific technical specifications within which the capability is to perform. The test may be unsuccessful if it does not meet those technical specifications, although the intent of the standard is for the entities to be able to communicate, usually verbally, with one another so as to operate reliably. The standard does not prescribe the performance expectations for the capability apart from the expectation that communication capability is to exist. The RCSDT recognizes that there may be many variations of service, maintenance, and repair agreement implemented for these communication capabilities. Whatever the agreement provides for initiation of the response and repair is what is required. This standard cannot prescribe all the possible combinations or scenarios. No change made.</p>

Organization	Yes or No	Question 6 Comment
		<p>- R11. Mutual Agreeable time is vague.</p> <p>Barbara Holland</p> <p>COM-001-2, R11, “mutual agreeable time” is too vague: “What” is required is to consult and determine a mutually agreeable time. “How” that is to be done is too prescriptive to be included within a standard because of the great number of possible scenarios, organizational arrangement, and sizes of entities involved. No change made.</p>
<p>Response: See response above.</p>		
<p>Madison Gas and Electric Co.</p>	<p>Negative</p>	<p>COM-001-2:</p> <p>The definition of Interpersonal Communication is: “Any medium that allows two or more individuals to interact, consult, or exchange information.” Recommend that the word "any" be removed from Interpersonal Communication and recommend the new definition be "The primary (or designated) medium that allows two or more individuals to interact, consult, or exchange information."</p> <p>The RCSDT appreciates your comment and has made clarifying changes by removing the phrase “any of” in COM-001, R11. Additionally, the RCSDT made a clarifying change to indicate the DP and GOP only need to consult with the entity affected by the failure.</p> <p>The term “Interpersonal Communication” is a defined term in this standard. As such, it has a different meaning than “Alternative Interpersonal Communication,” thus there should be no confusing of the two. In addition, the word “primary” purposely does not exist in the requirements since the RCSDT did not intend to create a requirement for redundancy. Redundancy continues to be a good practice, but it is not required by this standard. Only that some entities must have both an Interpersonal Communication capability and a designated Alternative Interpersonal Communication capability. No change made.</p>

Organization	Yes or No	Question 6 Comment
		<p>R11, Please note that the use of the word “any” as in “Each Distribution Provider and Generator Operator that experiences a failure of any of its Interpersonal Communication capabilities...” will be viewed as meaning every Interpersonal Communication medium that an Entity has or uses.</p> <p>The RCSDT appreciates your comment and has made clarifying changes by removing the phrase “any of” in COM-001, R11. Additionally, the RCSDT made a clarifying change to indicate the DP and GOP only need to consult with the entity affected by the failure.</p> <p>Recommend R11 be updated to read:</p> <p><i>“Each Distribution Provider and Generator Operator that experiences a failure of any of its primary (or defined) Interpersonal Communication capabilities with its Transmission Operator or Balancing Authority...”</i></p> <p>In that way it focuses it down to the communications issues with the TOP or BA.</p> <p>In lieu of “primary” the SDT could state “defined” as long as it is not meant to be “any.” The latter part of R11 states; “...shall consult with their Transmission Operator or Balancing Authority as applicable to determine a mutually agreeable time to restore the Interpersonal Communication capability.” This ambiguous statement does not support reliability. Consulting with a TOP or BA does not solve the problem of the lack of Interpersonal Communication capabilities. Recommend this to be “...shall consult with inform their Transmission Operator or Balancing Authority as applicable as to determine a mutually agreeable time to restore the status of the Interpersonal Communication capability.”</p> <p>Thus R11 is recommended to read as:</p> <p><i>“Each Distribution Provider and Generator Operator that experiences a failure of its primary (or designated) Interpersonal Communication with their Transmission Operator or Balancing Authority shall inform them, as applicable, as to the status of the Interpersonal Communication capability.”</i></p>

Organization	Yes or No	Question 6 Comment
		<p>This allows for situational awareness and supports the reliability of each system. Additionally, the RCSDT notes that the requirement refers only to Interpersonal Communication capabilities. Adding the phrase “to the primary” is not needed. Please refer to the definitions of Interpersonal Communication and Alternative Interpersonal Communication for clarification. No change made.</p>
<p>Response: See response above.</p>		
<p>New York Independent System Operator</p>	<p>Negative</p>	<p>COM-001-2: The drafting team has complicated the requirements by having different requirements between RC/TOP/BA and other entities such as GOP/LSE/DP. The proposal is for redundancy to be required only between RC/TOP/BA. The requirement should be simplified to require all entities to have plans for loss of primary communication channels. This can include third parties as a communication channel.</p>
<p>Response: The term “Interpersonal Communication” is a defined term in this standard. As such, it has a different meaning than “Alternative Interpersonal Communication,” thus there should be no confusing of the two. In addition, the word “primary” purposely does not exist in the requirements since the RCSDT did not intend to create a requirement for redundancy. Redundancy continues to be a good practice, but it is not required by this standard. Only that some entities must have both an Interpersonal Communication capability and a designated Alternative Interpersonal Communication capability. The DP and GOP are not required to have Alternative Interpersonal Communication; however, R11 addresses the loss of communication capability (plan). No change made.</p>		
<p>Public Utility District No. 1 of Lewis County</p>	<p>Negative</p>	<p>COM-001-2: This standard should be combined with COM-002.</p>
<p>Response: The standard COM-001-2 is capability based (equipment) and COM-002-3 is communication and coordination based. Each fulfills independent concepts. No change made.</p>		
<p>Southwest Transmission</p>	<p>Negative</p>	<p>COM-001-2:</p>

Organization	Yes or No	Question 6 Comment
Cooperative, Inc.		<p>We believe that the VSLs could be written to provide more gradations. For example, if a Transmission Operator or Balancing Authority failed to have Interpersonal Communications capability with a Distribution Provider but had Interpersonal Communications capability with all other required entities, it has met the vast majority of the requirement. Since VSLs are a measure of how much the requirement was missed by the responsible entity, jumping to a Severe VSL does not seem to adequately capture that the responsible entity met the vast majority of the requirement. Requirements R4 and R6 even seem to recognize this by not including Distribution Provider in the list of entities to which the Transmission Operator or Balancing Authority are required to designate Alternate Interpersonal Communications capability.</p>
<p>Response: The RCSDT has applied the VSL to the Severe column because not having Interpersonal Communication capability with any entity is detrimental to reliability. No change made.</p>		
Tennessee Valley Authority	Negative	<p>COM-001-2: We suggest the drafting team look at Standard EOP-008, Requirements R3 and R8 and add appropriate language in Standard COM-001-2, to avoid instantaneous non-compliance for loss of Interpersonal Communications and/or Alternate Interpersonal Communications (R1 and R2).</p>
<p>Response: The RCSDT reviewed both EOP-008-0 and EOP-008-1, which is subject to future enforcement. In either version, the team believes there is no need to add additional language to the standard. No change made.</p> <p>This was not intended by the drafting team. The intent is to give the entity the flexibility in meeting the requirement. A loss of Interpersonal Communication capability is covered by R10, notification of Interpersonal Communication capability failure. No change made.</p>		
Southwest Transmission Cooperative, Inc.	Negative	<p>COM-001-2: We thank the drafting team for its efforts but believe there are still issues that need to be addressed. We thank the drafting team for clarifying that the intent of this</p>

Organization	Yes or No	Question 6 Comment
		<p>standard is not for data exchange in the response to comments.</p> <p>However, we do believe one additional change is necessary to make the intent absolutely clear. The purpose of statement of COM-001-2 still includes the phrase “to exchange Interconnection and operating information.” Since a standard must stand on its own, we believe it is necessary to remove that phrase from the purpose statement to avoid misinterpretations in the future. Auditors and enforcement personnel are not required to understand the development history when enforcing the standard. Furthermore, the purpose is really to enable communications between these functional entities.</p> <p>The SDT agrees and has made a conforming change to the purpose of COM-001.</p> <p>Requirement R11 does not fully address the issue of what is required by Distribution Providers and Generator Operators and introduces new issues.</p> <p>For, “mutually agreeable,” the “what” is required is to consult and determine a mutually agreeable time and the “how” that is to be done is too prescriptive to be included within a standard because of the great number of possible scenarios, organizational arrangement, and sizes of entities involved. No change made.</p> <p>First, while the standard is intended to clarify that the Distribution Provider and Generator Operator do not need backup communications capability, it simply does not. Distribution Providers and Generator Operators are required to have an Interpersonal Communications capability in Requirement R7 and R8 respectively. Unfortunately, the effectiveness of these requirements persists even when the Distribution Provider or Generator Operator experiences a failure of its Interpersonal Communications capability. When Requirement R11 applies, the Distribution Provider or Generator Operator will still be obligated to comply with Requirements R7 and R8 respectively and will, in fact, be in violation of these requirements because the Distribution Provider or Generator Operator no longer has the capability.</p> <p>The RCSDT thanks you for your comment. Requirements R7 and R8 have been revised to account for the failure of Interpersonal Communication capability. The</p>

Organization	Yes or No	Question 6 Comment
		<p>intent of R11 is to require the responsible entity to take action upon the failure of its Interpersonal Communication.</p> <p>Second, capability is used inconsistently between Requirement R7 and R11 which leads to confusion. In Requirement R7, it is singular while in Requirement R11 is plural. It needs to be clear that only the failure of the capability identified in R7 and R8 needs to be reported by the Distribution Provider and Generator Operator respectively.</p> <p>The RCSDT thanks you for your observation. Generally, the singular implies the plural or vice-versa. The RCSDT has corrected R10 and R11 to be consistent with the singular application.</p> <p>Third, if the requirements focused on communications devices rather than capabilities, they would come closer to communicating the intent. Requirement R11 would better complement Requirement R7 and R8 if the focus was on having a communication medium or device. A Generator Operator with an installed communications device or medium still has that device or medium even when it is not functioning properly and could still meet Requirements R7 and R8. However, they don't have the Interpersonal Communications capability if the device is not functioning properly.</p> <p>The RCSDT thanks you for your comment. Requirements R7 and R8 have been revised to account for the failure of Interpersonal Communication capability. The intent of R11 is to require the responsible entity to take action upon the failure of its Interpersonal Communication.</p> <p>We recommend striking "capability" from all of the requirements. It is not clear to us how this helps when a definition for Interpersonal Communications is written already and applies to a communication medium. Furthermore, we think it causes confusion and actually contradicts the intent of the standard. Because Requirements R1, R3, R5, R7 and R8 focus on capability, the responsible entity will be in violation anytime its medium that it uses for the primary capability does not function</p>

Organization	Yes or No	Question 6 Comment
		<p>properly. Whereas if the requirement stated that the responsible entity was to designate a primary communications medium, the responsible entity is not in violation if that medium is not functioning properly. It would be clear that Requirement R2, R4 and R6 are intended to be complementary.</p> <p>The RCSDT believes that prescribing a device or medium would limit an entity; therefore, “capability” is used to avoid being prescriptive and to provide flexibility. This was not intended by the drafting team. The intent is to give the entity the flexibility in meeting the requirement. A loss of Interpersonal Communication capability is covered by R10, notification of Interpersonal Communication capability failure. No change made.</p> <p>Furthermore, it is not clear why Requirements R1, R3, R5, R7 and R8 state that the responsible entity shall “have” when the companion Requirements R2, R4, and R6 state “designate.”</p> <p>Each entity listed must “have” an Interpersonal Communication capability and for Alternative Interpersonal Communication capability able to “designate” the alternate. The team established these requirements to provide flexibility to the industry. No change made.</p> <p>Since Requirement R10 deals with a failure of its Interpersonal Communications capabilities and not Alternate Interpersonal Communications capability, it should only refer to the entities in Requirements R1, R3, and R5. Currently, it includes R1 through R6.</p> <p>The RCSDT thanks you for pointing this out. The RCSDT has modified the language of R10 to refer to R1, R3, and R5, rather than “R1 through R6,” since the responsible entities are limited to the RC, the TOP, and the BA in these requirements.</p>
<p>Response: See response above.</p>		
New York Independent	Negative	COM-002-3: The drafting team added a requirement to identify a Reliability Directive is being initiated during an emergency to track 3-part communication for compliance

Organization	Yes or No	Question 6 Comment
System Operator		<p>purposes. This will change and complicate the communication protocols between normal and emergency operations simply to simplify compliance assessments. The NYISO is asking for clarification that an entity may identify Reliability Directives as a category of communications to be communicated through procedures and training; and will not require a different communication protocol between normal and emergency operations. Affective communications can only be achieved through consistent processes for all conditions. Compliance assessments should be made on when we are in an emergency or not, and not on how the dialogue was initiated.</p>
<p>Response: The RCSdT believes the standard allows for this condition, and the method of implementation is up to the entity. No change made.</p>		
Illinois Municipal Electric Agency	Negative	<p>Illinois Municipal Electric Agency supports and encourages SDT consideration of comments submitted by the SERC OC Standards Review Group.</p>
<p>Response: Thank you for your comment. See response to SERC comments.</p>		
Wisconsin Public Service Corp.	Negative	<p>In COM-002-3, the Standards Drafting Team provided great clarity to the industry and also reduced risk to the BES, by clearly defining Reliability Directives and how the RC, TOP, and BA must utilize them. Unfortunately, they failed to maintain this level of clarity in IRO-001-3, where they state:</p> <p><i>R2. Each Transmission Operator, Balancing Authority, Generator Operator, Distribution Provider shall comply with its Reliability Coordinator’s direction unless compliance with the direction cannot be physically implemented or unless such actions would violate safety, equipment, regulatory or statutory requirements. [Violation Risk Factor: High] [Time Horizon: Real-time Operations, Same Day Operations and Operations Planning]</i></p> <p><i>R3. Each Transmission Operator, Balancing Authority, Generator Operator, and Distribution Provider shall inform its Reliability Coordinator upon recognition of its inability to perform as directed in accordance with Requirement R2. [Violation Risk</i></p>

Organization	Yes or No	Question 6 Comment
		<p><i>Factor: High] [Time Horizon: Real-time Operations, Same Day Operations and Operations Planning]</i></p> <p>The use of “direction” and “directed” essentially makes any request equivalent to a Reliability Directive. In addition, IRO-001-3 as written is largely redundant of COM-002-3. Given this, we recommend that the Standards Drafting Team consider granting the RC authority to issue Reliability Directives by adding this requirement to COM-002-3 and then eliminate IRO-001-3.</p> <p>The RCSDT feels the use of direct and directed is consistent with the purpose and application of those terms in other standards. No change made.</p>
<p>Response: See response above.</p>		
<p>Wisconsin Electric Power Marketing; Wisconsin Electric Power Co.</p>	<p>Negative</p>	<p>IRO-001-03: Although a great improvement over existing IRO-001, see comments:</p> <ul style="list-style-type: none"> -R2 needs to be clear that it is the Reliability Coordinator’s Reliability Directive that must be complied with not just any Reliability Coordinator’s direction as stated. <p>The RCSDT notes that the intent of the standard is not intended to limit the RC authority to Reliability Directives. The Reliability Coordinator issuing the Reliability Directive is the one, which the recipient must comply. It is assumed that a BA or TOP has a relationship with one, and only one, RC for a given Balancing Area or Transmission Operator Area (some may have multiple, disconnected areas, that are subject to different RCs). No change made.</p> <ul style="list-style-type: none"> -The M2 measure could be difficult, as the operator would have to have access to documents proving the safety, equipment, regulatory or statutory requirements, which may be the assessment of an individual applying the safety rule. Is the measure requiring a deposition of the individual to be performed for each instance? <p>In the RCSDT’s opinion, the Measure M2 does not contemplate depositions. If an entity cannot comply with a Reliability Directive for one of the stated reasons, it should have documentation, such as an attestation, to support that stated reason</p>

Organization	Yes or No	Question 6 Comment
		<p>available during an audit. No change made.</p> <p>With an assumed data retention of 90 day (voice) or 12 month document retention, the deposition would be unlikely to be acquired prior to the retention period ending.</p> <p>Data retention is a significant issue when the data being recorded is voluminous, supporting a 90-day retention period. No change made.</p> <p>-R3 needs to be clear that it is the inability to perform the Reliability Coordinator’s Reliability Directive that must be communicated not just any “Reliability Coordinator’s as directed.”</p> <p>The RCSDT believes R3 contains the full communication set of “action or direction” and the subset, Reliability Directive, is included; therefore, the respective entity is still required to inform the RC. The RCSDT believes the requirement is clear in regards to Reliability Directives. No change made.</p> <p>-The Data Retention section does not align with the standard: The Reliability Coordinator shall retain its evidence for the most recent 90 calendar days for voice recordings or 12 months for documentation for Requirement R2, Measure M2.</p> <p>R2 and M2 apply to the Transmission Operator, Balancing Authority, Generator Operator, or Distribution Provider.</p> <p>There is no R4 and M4.</p> <p>Data retention related to IRO-001-2, R2/M2 was changed to agree with your suggestion. The changes were more involved – several sections were changed, including removing the reference to R4/M4.</p>
<p>Response: See response above.</p>		
<p>SERC Reliability Corporation</p>	<p>Negative</p>	<p>IRO-001-3 Comments</p> <p>We recommend that where the verb "direct/directed" or noun "direction" is used in Purpose, R1, R2 and R3, that it be replaced with the verb "instruct/instructed" or</p>

Organization	Yes or No	Question 6 Comment
		<p>noun "instruction", as appropriate. This would help the industry avoid confusion often referred to as "big D" or "little d" directives. It is noted that the term "Reliability Directive" does that to a great degree but avoiding the verb/noun "direct/direction" would augment the difference.</p> <p>The RCSDT feels the use of “direct” and “directed” is consistent with the purpose and application of those terms in other standards. No change made.</p> <p>R1 - At what point in time is "identified" referring to in "to prevent identified events or"? Is it referring to current or future events?</p> <p>The context of “identified” is when a set of system conditions is recognized that could lead to an Emergency or Adverse Reliability Impact, which may require action. See Standards IRO-008 and IRO-009. No change made.</p> <p>One might assume both since the "Time Horizon" is defined as Real-time Operations, Same Day Operations and Operations Planning, but the requirement may be enhanced if explicitly stated ("to prevent events identified in real-time or in the future or to mitigate the magnitude"). For clarity, the scope of the authority should be limited to the Reliability Coordinator Area (that result in an Emergency or Adverse Reliability Impacts within its Reliability Coordinator Area). As written, it implies the authority should extend outside its RC Area.</p> <p>R2 - We question the phrase, “physically implemented,” and recommend that the intent be clarified in the language.</p> <p>The RCSDT believes there may be conditions were an entity might not be able to physically implement the direction. For example, entities that do not have the right to access certain equipment or cannot manually operate a broken apparatus. We feel the proposed language achieves the intended purpose. No change made.</p> <p>We note the following comment and response posted under Consideration of Comments on Initial Ballot , ” Reliability Coordination (Project 2006-06) Date of Initial Ballot: February 25, ” March 7, 2011:</p>

Organization	Yes or No	Question 6 Comment
		<p><i>“IRO-001 R2, R3, and R4 have replaced “Directives with the word direction in lower case (while it appears that “Directives is a subset of “directions). We believe that this muddies the waters and could bring numerous conversations and dialog into scope unnecessarily. The end result is that the RC has the right to issue and use “Directives and anything short of this could just be communications. For example, a number of entities that are Reliability Coordinators also facilitate energy markets. There are many communications related to markets that probably should be out of scope with respect to the standards. Furthermore, it might not be clear what role (e.g. Reliability Coordinator, market operator, etc) the staff at these entities is fulfilling.</i></p> <p><i>Response: IRO-001 is written to cover both typical daily operating scenarios and also emergency scenarios. The required performance encompasses issuing and responding to Reliability Directives as well as other directions. The requirement language specifically ties back to Requirement R2 which states that the RC “shall take actions or direct actions, which could include issuing Reliability Directives.” This is the “direction in accordance with Requirement R2 stated in R3 and the “direction in accordance with Requirement R3 stated in R4. We believe the entity comments remain valid and the response provided by the SDT does not address all aspects of the concern.</i></p> <p>We suggest that the language be changed to “Reliability Directive consistent with COM-002.</p> <p>The word “direction” connects with the language in the R1 (act or direct). Reliability Directives is a subset of “direction.” No change made.</p> <p>R3 - The requirement states the responsible entities shall “inform its RC when unable to perform as directed but it is unclear when the notification needs to take place. Although the term “as soon as practical may seem be un-measurable, as written now there is no time deadline to perform the notification” i.e. it could be 4 hours later after recognition.</p> <p>M2,” need to add the following words “compliance with, physically, unless which</p>

Organization	Yes or No	Question 6 Comment
		<p>were included in R2, therefore M2 should read,</p> <p><i>“Each Transmission Operator, Balancing Authority, Generator Operator, Interchange Coordinator and Distribution Provider shall have and provide evidence which may include, but is not limited to dated operator logs, dated records, dated and time-stamped voice recordings or dated transcripts of voice recordings, electronic communications, or equivalent documentation, that will be used to determine that it complied with its Reliability Coordinator’s direction(s) per Requirement R1 unless compliance with the direction per Requirement R1 could not be physically implemented or unless such actions would have violated safety, equipment, regulatory or statutory requirements. In such cases, the Transmission Operator, Balancing Authority, Generator Operator, Interchange Coordinator or Distribution Provider shall have and provide copies of the safety, equipment, regulatory or statutory requirements as evidence for not complying with the Reliability Coordinator direction. (R2)”</i></p> <p>The RCSDT thanks you for your comment and has added the word “physically” to the IRO-001-2 Measure M2.</p> <p>Section 1.3, the second bullet; need to add calendar to 12 calendar months</p> <p>The RCSDT appreciates your comments and conforming changes have been made to the Data Retention section.</p>
<p>Response: See response above.</p>		
<p>Dominion Virginia Power; Dominion Resources, Inc.</p>	<p>Negative</p>	<p>IRO-001-3: Dominion does not support the use of “Reliability Coordinator’s direction” in IRO-001-3 and would prefer that the language be changed to “Reliability Directive” consistent with the use in COM-002-3.</p>
<p>Response: The word “direction” connects with the language in the R1 (act or direct). Reliability Directives is a subset of “direction.” The RCSDT feels the use of direct and directed is consistent with the purpose and application of those terms in other standards. No</p>		

Organization	Yes or No	Question 6 Comment
change made.		
Constellation Energy Commodities Group	Negative	<p>IRO-001-3:</p> <p>IRO-001-3 uses the term ‘direct’ in its purpose statement, R1, R2 and R3. To avoid confusion with a Reliability Directive (both for auditors and entities), we suggest the following: To establish the authority of Reliability Coordinators to make requests of other entities to prevent an Emergency or Adverse Reliability Impacts to the Bulk Electric System.</p> <p><i>R1: Each Reliability Coordinator shall have the authority to act or request others to act (which could include issuing Reliability Directives) to prevent identified events or mitigate the magnitude or duration of actual events that result in an Emergency or Adverse Reliability Impacts.</i></p> <p><i>R2: Each Transmission Operator, Balancing Authority, Generator Operator, Distribution Provider shall comply with its Reliability Coordinator’s request unless compliance with the request cannot be physically implemented, or unless such actions would violate safety, equipment, regulatory or statutory requirements, or unless the TOP, BA, GOP or DP convey a business reason not to comply with the request but express that they will comply if a Reliability Directive is given.</i></p> <p><i>R3: Each Transmission Operator, Balancing Authority, Generator Operator, and Distribution Provider shall inform its Reliability Coordinator upon recognition of its inability to perform as requested in accordance with Requirement R2.</i></p>
<p>Response: This standard provides for the authority of the RC to act or direct actions, and not request. The RCS DT believes by using the word “request” make the requirement conditional and is not consistent with the purpose of the standard. No change made.</p>		
Tampa Electric Co.	Negative	<p>IRO-001-3:</p> <p>R1 VSL should have the phrase "exercise their authority" inserted between "to" and "take" in the first sentence. Otherwise it could be read that the RC would be in violation of the standard requirement for any event that resulted in an Adverse</p>

Organization	Yes or No	Question 6 Comment
		Reliability Impact whether he issued a Reliability Directive or not.
<p>Response: Thank you for your comment. The RCSDT has added the additional clarifying language.</p>		
Independent Electricity System Operator	Negative	<p>IRO-001-3: The IESO is unable to support this standard as written since Data Retention Section does not reflect the revised requirements. For examples: the Electric Reliability Organization is no longer a responsible entity; the Reliability Coordinator should replace the ERO for keeping data for R1; Transmission Operator, Balancing Authority, Generator Operator and Distribution Provider should replace the Reliability Coordinator for keeping data for R2; and there is no R4/M4.</p>
<p>Response: The RCSDT agrees and has made conforming changes in Data Retention.</p>		
Southwest Transmission Cooperative, Inc.	Negative	<p>IRO-001-3: We thank the drafting team for their efforts but believe this standard needs additional work. We disagree with including “authority” in this standard. FERC Order 693a, paragraph 112, made it clear that the authority of a registered entity is established through the approval of the standards by FERC. Thus, a Reliability Coordinator gets its authority to issue Reliability Directives by having a requirement that states it must issue Reliability Directives approved by the Commission. Please change “shall have authority to act” in Requirement R1 back to “shall act.” Please also remove all other vestiges of authority from the standards including in the purpose, measures and VSLs. Requirement R1 should require the use of Reliability Directives. The requirement compels the Reliability Coordinator “to direct others to act to prevent identified events or mitigate the magnitude or duration of actual events that result in an Emergency or Adverse Reliability Impact.” Reliability Directives are necessary to address Adverse Reliability Impacts or Emergencies and</p>

Organization	Yes or No	Question 6 Comment
		<p>trigger the use of three-part communications identified in COM-002-3.</p> <p>The RCSDT believes that other standards (i.e., IRO-009 - R3 & R4, EOP-002 - R1 and R8) address the action of others; and if the term “authority” is omitted, creates a generic requirement. Such as what has been suggested puts the RC in a double jeopardy situation. No change made.</p> <p>The word “direction” connects with the language in the R1 (act or direct). Reliability Directives is a subset of “direction.” No change made.</p> <p>COM-002-3 R1 really compels the Reliability Coordinator to use a Reliability Directive for Emergencies and Adverse Reliability Impacts with the opening clause: “When a Reliability Coordinator, Transmission Operator, or Balancing Authority determines actions need to be executed as a Reliability Directive.” What else could be more important for a Reliability Coordinator to issue a Reliability Directive than for an Emergency or Adverse Reliability Impact?</p> <p>Thus, not requiring the use of Reliability Directives for Adverse Reliability Impacts and Emergencies makes IRO-001-3 R1 and COM-002-3 R1 inconsistent. For clarity and consistency, Requirement R2 and R3 should also be clear that the responsible entities will respond to the Reliability Coordinator’s Reliability Directives.</p> <p>The RCSDT notes that IRO-001-3 addresses direction, which may include a Reliability Directive. The responsible entity receiving the direction, at a minimum, must comply with the RC’s direction, unless the receiver cannot physically implement or unless such actions would violate safety, equipment, regulatory, or statutory requirements. The standard IRO-001-3 is not limited to only actions that are Reliability Directives. On the other hand, the standard COM-002-3 requires the BA, RC, and TOP to identify the communication as a Reliability Directive and to use three-part communication when actions are required to be executed as a Reliability Directive. No change made.</p> <p>Furthermore, this would make the standard consistent with how Reliability Directives are handled by the Transmission Operator in the draft TOP-001-2 standard proposed by the Real-Time Operations drafting team (Project 2007-03). We do not agree with</p>

Organization	Yes or No	Question 6 Comment
		<p>the need to include Distribution Provider in IRO-001-3. The Distribution Provider will likely never receive a Reliability Directive directly from its Reliability Coordinator. More likely, the Reliability Directive will be issued by the Transmission Operator or Balancing Authority depending on if the issue is security or adequacy related.</p> <p>The RCSDT notes that IRO-001-3 is an authority standard, the DP may not likely receive a Reliability Directive from the RC; however, in the case they do, they are required to comply with the requirement. No change made.</p>
<p>Response: See response above.</p>		
Northeast Utilities	Negative	NU contributed in and joins on the comments submitted by NPCC.
<p>Response: Thank you for your comment.</p>		
MidAmerican Energy Co.	Negative	<p>COM-001-2:</p> <p>The definition of Interpersonal Communication is too broad and should be revised to read,</p> <p><i>"the primary defined communication system used to communicate between NERC defined reliability entities when operating the Bulk Electric System."</i></p> <p>Examples may include a telephone system as a primary system and an email system as an alternative system.</p> <p>R11 is too broad and should either be deleted or revised to read:</p> <p><i>"Each Distribution Provider and Generator Operator that experiences a failure of its defined primary Interpersonal Communication capabilities with its Transmission Operator or Balancing Authority..."</i></p> <p>The RCSDT deliberately avoided the use of primary and secondary mediums and elected to use communications capabilities. As such, R11 applies to Interpersonal Communication capabilities of the DP and GOP. The RCSDT has gone to great lengths</p>

Organization	Yes or No	Question 6 Comment
		<p>to provide some flexibility for those DPs and GOPs with little or no impact on the reliability of the BES. FERC directed NERC to provide for this consideration. Therefore, we use the language as proposed in R11. Mutually agreeable implies that both parties are willing to accept the outcome. It doesn't mean that a DP or GOP must comply with the wishes of its TOP or BA because as you state that could be beyond the control of the DP or GOP. No change made.</p> <p>The use of the word "any" could end up applying to an intercom and not to a primary mode of communication such as telephone system or email system.</p> <p>The RCSDT appreciates your comment and has made clarifying changes by removing the phrase "any of" in COM-001, R11. Additionally, the RCSDT made a clarifying change to indicate the DP and GOP only need to consult with the entity affected by the failure.</p> <p>The latter part of R11 states; "...shall consult with their Transmission Operator or Balancing Authority as applicable to determine a mutually agreeable time to restore the Interpersonal Communication capability." This ambiguous statement does not support reliability. Consulting with a TOP or BA does not solve the problem of the lack of Interpersonal Communication capabilities. This statement should be deleted or revised to read:</p> <p><i>"Each Distribution Provider and Generator Operator that experiences a failure of its defined primary Interpersonal Communication with their Transmission Operator or Balancing Authority shall notify the applicable TOP or BA as to the status of the Interpersonal Communication capability."</i></p> <p>The RCSDT believes non-compliance is not due solely to the failure of any Interpersonal Communication capability, but must be accompanied by a failure to consult with the applicable Transmission Operator or Balancing Authority to establish mutually agreeable action for restoration. No change made.</p>
<p>Response: See response above.</p>		

Organization	Yes or No	Question 6 Comment
<p>SERC OC Standards Review Group</p>		<p>COM-001-2 Comments</p> <p>Definition of Alternative Interpersonal Communication:</p> <p>The proposed definition uses the term “medium.”</p> <p>What is the scope of that?</p> <p>Telephony is a “medium” but there is wired, wireless, satellite, etc. Was “medium” intended to differentiate voice, paper, text, email, teletype, or something else?</p> <p>Does the qualifying term “same” when modifying infrastructure mean something like voice versus written?</p> <p>What about situations where the primary telephone system is Voice Over Internet Protocol (VOIP) and it is using the same computer network infrastructure as an email or messaging system. That is the “same infrastructure” but a different “medium” R1 and R2 –</p> <p>The RCSDT believes that prescribing a device or medium would limit an entity; therefore, “capability” is used to avoid being prescriptive and to provide flexibility. This was not intended by the drafting team. The intent is to give the entity the flexibility in meeting the requirement. A loss of Interpersonal Communication capability is covered by R10, notification of Interpersonal Communication capability failure. No change made.</p> <p>We suggest the drafting team look at Standard EOP-008, Requirements R3 and R8 and add appropriate language in Standard COM-001-2, to avoid instantaneous non-compliance for loss of Interpersonal Communications and/or alternate Interpersonal communications.</p> <p>The RCSDT reviewed both EOP-008-0 and EOP-008-1, which is subject to future enforcement. In either version, the team believes there is no need to add additional language to the standard.</p> <p>The RCSDT believes that prescribing a device or medium would limit an entity;</p>

Organization	Yes or No	Question 6 Comment
		<p>therefore, “capability” is used to avoid being prescriptive and to provide flexibility. This was not intended by the drafting team. The intent is to give the entity the flexibility in meeting the requirement. A loss of Interpersonal Communication capability is covered by R10, notification of Interpersonal Communication capability failure. No change made.</p> <p>R1 - In later requirements it is proposed that the entity “...shall designate an...” It is suggested that for consistency and audit ability, this concept be used for R1, R3, R5, R7 and R8.</p> <p>In addition, the qualifier of “primary” should be used such that the requirements read:</p> <p><i>“... shall have designated, primary Interpersonal Communications capability with the following entities:”</i></p> <p>Although it is appropriate that “Alternative” be capitalized since it is used in a defined term (i.e. Alternative Interpersonal Communication”) that bounds acceptable alternative methods , we do not see the need to capital “primary.”</p> <p>Each entity listed must “have” an Interpersonal Communication capability and for Alternative Interpersonal Communication capability able to “designate” the alternate. The team established these requirements to provide flexibility to the industry. No change made.</p> <p>R9 - The requirement is unclear if the required monthly test is a general functionality test or if there is the expectation of testing the designated Alternative Interpersonal Communications with all of the entities defined in the sub-requirements of R2, R4, and R6.</p> <p>There is no expectation of testing the primary Interpersonal Communications - is this intentional or an oversight?</p> <p>Although functional testing of this should be done as a normal course of business, should an explicit test be required with each entity in the sub-requirements of R1,</p>

Organization	Yes or No	Question 6 Comment
		<p>R3, R5, R7 and R8 to insure, for example, that all the phone numbers are correct?</p> <p>COM-001-2, R9: The requirement is to initiate repair or designate an Alternative Interpersonal Communication capability within two hours. The requirement is not to have the repair completed within two hours. The requirement recognizes that the entity may use its Alternative Interpersonal Communication capability now as its Interpersonal Communication capability, and then, if it decides to do so, designate another, if you may, “new” Alternative Interpersonal Communication capability. This is not required, but is an option that the entity can consider. The entity may already have a maintenance and repair agreement in place that will respond and repair the failed capability. No change made.</p> <p>R10 - The following scenario seems plausible:</p> <p>The Interpersonal Communications fails and is detected at 14:00 and gets fixed at 14:35. It lasted more than 30 minutes but is fixed. As written the requirement would require the responsible entity to notify entities identified in R1 through R6 by 15:00 (i.e. 60 minutes from detection) even though the problem no longer exists. Is that the expectation?</p> <p>The RCSDT proposes that upon detection of failure that continues at least 30 minutes, starts the 60-minute clock. The 30 minutes allows an entity time to restore or determine if they can restore its Interpersonal Communication capability before the clock starts. No change made.</p> <p>Does COM-001 apply only to primary control centers or back-ups, per EOP-008, as well?</p> <p>The RCSDT reviewed both EOP-008-0 and EOP-008-1, which is subject to future enforcement. In either version, the team believes there is no need to add additional language to the standard. No change made.</p> <p>The RCSDT believes that prescribing a device or medium would limit an entity; therefore, “capability” is used to avoid being prescriptive and to provide flexibility. This was not intended by the drafting team. The intent is to give the entity the</p>

Organization	Yes or No	Question 6 Comment
		<p>flexibility in meeting the requirement. A loss of Interpersonal Communication capability is covered by R10, notification of Interpersonal Communication capability failure. No change made.</p> <p>M9 reads <i>“at least on a monthly basis.”</i> We suggest that this be changed to <i>“at least once per calendar month”</i> as written in R9. This change should also be corrected in the VSLs.</p> <p>The RCSDT agrees and the language in M9 has been changed to agree with the language in R9 and the VSL.</p> <p>M8 - We suggest removing the second <i>“that”</i> in the first sentence of the measure.</p> <p>COM-001-2, M8: The RCSDT agrees and the language in M8 has been changed to delete the additional <i>“that.”</i></p> <p>M10 - We suggest this be revised to coincide with changes made in R10 (deleting impacted and adding as identified in Requirements R1 through R6), therefore M10 should read:</p> <p><i>“Each Reliability Coordinator, Transmission Operator, and Balancing Authority, shall have and provide upon request evidence that it notified entities as identified in Requirements R1 through R6 within 60 minutes of the detection of a failure of its Interpersonal Communications capabilities that lasted 30 minutes or longer. Evidence could include, but is not limited to dated operator logs, dated voice recordings or dated transcripts of voice recordings, electronic communications, or equivalent evidence. (R10.)”</i></p> <p>The word <i>“impacted”</i> was removed in previous postings. For further clarification, the RCSDT has modified M10 to remove the word <i>“impacted”</i> to be consistent with R10. For additional clarity, the RCSDT also changed the phrase in R10 and M10, <i>“R1 through R6”</i> to <i>“R1, R3, and R5,”</i> to clarify that it applies to the capabilities with the RC, the TOP and the BA.</p> <p>M12 needs to be removed.</p>

Organization	Yes or No	Question 6 Comment
		<p>The RCSDT appreciates your comment and has deleted Measure M12 that was left in error.</p> <p>We question why the first paragraph of Section 1.3 - Data Retention has been included in each of these three standards. We suggest that it should be removed from each standard.</p> <p>The RCSDT thanks you for your comments. The Data Retention language has been updated to be consistent with the Standards Drafting Guidelines.</p> <p>COM-002-3 Comments</p> <p>R2 - We recommend that the following phrase (in quotes) be added to R2:</p> <p>Each Balancing Authority, Transmission Operator and Distribution Provider that is the recipient of a Reliability Directive shall repeat, restate, rephrase or recapitulate the Reliability Directive “immediately upon receiving it.” As written, there is no limit as to when the entity must repeat it (i.e. they could wait 2 hours)The Standard is not clear as to what each entity is to do when more than one entity receives a Reliability Directive at the same time (e.g. during a RC area teleconference call). For example, is a roll call of receiving entities expected to be held so that they individually can repeat, restate, rephrase or recapitulate the Reliability Directive followed by individual confirmation required in R3?</p> <p>The requirement is aimed at being a performance-based requirement and states a description of “what” communication must take place, but does not prescribe “how” the communication is to be made. Adding the suggested phrase “immediately upon receiving it” introduces the ambiguous term “immediately,” for which there is neither plain meaning nor simple explanation. What must happen is that the recipient must respond in such a way that the issuer may determine whether the message has been properly understood. The RCSDT concludes that the proposed language gives plain meaning. No change made.</p> <p>IRO-001-3 Comments</p>

Organization	Yes or No	Question 6 Comment
		<p>We recommend that where the verb “direct/directed” or noun “direction” is used in Purpose, R1, R2 and R3, that it be replaced with the verb “instruct/instructed” or noun “instruction”, as appropriate. This would help the industry avoid confusion often referred to as “big D” or “little d” directives. It is noted that the term “Reliability Directive” does that to a great degree but avoiding the verb/noun “direct/direction” would augment the difference.</p> <p>The RCSDT feels the use of “direct” and “directed” is consistent with the purpose and application of those terms in other standards. No change made.</p> <p>R1 - At what point in time is “identified” referring to in “...to prevent identified events or...?” Is it referring to current or future events? One might assume both since the “Time Horizon” is defined as Real-time Operations, Same Day Operations and Operations Planning, but the requirement may be enhanced if explicitly stated (“...to prevent events identified in real-time or in the future or to mitigate the magnitude...”).</p> <p>The context of “identified” is when a set of system conditions is recognized that could lead to an Emergency or Adverse Reliability Impact, which may require action. See standards IRO-008 and IRO-009. No change made.</p> <p>For clarity, the scope of the authority should be limited to the Reliability Coordinator Area (“...that result in an Emergency or Adverse Reliability Impacts within its Reliability Coordinator Area”). As written, it implies the authority should extend outside its RC Area.</p> <p>The RCSDT believes that limiting the scope to the RC’s area would be too limiting and not account for potential conditions where an adjacent RC may have lost its wide-area view and requests the assistance of another RC or vice-versa. No change made.</p> <p>R2 - We question the phrase “physically implemented” and recommend that the intent be clarified in the language.</p> <p>The RCSDT believes there may be conditions where an entity may not be able to physically implement the direction. For example, an entity that does not have the</p>

Organization	Yes or No	Question 6 Comment
		<p>right to access certain equipment or cannot manually operate a broken apparatus. We feel the proposed language achieves the intended purpose. No change made.</p> <p>We note the following comment and response posted under Consideration of Comments on Initial Ballot - Reliability Coordination (Project 2006-06) Date of Initial Ballot: February 25 - March 7, 2011:</p> <p><i>“IRO-001 R2, R3, and R4 have replaced “Directives” with the word direction in lower case (while it appears that “Directives” is a subset of “directions”). We believe that this muddies the waters and could bring numerous conversations and dialog into scope unnecessarily. The end result is that the RC has the right to issue and use “Directives” and anything short of this could just be communications. For example, a number of entities that are Reliability Coordinators also facilitate energy markets. There are many communications related to markets that probably should be out of scope with respect to the standards. Furthermore, it might not be clear what role (e.g., Reliability Coordinator, market operator, etc) the staff at these entities is fulfilling. Response: IRO-001 is written to cover both typical daily operating scenarios and also emergency scenarios. The required performance encompasses issuing and responding to Reliability Directives as well as other directions. The requirement language specifically ties back to Requirement R2 which states that the RC “shall take actions or direct actions, which could include issuing Reliability Directives.” This is the “direction in accordance with Requirement R2” stated in R3 and the “direction in accordance with Requirement R3” stated in R4.”We believe the entity’s comments remain valid and the response provided by the SDT does not address all aspects of the concern.</i></p> <p>The word “direction” connects with the language in the R1 (act or direct). Reliability Directives is a subset of “direction.” No change made.</p> <p>We suggest that the language be changed to “Reliability Directive” consistent with COM-002.</p> <p>R3 - The requirement states the responsible entities shall “inform” its RC when</p>

Organization	Yes or No	Question 6 Comment
		<p>unable to perform as directed but it is unclear when the notification needs to take place. Although the term “as soon as practical” may seem be un-measurable, as written now there is no time deadline to perform the notification - i.e. it could be 4 hours later after recognition.</p> <p>The proposed requirement uses the term “upon recognition.” No change made.</p> <p>M2 - need to add the following words “compliance with, physically, unless” which were included in R2, therefore M2 should read:</p> <p>The RCSDT thanks you for your comment and has added the word “physically” to the IRO-001-2, Measure M2.</p> <p><i>“Each Transmission Operator, Balancing Authority, Generator Operator, Interchange Coordinator and Distribution Provider shall have and provide evidence which may include, but is not limited to dated operator logs, dated records, dated and time-stamped voice recordings or dated transcripts of voice recordings, electronic communications, or equivalent documentation, that will be used to determine that it complied with its Reliability Coordinator’s direction(s) per Requirement R1 unless compliance with the direction per Requirement R1 could not be physically implemented or unless such actions would have violated safety, equipment, regulatory or statutory requirements. In such cases, the Transmission Operator, Balancing Authority, Generator Operator, Interchange Coordinator or Distribution Provider shall have and provide copies of the safety, equipment, regulatory or statutory requirements as evidence for not complying with the Reliability Coordinator’s direction”</i></p> <p>(R2) “Section 1.3, the second bullet; need to add calendar to 12 calendar months.” The comments expressed herein represent a consensus of the views of the above named members of the SERC OC Standards Review group only and should not be construed as the position of SERC Reliability Corporation, its board or its officers.”</p> <p>The RCSDT appreciates your comments and conforming changes have been made to the Data Retention section.</p>

Organization	Yes or No	Question 6 Comment
<p>Response: See response above.</p>		
<p>Pacific Northwest Generating Cooperative</p>		<p>The PNGC Comment Group believes COM-002-3, R2, lacks justification for applicability to a Distribution Provider (DP). RCs in the WECC region do not communicate reliability directives to DP only entities. Having this requirement apply to DPs seems to indicate that we will need 24/7 communications capability to record and respond to calls that will never come in order to satisfy the requirement with no improvement to reliability. The SDT’s response from the last round of comments:</p> <p>“It is the expectation that an issuer of a Reliability Directive would request a return call by the Distribution Provider operating personnel, then issue the Reliability Directive.” Nowhere is this expectation provided for in the written standard. If the issuer of a reliability directive has already called the DP, are they going to then re-issue the reliability directive after the DP calls them back?</p>
<p>Response: In COM-002-3, the DP may or may not receive a Reliability Directive from the RC; however, in the case they do, they are required to comply with the requirement. The measures do not require recordings. Evidence may include things like dated operator logs. No change made.</p>		
<p>Northeast Power Coordinating Council</p>		<p>For COM-001:</p> <p>1. R1.2 and R2.2: The phrase “within the same Interconnection” is improper; it needs to be removed. RCs between two Interconnections still need to communicate with each other for reliability coordination (e.g. between Quebec and the other RCs in the NPCC region to coordinate reliability issues including curtailing interchange transactions crossing an Interconnection boundary). The SDT’s response to industry comments on the previous posting that the phrase was added to address the ERCOT situation (that ERCOT does not need to communicate with other RCs and that such coordination takes place between TOPs) leaves a reliability gap.</p> <p>Requirement R1 addresses a reliability need for adjacent Reliability Coordinators synchronously connected within the same Interconnection to have Interpersonal</p>

Organization	Yes or No	Question 6 Comment
		<p>Communication capability; however, it does not preclude or limit the Reliability Coordinator from establishing Interpersonal Communication capability with others. The RCSDT does not see where there is a need to communicate with other Reliability Coordinator’s from one interconnection to another. No change made.</p> <p>2. R3.5 and R4.3: The phrase “synchronously connected within the same Interconnection” is also improper; it needs to be removed. TOPs do communicate with other TOPs including those asynchronously connected and in another Interconnection (e.g. between Quebec and all of its asynchronously interconnected neighbors). The reason that was used in response to the above comments (coordination among TOPs for DC tie operation) contradicts with the inclusion of this phrase in R3.5 and R4.3.</p> <p>The RCSDT has made clarifying changes by adding Parts to R3 and R4 to address asynchronous connections between Transmission Operators and have eliminated the phrase “within the same interconnection.”</p> <p>COM-001-2, R3.5 and R4.3: Use of the phrase “within the same interconnection.” The RCSDT recognizes that operating activities occurring inside an interconnection that is not synchronously interconnected with another interconnection cannot cause immediate effects upon that interconnection. Any changes in flow across any asynchronous tie between those interconnections must take place through a coordinated interchange energy scheduling process, except for contingency loss the asynchronous ties. In the case of the latter, there is no other path which can be used to address the loss of the asynchronous tie, nor is any synchronous tie immediately affected. The standard does not require such involved RCs to have Interpersonal Communication capability, but does not preclude it. Any rearrangement of scheduled flows on other asynchronous ties must be done through a pre-existing interchange energy scheduling process. No change made.</p> <p>3. R4 and R6: Not requiring an Alternative Interpersonal Communication capability between the BAs and the DP and GOP can result in a reliability gap. If Interpersonal Communication capability between the BAs and these entities is required to begin</p>

Organization	Yes or No	Question 6 Comment
		<p>with to enable BAs to communicate with these entities (such as operating instructions or Reliability Directives) to ensure reliable operations, then an alternative capability is also needed to ensure this objective is achieved when the primary capability fails.</p> <p>The RCSDT refers the Order No. 693 in Paragraph 508 to clarify the reason the DP and GOP are not required to have Alternative Interpersonal Communication and is as follows: “(1) expands the applicability to include Generator Operators and Distribution Providers and includes Requirements for their telecommunications facilities; (2) identifies specific requirements for telecommunications facilities for use in normal and Emergency conditions that reflect the roles of the applicable entities and their impact on Reliable Operation and (3) includes adequate flexibility for compliance with the Reliability Standard, adoption of new technologies and cost-effective solutions.” In addition, R11 requires the DP and GOP to consult with its BA and TOP to determine a mutually agreeable action for restoration. No change made.</p> <p>4. To preclude the possibility of problems arising from having different languages spoken between entities, COM-001-1.1 R4 should remain as it was or those ideas kept in the revised requirement. R4 read:</p> <p><i>“R4. Unless agreed to otherwise, each Reliability Coordinator, Transmission Operator, and Balancing Authority shall use English as the language for all communications between and among operating personnel responsible for the real-time generation control and operation of the interconnected Bulk Electric System. Transmission Operators and Balancing Authorities may use an alternate language for internal operations.”</i></p> <p>According to the proposed implementation plan for COM-001-2, R4 pertaining to the use of English will remain in effect upon the effective date of COM-001-3. This requirement is being revised and will be included in Standard COM-003-1, Operating Personnel Communications Protocols. COM-001-1.1, R4 will be retired at midnight the day before COM-003-1 becomes effective. No change made.</p>

Organization	Yes or No	Question 6 Comment
		<p>5. Measure M3 does not cover the added R3.5 condition (having Interpersonal Communications capability with each adjacent TOP). M3 needs to be revised.</p> <p>The RCSDT thanks you for your comment and has made conforming changes to make to Measure, M3.</p> <p>For IRO-001:</p> <p>The Data Retention Section does not reflect the revised requirements. As examples: the Electric Reliability Organization is no longer a responsible entity; the Reliability Coordinator should replace the ERO for keeping data for R1.</p> <p>Transmission Operator, Balancing Authority, Generator Operator and Distribution Provider should replace the Reliability Coordinator for keeping data for R2.</p> <p>And, in the Data Retention Section, R4 and M4 are mentioned. However, there are only three requirements with their corresponding measures in the standard.</p>
<p>Response: The RCSDT thanks you for your comment and has made conforming changes to IRO-001-3.</p>		
MRO NSRF		<p>Has the SDT looked at combining COM-002-3 and IRO-001-3 into a single Standard? It would allow Entities a one stop shopping place to refer to issuing and receiving a Reliability Directive.</p> <p>The RCSDT understands some of the benefits with combining the standards; however, at this juncture, it would further delay the progress of the standards. No change made.</p> <p>The definition of Interpersonal Communication is:</p> <p>“Any medium that allows two or more individuals to interact, consult, or exchange information.” As stated in Question 4, the use of the word “any” will bring in mediums that are outside the scope of this Standard.</p> <p>The RCSDT appreciates your comment and has made clarifying changes by removing the phrase “any of” in COM-001, R11. Additionally, the RCSDT made a clarifying</p>

Organization	Yes or No	Question 6 Comment
		<p>change to indicate the DP and GOP only need to consult with the entity affected by the failure.</p> <p>The NSRF recommends the following:</p> <p>Interpersonal Communication: The primary (or designated) medium that allows two or more individuals to interact, consult, or exchange information.</p> <p>The RCSDT emphasizes the requirement refers only to Interpersonal Communication capabilities. Adding the phrase “to the primary” is not needed. Please refer to the definitions of Interpersonal Communication and Alternative Interpersonal Communication for clarification. No change made.</p> <p>In Standard COM-002-3 the MRO NSRF recommends that the Effective Date be the first day of the second calendar quarter after applicable regulatory approval, to be the same as COM-001-2 and IRO-001-3. In that way all 3 standards would be effective at the same time, making implementation much smoother.</p> <p>The RCSDT thanks you for your comment and has made conforming changes to adjust IRO-001 to be the same as COM-001 and COM-002.</p> <p>The below section will lead to entities hold evidence past the 12 month retention period. This ambiguous wording will force entities to hold data past the 12 month period as stated in the following paragraph, after the below sighting. Recommend that the first paragraph within 1.3 be deleted in its entirety.</p> <p>1.3. Data Retention The following evidence retention periods identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit.</p> <p>The RCSDT thanks you for your comments. The Data Retention language has been updated to be consistent with the Standards Drafting Guidelines.</p>

Organization	Yes or No	Question 6 Comment
<p>Response: See response above.</p>		
<p>CCG, CPG, CECD</p>		<p>Comments: IRO-001-3 uses the term ‘direct’ in its purpose statement, R1, R2 and R3. To avoid confusion with a Reliability Directive (both for auditors and entities), we suggest the following: To establish the authority of Reliability Coordinators to make requests of other entities to prevent an Emergency or Adverse Reliability Impacts to the Bulk Electric System.</p> <p>The RCSDT feels the use of “direct” and “directed” is consistent with the purpose and application of those terms in other standards. No change made.</p> <p>R1: Each Reliability Coordinator shall have the authority to act or request others to act (which could include issuing Reliability Directives) to prevent identified events or mitigate the magnitude or duration of actual events that result in an Emergency or Adverse Reliability Impacts.</p> <p>The RCSDT feels the use of “direct” and “directed” is consistent with the purpose and application of those terms in other standards. The RCSDT believes by using the word “request” make the requirement conditional and is not consistent with the purpose of the standard. No change made.</p> <p>R2: Each Transmission Operator, Balancing Authority, Generator Operator, Distribution Provider shall comply with its Reliability Coordinator’s request unless compliance with the request cannot be physically implemented, or unless such actions would violate safety, equipment, regulatory or statutory requirements, or unless the TOP, BA, GOP or DP convey a business reason not to comply with the request but express that they will comply if a Reliability Directive is given.</p> <p>The RCSDT feels the use of “direct” and “directed” is consistent with the purpose and application of those terms in other standards. The RCSDT believes by using the word “request” make the requirement conditional and is not consistent with the purpose of the standard. No change made.</p> <p>R3: Each Transmission Operator, Balancing Authority, Generator Operator, and</p>

Organization	Yes or No	Question 6 Comment
		<p>Distribution Provider shall inform its Reliability Coordinator upon recognition of its inability to perform as requested in accordance with Requirement R2.</p> <p>The RCSDT feels the use of “direct” and “directed” is consistent with the purpose and application of those terms in other standards. The RCSDT believes by using the word “request” make the requirement conditional and is not consistent with the purpose of the standard. No change made.</p>
<p>Response: See response above.</p>		
<p>LG&E and KU Services Company</p>		<p>COM-001-2</p> <p>Regarding COM-001-2 and proposed definitions, LG&E and KU Services recommends changing the terms being defined from “Interpersonal Communications” and “Alternative Interpersonal Communication” to “Means for Interpersonal Communication” and “Alternative Means for Interpersonal Communication.” A communication is an exchange of information, not a medium. The medium is simply the means. LG&E and KU Services Company further recommend that each requirement be rewritten with these new defined terms as appropriate and that the word “capabilities” currently following the defined terms be removed from each of the requirements.</p> <p>We suggest the definition for “Means for Interpersonal Communication” be: “A medium utilizing electromagnetic energy that allows two or more individuals to interact, consult or exchange information.”</p> <p>We suggest the definition for “Alternative Means for Interpersonal Communication” be: “Any Means for Interpersonal Communication that is able to serve as a substitute for, and does not utilize the same infrastructure (medium) as, Means for Interpersonal Communications used for day-to-day operation.”</p> <p>The RCSDT thanks you for your comment; however, great lengths were taken in communicating mediums regarding IC and AIC and finds that adding “Means” to the</p>

Organization	Yes or No	Question 6 Comment
		<p>proposed terms being defined diminishes clarity of the definition. No change made.</p> <p>Finally, LG&E and KU Services Company request clarification that the requirements to have in place Interpersonal Communications and Alternative Interpersonal Communications do not establish non-compliance for the unavailability of either medium provided the reporting requirements set forth in the standard are otherwise met.</p> <p>The RCSDT believes a condition of non-compliance will not be created if the entity meets all of the requirements for Interpersonal Communication and Alternative Interpersonal Communication capability. For example, the applicable entity has a failure of the IC and notifies the identified entities and begins using its AIC. No change made.</p> <p>All Proposed Standards LG&E and KU Services Company suggest that the first paragraph in section 1.3 Data Retention be removed from all proposed standards. It states: ...For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit. While LG&E and KU Services Company is confident that the SDT intended to clarify entities' data retention responsibilities, this paragraph could be clarified to indicate that it does not require that any additional evidence be retained and provided beyond that written in the standard's requirements.</p> <p>The RCSDT thanks you for your comments. The Data Retention language has been updated to be consistent with the Standards Drafting Guidelines.</p>
<p>Response: See response above.</p>		
<p>Bonneville Power Administration</p>		<p>BPA supports COM-001-2, COM-002-3 and IRO-001-3 as written and has no comments or concerns at this time.</p>

Organization	Yes or No	Question 6 Comment
Response: Thank you for your comment.		
SPP Standards Review Group		<p>COM-001-2:</p> <p>Requirement 10 is too open ended as written.</p> <p>The measure, M10, indicates that only impacted entities need to be notified. The requirement should be changed to make it consistent with the measure. The requirement would then read:</p> <p><i>“Each RC, TOP And BA shall notify impacted entities as identified...”</i></p> <p>Requirements 3 and 5 places the responsibility for establishing Interpersonal Communication capability on the TOP and BA. It is quite conceivable that a TOP or BA may not know all, or newly, registered DPs and GOPs in its respective area.</p> <p>The word “impacted” was removed in previous postings. For further clarification, the RCSDT has modified M10 to remove the word “impacted” to be consistent with R10. For additional clarity, the RCSDT also changed the phrase in R10 and M10, “R1 through R6” to “R1, R3, and R5” to clarify that it applies to the capabilities with the RC, the TOP, and the BA.</p> <p>In Requirements 7 and 8, the DP and GOP, respectively, are in turn responsible for establishing Interpersonal Communication capability. The TOPs/BAs and the DPs/GOPs should not be responsible for this. The DPs and GOPs should be held accountable for requesting that capability of their TOP and BA.</p> <p>The standard establishes requirement for communication capability appropriate to ensure reliability. There is no requirement for it to be different from the Interpersonal Communication capability that its Balancing Authority has with it, nor the Interpersonal Communication capability that its Transmission Operator has with it. Cooperation and coordination is always encouraged and is an excellent practice, but is not required by this standard. Thank you for your suggestion. No change made.</p>

Organization	Yes or No	Question 6 Comment
		<p>Therefore, we suggest adding the following phrase at the end of Requirements 3.3, 3.4, 5.3 and 5.4 - 'that has requested Interpersonal Communications capability.' Then R3.3 would read:</p> <p><i>“Each Distribution Provider within its Transmission Operator Area that has requested Interpersonal Communications capability.”</i></p> <p>The SDT does not agree that these changes to R3.3, R3.4, R5.3 and R5.4 are necessary. The current R7 and R8 require the DP and the GOP to have this capability. It is not a request. No change made.</p> <p>COM-002-3:</p> <p>Requirement 2/Measure 2: There is an inconsistency between the requirement and the measure. The requirement allows the recipient to repeat, restate, rephrase or recapitulate the directive. Measure 1 only mentions repeating the directive.</p> <p>The RCSDT agrees that M2 needs to match the phrasing used in R2 and has made clarifying changes.</p>
<p>Response: See response above.</p>		
<p>Dominion</p>		<p>COM-001-2; M9 reads <i>“at least on a monthly basis”</i>, Dominion suggests that this be changed to <i>“at least once per calendar month”</i> as written in R2.</p> <p>The RCSDT agrees and the language in M9 has been changed to agree with the language in COM-001-2, R9.</p> <p>M8 Dominion suggests removing the second <i>“that”</i> in the first sentence of the measure.</p> <p>COM-001-2, M8: The RCSDT agrees and the language in M8 has been changed to delete the additional <i>“that.”</i></p> <p>M10 Dominion suggests this be revised to coincide with changes made in R10 (deleting impacted and adding as identified in Requirements R1 through R6),</p>

Organization	Yes or No	Question 6 Comment
		<p>therefore M10 should read:</p> <p><i>“Each Reliability Coordinator, Transmission Operator, and Balancing Authority, shall have and provide upon request evidence that it notified entities as identified in Requirements R1 through R6 within 60 minutes of the detection of a failure of its Interpersonal Communications capabilities that lasted 30 minutes or longer. Evidence could include, but is not limited to dated operator logs, dated voice recordings or dated transcripts of voice recordings, electronic communications, or equivalent evidence. (R10.)”</i></p> <p>The RCSDT thanks you for your comment and has made conforming changes to make change “impacted” to “identified” entities.</p> <p>M12 needs to be removed.</p> <p>The RCSDT appreciates your comment and has deleted Measure M12 that was left in error.</p> <p>IRO-001-3;</p> <p>R2 - Dominion questions the phrase “physically implemented” and recommends that the intent be clarified in the language.</p> <p>The RCSDT believes there may be conditions were an entity may not be able to physically implement the direction. For example, an entity that does not have the right to access certain equipment or cannot manually operate a broken apparatus. We feel the proposed language achieves the intended purpose. No change made.</p> <p>Dominion notes the following comment and response posted under Consideration of Comments on Initial Ballot - Reliability Coordination (Project 2006-06) Date of Initial Ballot: February 25 - March 7, 2011:”</p> <p><i>IRO-001 R2, R3, and R4 have replaced “Directives” with the word direction in lower case (while it appears that “Directives” is a subset of “directions”). We believe that this muddies the waters and could bring numerous conversations and dialog into scope unnecessarily. The end result is that the RC has the right to issue and use</i></p>

Organization	Yes or No	Question 6 Comment
		<p><i>“Directives” and anything short of this could just be communications. For example, a number of entities that are Reliability Coordinators also facilitate energy markets. There are many communications related to markets that probably should be out of scope with respect to the standards. Furthermore, it might not be clear what role (e.g., Reliability Coordinator, market operator, etc) the staff at these entities are fulfilling.</i></p> <p><i>Response: IRO-001 is written to cover both typical daily operating scenarios and also emergency scenarios. The required performance encompasses issuing and responding to Reliability Directives as well as other directions. The requirement language specifically ties back to Requirement R2 which states that the RC “shall take actions or direct actions, which could include issuing Reliability Directives.” This is the “direction in accordance with Requirement R2” stated in R3 and the “direction in accordance with Requirement R3” stated in R4.”Dominion believes the entity’s comments remain valid and the response provided by the SDT does not address all aspects of the concern.</i></p> <p>Dominion suggests that the language be changed to “Reliability Directive” consistent with COM-002.</p> <p>The word “direction” connects with the language in the R1 (act or direct). Reliability Directives is a subset of “direction.” No change made.</p> <p>M2 - need to add the following words “compliance with, physically, unless” which were included in R2, therefore M2 should read:</p> <p><i>“Each Transmission Operator, Balancing Authority, Generator Operator, Interchange Coordinator and Distribution Provider shall have and provide evidence which may include, but is not limited to dated operator logs, dated records, dated and time-stamped voice recordings or dated transcripts of voice recordings, electronic communications, or equivalent documentation, that will be used to determine that it complied with its Reliability Coordinator’s direction(s) per Requirement R1 unless compliance with the direction per Requirement R1 could not be physically</i></p>

Organization	Yes or No	Question 6 Comment
		<p><i>implemented or unless such actions would have violated safety, equipment, regulatory or statutory requirements. In such cases, the Transmission Operator, Balancing Authority, Generator Operator, Interchange Coordinator or Distribution Provider shall have and provide copies of the safety, equipment, regulatory or statutory requirements as evidence for not complying with the Reliability Coordinator’s direction. (R2)“</i></p> <p>The RCSDT thanks you for your comment and has added the word “physically” to the IRO-001-2 Measure M2.</p> <p>Section 1.3, the second bullet; need to add calendar to 12 calendar months</p> <p>The RCSDT appreciates your comments and conforming changes have been made to the Data Retention section.</p>
<p>Response: See response above.</p>		
<p>FirstEnergy</p>		<p>Definition of Interpersonal Communications.</p> <p>We understand that the team does not want to be prescriptive as far as the specific types of communication mediums since we live in an age of many forms of communication. But in this case it may be helpful to give examples in the definition. An auditor may interpret Interpersonal Communication to strictly include voice-related and two-way conversations. Depending on the circumstances, other mediums may be adequate, such as blast calls or instant messaging. This should be clarified in the definition.</p> <p>COM-001-2.</p> <p>In R9, it should be clear that the 2-hour timeframe is for initiation of corrective action because mitigation may take much longer. We suggest the last sentence of R9 state: “If the test is unsuccessful, the responsible entity shall, within 2 hours, initiate action to repair or designate a replacement Alternative Interpersonal Communications capability.</p>

Organization	Yes or No	Question 6 Comment
		<p>COM-001-2, R9: The requirement is to initiate repair or designate an Alternative Interpersonal Communication capability within two hours. The requirement is NOT to have the repair completed within two hours. The requirement recognizes that the entity may use its Alternative Interpersonal Communication capability now as its Interpersonal Communication capability, and then, if it decides to do so, designate another, if you may, “new” Alternative Interpersonal Communication capability. This is not required, but is an option that the entity can consider. The entity may already have a maintenance and repair agreement in place that will respond and repair the failed capability. No change made.</p> <p>In R10, the phrase “R1 through R6” should state “R1 through R8.”</p> <p>The RCSDT thanks you for your comment; alternatively, the RCSDT has modified the language of R10 to refer to R1, R3, and R5, rather than “R1 through R6,” since the responsible entities are limited to the RC, the TOP, and the BA in these requirements.</p> <p>COM-002-3</p> <p>In R2, the use of the term recapitulate may not be appropriate. This term means “to summarize” the directive. Three-part communication during emergency situations should assure that the essential details of the directives are understood and a summary may inadvertently leave out important information.</p> <p>The RCSDT carefully considered the use of the term “recapitulate,” and believes it correctly captures the intent. No change made.</p> <p>The effective date of COM-002-3 should be consistent with COM-001-2 and IRO-001-3 and state “the 1st calendar day of the 2nd calendar quarter.” It currently shows the “1st calendar quarter in the standard and implementation plan.</p> <p>The RCSDT thanks you for your comment and has made conforming changes to adjust IRO-001 to be the same as COM-001 and COM-002.</p> <p>IRO-001-3</p> <p>The third bullet under Data Retention addresses requirement R4 and measure M4</p>

Organization	Yes or No	Question 6 Comment
		<p>neither of which exist in the standard.</p> <p>The RCSDT thanks you for your comment and has made conforming changes.</p> <p>In R1, the word “and” is missing between Generator Operator and Distribution Provider.</p> <p>The RCSDT thanks you for your comment and has made conforming changes to IRO-001, R2.</p> <p>VSL for R2 - “N/A” should be removed from the High VSL - Furthermore, the VSL should include language for instances when the entity cannot meet the RC’s directive as afforded by R2.</p> <p>The RCSDT thanks you for your comment and has made conforming changes to IRO-001, R2 VSL.</p>
<p>Response: See response above.</p>		
<p>MISO Standards Collaborators</p>		<p>The Data Retention Section in IRO-001 does not reflect the revised requirements. For example: the Electric Reliability Organization is no longer a responsible entity; the Reliability Coordinator should replace the ERO for keeping data for R1; Transmission Operator, Balancing Authority, Generator Operator and Distribution Provider should replace the Reliability Coordinator for keeping data for R2; and there is no R4/M4.</p> <p>The RCSDT thanks you for your comment and has made conforming changes.</p> <p>Additional comments associated with COM-002</p> <p>We are concerned with the use of ‘shall’ in the measurement sections. ‘Shall’ statements should only be used in the Requirements, as these are the only enforceable items in the standard. The measures should not limit how we show compliance. If there are specific issues that the drafting team is proposing to be a requirement, they should be added to the requirements section of the standard.</p> <p>The RCSDT has checked the usage of “shall” in other standards and has found it to be</p>

Organization	Yes or No	Question 6 Comment
		<p>consistent with writing measures. The RCSDT notes the measures are examples and the entity is not limited to those examples. No change made.</p> <p>Measurement M1 should also allow entities to develop procedures that are distributed to and trained on in advance with recipients of directives that meet the requirements for the communication of what constitutes a Reliability Directive. The last sentence in the measurement should be revised to read:</p> <p><i>“Such evidence could include, but is not limited to, dated and time-stamped voice recordings, dated and time-stamped transcripts of voice recordings, or dated operator logs to show that it identified the action as a Reliability Directive to the recipient or approved procedures that identify what constitutes a Reliability Directive and when Reliability Directives are issued.”</i></p> <p>The RCSDT believes that M1 does not preclude an entity from developing, having or utilizing procedures as evidence to address Reliability Directives. No change made.</p> <p>(R1) The Data Retention section states; ‘For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit.’</p> <p>It is unclear on how an entity would be expected to provide evidence beyond 3 months when requested if the data retention period and established procedures do not require the evidence to be retained.</p> <p>The SDT should provide examples of what other types of evidence could be expected or the phrase should be removed.</p> <p>The RCSDT thanks you for your comments. The Data Retention language has been updated to be consistent with the Standards Drafting Guidelines.</p>
<p>Response: See response above.</p>		

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<p>Florida Municipal Power Agency</p>		<p>In the definition of Interpersonal Communication, the use of the word “medium” is ambiguous. Suggestions for alternatives: “system”, “channel.”</p> <p>The RCSDT deliberately stayed away from the use of primary and secondary mediums, and prefers to use communications capabilities. Further, the RCSDT has gone to great lengths to provide some flexibility for those DPs and GOPs with little or no impact on the reliability of the BES. FERC directed NERC to provide for this consideration. Therefore, we use the language as proposed in R11. Mutually agreeable implies that both parties are willing to accept the outcome. It doesn’t mean that a DP or GOP must comply with the wishes of its TOP or BA because as you state that could be beyond the control of the DP or GOP. But what transpires in the consultation is a realization of what the situation is, what the impacts to reliability are and a determination of what is amicable to both parties. No change made.</p> <p>COM-001-2, R1 and R3, the phrase:</p> <p>“have Interpersonal Communications capabilities”, what if the communication system fails? Is that an immediate non-compliance (especially R3.3 and R3.4 which do not require a redundant system).</p> <p>Suggest using EOP-008 type of language to allow restoration of failed equipment without non-compliance.</p> <p>The RCSDT reviewed both EOP-008-0 and EOP-008-1, which is subject to future enforcement. In either version, the team believes there is no need to add additional language to the standard.</p> <p>The RCSDT believes that prescribing a device or medium would limit an entity; therefore, “capability” is used to avoid being prescriptive and to provide flexibility. This was not intended by the drafting team. The intent is to give the entity the flexibility in meeting the requirement. A loss of Interpersonal Communication capability is covered by R10, notification of Interpersonal Communication capability failure. No change made.</p>

Organization	Yes or No	Question 6 Comment
		<p>COM-001-2, R9 - "Each ... shall test its Alternative Interpersonal Communications capability", suggest adding the phrase "to each entity for which Alternative Interpersonal Communications is required" to add clarity. In addition, the type of testing is unclear and ambiguous.</p> <p>The RCSDT proposes that R9 correctly identifies and provides clarity for the entities required to have Alternative Interpersonal Communication capability. No change made</p> <p>The is also ambiguity in the terms "direct", "directive", "direction" and "Reliability Directive." The SDT may want to consider using the terms "instruct" and "instruction" in place of "direct", "directive", "direction" to more clearly distinguish from a Reliability Directive.</p> <p>The RCSDT feels the use of "direct" and "directed" is consistent with the purpose and application of those terms in other standards. No change made.</p>
<p>Response: See response above.</p>		
<p>ACES Power Marketing Standards Collaborators</p>		<p>The following comments are regarding IRO-001-3.</p> <p>We disagree with including "authority" in this standard. FERC Order 693a, paragraph 112, made it clear that the authority of a registered entity is established through the approval of the standards by FERC. Thus, a Reliability Coordinator gets its authority to issue Reliability Directives by having a requirement that states it must issue Reliability Directives approved by the Commission. Please change "shall have authority to act" in Requirement R1 back to "shall act."</p> <p>Please also remove all other vestiges of authority from the standards including in the purpose, measures and VSLs.</p> <p>The RCSDT believes that other standards (i.e., IRO-009 - R3 & R4, EOP-002 - R1 & R8) address the action of others and if the term "authority" is omitted, creates a generic requirement such as what has been suggested puts the RC in a double jeopardy</p>

Organization	Yes or No	Question 6 Comment
		<p>situation. No change made.</p> <p>The word “direction” connects with the language in the R1 (act or direct). Reliability Directives is a subset of “direction.” No change made.</p> <p>Requirement R1 should require the use of Reliability Directives. The requirement compels the Reliability Coordinator “to direct others to act to prevent identified events or mitigate the magnitude or duration of actual events that result in an Emergency or Adverse Reliability Impact.” Reliability Directives are necessary to address Adverse Reliability Impacts or Emergencies and trigger the use of three-part communications identified in COM-002-3.</p> <p>The RCSDT views R1 as an authority requirement to direct others, which could include a subset of direction called, Reliability Directive. Requirement R2 is the response requirement for the recipient. The judgment the recipient is under is that the recipient must comply with the direction, unless the direction cannot be physically implemented or unless such actions would violate safety, equipment, regulatory or statutory requirements. Requirement R3 is simply requires the recipient to inform the issuer of its inability to perform the direction. No change made.</p> <p>COM-002-3 R1 really compels the Reliability Coordinator to use a Reliability Directive for Emergencies and Adverse Reliability Impacts with the opening clause:</p> <p>“When a Reliability Coordinator, Transmission Operator, or Balancing Authority determines actions need to be executed as a Reliability Directive.”</p> <p>What else could be more important for a Reliability Coordinator to issue a Reliability Directive than for an Emergency or Adverse Reliability Impact?</p> <p>Thus, not requiring the use of Reliability Directives for Adverse Reliability Impacts and Emergencies makes IRO-001-3 R1 and COM-002-3 R1 inconsistent. For clarity and consistency, Requirement R2 and R3 should also be clear that the responsible entities will respond to the Reliability Coordinator’s Reliability Directives.</p>

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		<p>Furthermore, this would make the standard consistent with how Reliability Directives are handled by the Transmission Operator in the draft TOP-001-2 standard proposed by the Real-Time Operations drafting team (Project 2007-03).</p> <p>The RCSDT development of IRO-001-3 R1 states “...which could include issuing Reliability Directives...” and therefore does not preclude its use if it is determined by the RC to use it. There may be instances where the RC discusses operational issues in normal dialogue with entities that do not require the use of Reliability Directive. No change made.</p> <p>The Data Retention section needs to be modified. The first bullet applies to the Electric Reliability Organization and Requirement R1 and Measure M1. The actual requirement and measure apply to the Reliability Coordinator. Furthermore, five calendar years exceeds the audit period of three years for a Reliability Coordinator.</p> <p>The RCSDT thanks you for your comment and has removed this bullet.</p> <p>The second bullet incorrectly applies to the Reliability Coordinator and Requirement R2 and Measure M2. Requirement R2 and Measurement M2 apply to Transmission Operators, Balancing Authorities, Generator Operators and Distribution Providers. The third bullet mentions Requirement R4 and Measurement M4.</p> <p>The RCSDT thanks you for your comment and has made conforming changes.</p> <p>There is no Requirement R4 and Measurement M4 in the standard.</p> <p>The RCSDT thanks you for your comment and has made conforming changes.</p> <p>The VSLs for Requirement R1 are not consistent with the requirement. The VSL states that it is for failure to act while the requirement compels the Reliability Coordinator to have the authority to act. This modifies the requirement which is not allowed under FERC VSL guidelines.</p> <p>The RCSDT thanks you for your comment and will correct the R1 VSL to have the phrase "exercise their authority" inserted between "to" and "take" in the first</p>

Organization	Yes or No	Question 6 Comment
		<p>sentence.</p> <p>The VSLs for Requirement R2 need to include the “unless” clause from the requirement. Otherwise, the VSL implies that the responsible entity violated the requirement for failing to follow the directive even if they could not for one of the reasons listed in the requirement. This again is not consistent with FERC guidelines that state VSLs cannot modify the requirement.</p> <p>The RCSDT did not include the “unless such actions would violate safety, equipment, regulatory or statutory requirements” portion of the requirement in the VSL because if an entity could not perform the directed action, there is no violation. No change made.</p> <p>The following comments pertain to COM-001-2.</p> <p>We recommend striking “capability” from all of the requirements. It is not clear to us how this helps when a definition for Interpersonal Communications is written already and applies to a communication medium. Furthermore, we think it causes confusion and actually contradicts the intent of the standard. Because Requirements R1, R3, R5, R7 and R8 focus on capability, the responsible entity will be in violation anytime its medium that it uses for the primary capability does not function properly. Whereas if the requirement stated that the responsible entity was to designate a primary communications medium, the responsible entity is not in violation if that medium is not functioning properly. It would be clear that Requirement R2, R4 and R6 are intended to be complementary.</p> <p>The RCSDT believes that prescribing a device or medium would limit an entity; therefore, “capability” is used to avoid being prescriptive and to provide flexibility. This was not intended by the drafting team. The intent is to give the entity the flexibility in meeting the requirement. A loss of Interpersonal Communication capability is covered by R10, notification of Interpersonal Communication capability failure. No change made.</p> <p>Furthermore, it is not clear why Requirements R1, R3, R5, R7 and R8 state that the</p>

Organization	Yes or No	Question 6 Comment
		<p>responsible entity shall “have” when the companion Requirements R2, R4, and R6 state “designate.”</p> <p>The RCSDT believes the requirements achieve the desired intent of the standard. Each entity listed must “have” an Interpersonal Communication capability and for Alternative Interpersonal Communication capability able to “designate” the alternate. The team established these requirements to provide flexibility to the industry. No change made.</p> <p>Since Requirement R10 deals with a failure of its Interpersonal Communications capabilities and not Alternate Interpersonal Communications capability, it should only refer to the entities in Requirements R1, R3, and R5. Currently, it includes R1 through R6.</p> <p>COM-001-2, R10: The RCSDT thanks you for pointing this out. The RCSDT has modified the language of R10 to refer to R1, R3, and R5, rather than “R1 through R6,” since the responsible entities are limited to the RC, the TOP, and the BA in these requirements.</p> <p>(COM-001 M1)</p> <p>We suggest changing “physical assets” to “demonstration of physical assets.” Since evidence is provided to the auditor and the auditor takes the evidence with them, providing them evidence that is a “physical asset” would be problematic. We believe that the VSLs could be written to provide more gradations. For example, if a Transmission Operator or Balancing Authority failed to have Interpersonal Communications capability with a Distribution Provider but had Interpersonal Communications capability with all other required entities, it has met the vast majority of the requirement. Since VSLs are a measure of how much the requirement was missed by the responsible entity, jumping to a Severe VSL does not seem to adequately capture that the responsible entity met the vast majority of the requirement. Requirements R4 and R6 even seem to recognize this by not including Distribution Provider in the list of entities to which the Transmission Operator or</p>

Organization	Yes or No	Question 6 Comment
		<p>Balancing Authority are required to designate Alternate Interpersonal Communications capability.</p> <p>The following comments pertain to COM-002-3.</p> <p>The RCSDT believes the Measures address the needed examples of evidence. No change made.</p> <p>While COM-002-3 is well written to explain the three-part communications requirements and makes it perfectly clear when Reliability Directive has been issued, the opening clause leaves the responsible entity open to second guessing on whether they should have issued a Reliability Directive. This problem could be solved by changing the opening clause to:</p> <p>“When a Reliability Coordinator, Transmission Operator, or Balancing Authority determines actions need to be executed as a Reliability Directive.” In the second bullet of Requirement R3, we suggest using “Restate” in place of “Reissue.”</p> <p>The responsible entity is not really reissuing the Reliability Directive. They are still in the act of trying to get the Reliability Directive issued and are simply re-communicating it because it was not understood.</p>
<p>Response: The RCSDT believe the offered suggestion does not improve COM-002-3, R1. No change made.</p>		
<p>Kansas City Power & Light</p>		<p>R9 - considering the reliability of communication systems and System Operator attention may be on more important operational concerns, a 2-hour response to a problem with the alternative means of communication is over sensitive. Allowing for sometime in an operating shift would be more in line, such as 8 hours.</p> <p>COM-001-2, R9: The requirement is to initiate repair or designate an Alternative Interpersonal Communication capability within two hours. The requirement is NOT to have the repair completed within two hours. The requirement recognizes that the entity may use its Alternative Interpersonal Communication capability now as its Interpersonal Communication capability, and then, if it decides to do so, designate</p>

Organization	Yes or No	Question 6 Comment
		<p>another, if you may, “new” Alternative Interpersonal Communication capability. This is not required, but is an option that the entity can consider. The entity may already have a maintenance and repair agreement in place that will respond and repair the failed capability. No change made.</p> <p>Violation Severity Levels for COM-001-2: The VSL’s for requirements R1-R8 and R11 do not recognize the efforts of Entities to meet the requirements. If an Entity failed to establish communications or alternative communications with 1 Entity out of 20 should that be Severe?</p> <p>The RCSDT believes the requirements are essential to reliable operations; however, the requirement is Severe more so because it is a pass-fail requirement, and by definition makes it Severe (binary requirement). No change made.</p> <p>Implementation Plan for COM-001-2: The implementation plan is too aggressive at completing in 6 months after regulatory approvals. Establishing agreements with other RC’s, TOP’s and BA’s for alternative “interpersonal communications” regarding the various types of communications available that meet these requirements will take more than 6 months. Recommend 12 months to allow Entities sufficient time to reach agreements and to establish the communications.</p> <p>The RCSDT believes that six months is adequate considering additional facilities should not have to be built to establish communications with the DP and GOP; similarly, compliance documentation should not impose significant work on the entities’ part. No change made.</p>
<p>Response: See response above.</p>		
Southern Company		<p>We question why the first paragraph of Section 1.3 - Data Retention has been included in each of these three standards. We suggest that it should be removed from each standard.</p> <p>The RCSDT thanks you for your comments. The Data Retention language has been</p>

Organization	Yes or No	Question 6 Comment
		<p>updated to be consistent with the Standards Drafting Guidelines.</p> <p>We suggest the drafting team look at Standard EOP-008, Requirements R3 and R8 and add appropriate language in Standard COM-001-2, to avoid instantaneous non-compliance for loss of Interpersonal Communications and/or alternate Interpersonal communications (R1 and R2).</p> <p>The RCSDT reviewed both EOP-008-0 and EOP-008-1, which is subject to future enforcement. In either version, the team believes there is no need to add additional language to the standard.</p> <p>The RCSDT believes that prescribing a device or medium would limit an entity; therefore, “capability” is used to avoid being prescriptive and to provide flexibility. This was not intended by the drafting team. The intent is to give the entity the flexibility in meeting the requirement. A loss of Interpersonal Communication capability is covered by R10, notification of Interpersonal Communication capability failure. No change made.</p> <p>COM-001-2 Dominion VP:</p> <p>COM-001-2; M9 reads “at least on a monthly basis”, Dominion suggests that this be changed to “at least once per calendar month” as written in R9. This change should also be corrected in the VSLs.</p> <p>The RCSDT agrees and the language in M9 has been changed to agree with the language in R9 and the R9 VSL.</p> <p>M8 - We suggest removing the second “that” in the first sentence of the measure.</p> <p>COM-001-2, M8: The RCSDT agrees and the language in M8 has been changed to delete the additional “that.”</p> <p>M10 - Dominion suggests this be revised to coincide with changes made in R10 (deleting impacted and adding as identified in Requirements R1 through R6), therefore M10 should read:</p>

Organization	Yes or No	Question 6 Comment
		<p>“Each Reliability Coordinator, Transmission Operator, and Balancing Authority, shall have and provide upon request evidence that it notified entities as identified in Requirements R1 through R6 within 60 minutes of the detection of a failure of its Interpersonal Communications capabilities that lasted 30 minutes or longer. Evidence could include, but is not limited to dated operator logs, dated voice recordings or dated transcripts of voice recordings, electronic communications, or equivalent evidence. (R10.)”</p> <p>The word “impacted” was removed in previous postings. For further clarification, the RCSDT has modified M10 to remove the word “impacted” to be consistent with R10. For additional clarity, the RCSDT also changed the phrase in R10 and M10, “R1 through R6” to “R1, R3, and R5,” to clarify that it applies to the capabilities with the RC, the TOP, and the BA.</p> <p>M12 needs to be removed.</p> <p>The RCSDT thanks you for your comment and has made the deletion.</p> <p>Southern: Definition of Alternative Interpersonal Communication: Any Interpersonal Communication that is able to serve as a substitute for, and does not utilize the same infrastructure (medium) as, Interpersonal Communications used for day-to-day operation.</p> <p>Comments:</p> <p>-The proposed definition uses the term “medium.”</p> <p>What is the scope of that?</p> <p>Telephony is a “medium” but there is wired, wireless, satellite, etc. Was “medium” intended to differentiate voice, paper, text, email, teletype, or something else?</p> <p>-Similar to that last question - does the qualifying term “same” when modifying infrastructure mean something like voice versus written?</p> <p>What about situations where the primary telephone system is Voice Over Internet</p>

Organization	Yes or No	Question 6 Comment
		<p>Protocol (VOIP) and it is using the same computer network infrastructure as an email or messaging system. That is the “same infrastructure” but a different “medium”</p> <p>R1 Each Reliability Coordinator shall have Interpersonal Communications capability with the following entities: ...”</p> <p>The RCSDT believes that prescribing a device or medium would limit an entity; therefore, “capability” is used to avoid being prescriptive and to provide flexibility. This was not intended by the drafting team. The intent is to give the entity the flexibility in meeting the requirement. A loss of Interpersonal Communication capability is covered by R10, notification of Interpersonal Communication capability failure. No change made.</p> <p>Comments</p> <p>-In later requirements it is proposed that the entity “...shall designate an...” It is suggested that for consistency and auditability, this concept be used for R1, R3, R5, R7 and R8.</p> <p>Each entity listed must “have” an Interpersonal Communication capability and for Alternative Interpersonal Communication capability able to “designate” the alternate. The team established these requirements to provide flexibility to the industry. No change made.</p> <p>In addition, the qualifier of “primary” should be used such that the requirements read “... shall have designated, primary Interpersonal Communications capability with the following entities:” Although it is appropriate that “Alternative” be capitalized since it is used in a defined term (i.e. Alternative Interpersonal Communication”) that bounds acceptable alternative methods , we do not see the need to capital “primary.”</p> <p>The RCSDT emphasizes the requirement refers only to Interpersonal Communication capabilities. Adding the phrase “to the primary” is not needed. Please refer to the definitions of Interpersonal Communication and Alternative Interpersonal Communication for clarification. No change made.</p>

Organization	Yes or No	Question 6 Comment
		<p>R9 Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall test its Alternative Interpersonal Communications capability at least once per calendar month.</p> <p>Comments</p> <ul style="list-style-type: none"> -The requirement is unclear if the required monthly test is a general functionality test or if there is the expectation of testing the designated Alternative Interpersonal Communications with all of the entities defined in the subrequirements of R2, R4, and R6. -There is no expectation of testing the primary Interpersonal Communications is this intentional or an oversight? <p>Although functional testing of this should be done as a normal course of business, should an explicit test be required with each entity in the subrequirements of R1, R3, R5, R7 and R8 to insure, for example, that all the phone numbers are correct?</p> <p>The RCSDT intends each Alternative Interpersonal Communication capability to be verified functional by testing. If an entity has only one such capability, then only one test would be required. You further ask whether the absence of required testing of the “primary” (word is not in the requirement) Interpersonal Communication capability is intentional. The RCSDT intentionally left it out because the Communication capability is used routinely and the use is sufficient to demonstrate functionality. With respect to phone numbers, these are procedural matters to be addressed by each individual entity and by including phone numbers it would make the requirement prescriptive. The requirement is to test capability. No change made.</p> <p>R10 Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall notify entities as identified in Requirements R1 through R6 within 60 minutes of the detection of a failure of its Interpersonal Communications capabilities that lasts 30 minutes or longer.</p>

Organization	Yes or No	Question 6 Comment
		<p>Comments</p> <p>-The following scenario seems plausible: The Interpersonal Communications fails and is detected at 14:00 and gets fixed at 14:35. It lasted more than 30 minutes but is fixed. As written the requirement would require the responsible entity to notify entities identified in R1 through R6 by 15:00 (i.e. 60 minutes from detection) even though the problem no longer exists. Is that the expectation?</p> <p>The RCSDT proposes that upon detection of failure that continues at least 30 minutes, starts the 60-minute clock. The 30 minutes allows an entity time to restore or determine if it can restore its Interpersonal Communication capability before the clock starts. No change made.</p> <p>General Question</p> <p>-Does COM-001 apply only to primary control centers or back-ups, per EOP-008, as well?</p> <p>The RCSDT reviewed both EOP-008-0 and EOP-008-1, which is subject to future enforcement. In either version, the team believes there is no need to add additional language to the standard. No change made.</p> <p>COM-002-3 Southern</p> <p>R1. When a Reliability Coordinator, Transmission Operator or Balancing Authority requires actions to be executed as a Reliability Directive, the Reliability Coordinator, Transmission Operator or Balancing Authority shall identify the action as a Reliability Directive to the recipient.</p> <p>Comment</p> <p>It is recommended that the requirement be clarified that the Reliability Directive be identified as such during its delivery. (e.g., "...shall identify the action as a Reliability Directive to the recipient during its delivery.")</p> <p>The RCSDT believes the suggestion is overly prescriptive and limits the ability for an</p>

Organization	Yes or No	Question 6 Comment
		<p>entity to meet the requirement. No change made.</p> <p>R2 Each Balancing Authority, Transmission Operator, Generator Operator, and Distribution Provider that is the recipient of a Reliability Directive shall repeat, restate, rephrase or recapitulate the Reliability Directive.</p> <p>Comment</p> <p>-It is recommended that the requirement be clarified that an entity receiving a Reliability Directive repeat, restate, rephrase or recapitulate it immediately upon receiving it. (e.g., "...shall repeat, restate, rephrase or recapitulate the Reliability Directive immediately upon receiving it."). As written, there is not limit as to when the entity must repeat it (i.e. they could wait 2 hours).</p> <p>The proposed requirement uses the term "upon recognition." No change made.</p> <p>General Question</p> <p>-The Standard is not clear as to what each entity is to do when more than one entity receives a Reliability Directive at the same time (e.g. during a RC area teleconference call) . Is, for example, a roll call of receiving entities expected to be held so that they individually can repeat, restate, rephrase or recapitulate the Reliability Directive followed by individual confirmation required in R3?</p> <p>The question about whether a roll call of receiving entities is expected to be held is asking for prescription of "how" to accomplish what is required. The RCSDT recognizes that there is more than one way to accomplish the confirmation when more than one entity received a Reliability Directive at the same time. What is required is for the recipient to respond in such a way that the issuer may determine whether the message has been properly understood. One way for that to occur would be, as you suggest, for the entities to individually respond. Another way would be for a pre-established protocol or procedure (e.g. roll-call, all-call, etc.) to be in place and used in such cases. The RCSDT has determined that prescribing "how" to ensure that "what" is required has been accomplished is not required and that the individually adopted procedures or protocols could offer many different ways to</p>

Organization	Yes or No	Question 6 Comment
		<p>ensure effectiveness. No change made. The RCSDT concept is that “All Call” compliance is related to having a document that explains how the entity responds. No change made.</p> <p>IRO-001-3 Dominion VP:</p> <p>R2 - Dominion questions the phrase “physically implemented” and recommends that the intent be clarified in the language.</p> <p>The RCSDT believes there may be conditions where an entity may not be able to physically implement the direction; for example, an entity that does not have the right to access certain equipment or cannot manually operate a broken apparatus. We feel the proposed language achieves the intended purpose. No change made.</p> <p>Dominion notes the following comment and response posted under Consideration of Comments on Initial Ballot - Reliability Coordination (Project 2006-06) Date of Initial Ballot: February 25 - March 7, 2011:</p> <p><i>“IRO-001 R2, R3, and R4 have replaced “Directives” with the word direction in lower case (while it appears that “Directives” is a subset of “directions”). We believe that this muddies the waters and could bring numerous conversations and dialog into scope unnecessarily. The end result is that the RC has the right to issue and use “Directives” and anything short of this could just be communications. For example, a number of entities that are Reliability Coordinators also facilitate energy markets. There are many communications related to markets that probably should be out of scope with respect to the standards. Furthermore, it might not be clear what role (e.g., Reliability Coordinator, market operator, etc) the staff at these entities are fulfilling.</i></p> <p><i>Response: IRO-001 is written to cover both typical daily operating scenarios and also emergency scenarios. The required performance encompasses issuing and responding to Reliability Directives as well as other directions. The requirement language specifically ties back to Requirement R2 which states that the RC “shall take actions or direct actions, which could include issuing Reliability Directives.” This is the</i></p>

Organization	Yes or No	Question 6 Comment
		<p><i>“direction in accordance with Requirement R2” stated in R3 and the “direction in accordance with Requirement R3” stated in R4.”Dominion believes the entity’s comments remain valid and the response provided by the RCSDT does not address all aspects of the concern. Dominion suggests that the language be changed to “Reliability Directive” consistent with COM-002.</i></p> <p>The word “direction” connects with the language in the R1 (act or direct). Reliability Directives is a subset of “direction.” No change made.</p> <p>M2 - need to add the following words “compliance with, physically, unless” which were included in R2, therefore M2 should read:</p> <p><i>“Each Transmission Operator, Balancing Authority, Generator Operator, Interchange Coordinator and Distribution Provider shall have and provide evidence which may include, but is not limited to dated operator logs, dated records, dated and time-stamped voice recordings or dated transcripts of voice recordings, electronic communications, or equivalent documentation, that will be used to determine that it complied with its Reliability Coordinator’s direction(s) per Requirement R1 unless compliance with the direction per Requirement R1 could not be physically implemented or unless such actions would have violated safety, equipment, regulatory or statutory requirements. In such cases, the Transmission Operator, Balancing Authority, Generator Operator, Interchange Coordinator or Distribution Provider shall have and provide copies of the safety, equipment, regulatory or statutory requirements as evidence for not complying with the Reliability Coordinator’s direction.”</i></p> <p>The RCSDT thanks you for your comment and has added the word “physically” to the IRO-001-2 Measure, M2.</p> <p>(R2) “Section 1.3, the second bullet; need to add calendar to 12 calendar months Southern General recommendation</p> <p>The RCSDT appreciates your comments and conforming changes have been made to the Data Retention section.</p>

Organization	Yes or No	Question 6 Comment
		<p>-It is recommended that where the verb “direct/directed” or noun “direction” is used in Purpose, R1, R2 and R3, that it be replaced with the verb “instruct/instructed” or noun “instruction”, as appropriate. This would help the industry avoid confusion often referred to as “big D” or “little d” directives. It is noted that the term “Reliability Directive” does that to a great degree but avoiding the verb/noun “direct/direction” would augment the difference.</p> <p>The RCSDT feels the use of direct and directed is consistent with the purpose and application of those terms in other standards. No change made.</p> <p>R1 Each Reliability Coordinator shall have the authority to act or direct others to act (which could include issuing Reliability Directives) to prevent identified events or mitigate the magnitude or duration of actual events that result in an Emergency or Adverse Reliability Impacts.</p> <p>Comment</p> <p>-At what point in time is “identified” referring to in “...to prevent identified events or...” Is it referring to current or future events? One might assume both since the “Time Horizon” is defined as Real-time Operations, Same Day Operations and Operations Planning but the requirement may be enhanced if explicitly stated (“...to prevent events identified in real-time or in the future or to mitigate the magnitude...”).</p> <p>The context of “identified” is when a set of system conditions is recognized that could lead to an Emergency or Adverse Reliability Impact, which may require action. See standards IRO-008 and IRO-009. No change made.</p> <p>-For clarity, the scope of the authority should be limited to the Reliability Coordinator Area (“...that result in an Emergency or Adverse Reliability Impacts within its Reliability Coordinator Area”). As written, it implies the authority should extend outside its RC Area.</p> <p>The RCSDT believes that limiting the scope to the RC’s area would be too limiting and not account for potential conditions where an adjacent RC may have lost its wide-</p>

Organization	Yes or No	Question 6 Comment
		<p>area view and requests the assistance of another RC or vice-versa. No change made.</p> <p>R2 Editorial comment - The words “compliance with” are in a different font in the posted version.</p> <p>The RCSDT thanks you for your comment and has corrected the font in IRO-001, R2.</p> <p>R3 Each Transmission Operator, Balancing Authority, Generator Operator, and Distribution Provider shall inform its Reliability Coordinator upon recognition of its inability to perform as directed in accordance with Requirement R2.</p> <p>Comment</p> <p>The requirement states the responsible entities shall “inform” its RC when unable to perform as directed but it is unclear when the notification needs to take place. Although the term “as soon as practical” may seem be un-measurable, as written now there is no time deadline to perform the notification - i.e. it could be 4 hours later after recognition.</p> <p>The proposed requirement uses the term “upon recognition.” No change made.</p>
<p>Response: See response above.</p>		
Central Lincoln		<p>As stated in our prior comments, we continue to have problems with COM-002, R2 and R3 as written. The SDT’s answer (“It is the expectation that an issuer of a Reliability Directive would request a return call by the Distribution Provider operating personnel, then issue the Reliability Directive”) addresses our concern perfectly, and we would agree with such an expectation. Unfortunately, the expressed expectation is not in the proposed standard or even in a proposed guideline for the standard.</p>
<p>Response: The RCSDT believes this is a process or procedure question that should be determined by the entity in how it handles communication with the RC. The standard, as written does, not preclude the entity from having a procedure. No change made.</p>		

Organization	Yes or No	Question 6 Comment
<p>Entergy Services, Inc</p>		<p>Entergy does not agree with including the DP and GOP in this standard. However, if they are to be included and are required to have the communications capability indicated, they should be included in R10. Why would it be important for the TOP to notify the DP that their communications method has failed, but it is not important for the DP to notify the TOP when their communications method has failed? The distinction doesn't seem reasonable or meaningful.</p> <p>The RCSDT stresses that R11 grants the DP and GOP flexibility in determining, in conjunction with its TOP or BA, when its Interpersonal Communication capability must be restored. This would provide allowances for those entities, which have little or no impact on the reliability of the BES while not requiring them to obtain Alternative Interpersonal Communication capabilities. Making the proposed changes would eliminate this flexibility. Removing R11, takes away the RCSDT's effort to include those provisions in the standard. No change made.</p> <p>Additionally, in the draft of COM-002-3 requirement 2 contains the language that the recipient of the directive shall "repeat, restate, rephrase or recapitulate" the directive. Why are so many synonyms of repeat necessary? Repeat or restate should be sufficient to get the point across.</p> <p>The RCSDT used the additional words to facilitate complete understanding. No change.</p>
<p>Response: See response above.</p>		
<p>Independent Electricity System Operator</p>		<p>(1) The proposed implementation plan conflicts with Ontario regulatory practice respecting the effective date of the standard. It is suggested that this conflict be removed by appending to the implementation plan wording, after "applicable regulatory approval" in the Effective Dates Section A5 on P. 4 of the draft standard COM-001, COM-002 and IRO-001, and on P. 2 of COM-001's Implementation Plan and P. 1 of COM-002's and IRO-001's Implementation Plans, to the following effect:", or as otherwise made effective pursuant to the laws applicable to such ERO</p>

Organization	Yes or No	Question 6 Comment
		<p>governmental authorities.”</p> <p>The RCSDT is uncertain where the conflict exists. The standard IRO-001 uses the term “after applicable” and the others “following applicable.” The RCSDT has updated the standards to use the most current effective date language.</p> <p>(2) COM-001: Measure M9: - “monthly basis.” Suggest changing “monthly basis” to “at least once per calendar month” to be consistent the wording in R9.</p> <p>The RCSDT thanks you for your comment and has made the conforming change in the COM-001, Measure M9.</p> <p>(3) IRO-001: Measures M1, M2, M3 - The types of evidence are listed in paragraph form. This is not consistent with presentation style in COM-001-2 Measures, where evidence is listed in bullet format. Suggest using bullet form for consistency.</p> <p>The RCSDT agrees and has made all the Measures bullet form in COM-001-2, but not in COM-002-3 and IRO-001-3.</p> <p>(4) IRO-001, Data Retention Section:</p> <p>i. The retention requirements do not reflect the revised requirements. For example: the Electric Reliability Organization is no longer a responsible entity; the Reliability Coordinator should replace the ERO for keeping data for R1; Transmission Operator, Balancing Authority, Generator Operator and Distribution Provider should replace the Reliability Coordinator for keeping data for R2; and there is no R4/M4.</p> <p>Data retention related to IRO-001-2, R2/M2 was changed to agree with your suggestion. The changes were more involved – several sections were changed, including removing the reference to R4/M4.</p> <p>ii. Section 1.3, second paragraph: “The Reliability Coordinator, Transmission Operator, Balancing Authority, Generator Operator, or Distribution Provider... shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of</p>

Organization	Yes or No	Question 6 Comment
		<p>time as part of an investigation:</p> <p>"The word "or" between Generator Operator and Distribution Provider should be changed to "and."</p> <p>The RCSDT thanks you for your comment and has made conforming changes.</p>
<p>Response: See response above.</p>		
<p>Hydro-Quebec TransEnergie</p>		<p>For COM-001:</p> <p>R1.2 and R2.2: The phrase "within the same Interconnection" is improper; it needs to be removed. RCs between two Interconnections still need to communicate with each other for reliability coordination (e.g. between Quebec and the other RCs in the NPCC region to coordinate reliability issues including curtailing interchange transactions crossing an Interconnection boundary). The SDT's response to industry comments on the previous posting that the phrase was added to address the ERCOT situation (that ERCOT does not need to communicate with other RCs and that such coordination takes place between TOPs) leaves a reliability gap.</p> <p>Requirement R1 addresses a reliability need for adjacent Reliability Coordinators synchronously connected within the same Interconnection to have Interpersonal Communication capability; however, it does not preclude or limit the Reliability Coordinator from establishing Interpersonal Communication capability with others. The RCSDT does not see where there is a need to communicate with other Reliability Coordinator's from one interconnection to another. No change made.</p> <p>2. R3.5 and R4.3: The phrase "synchronously connected within the same Interconnection" is also improper; it needs to be removed. TOPs do communicate with other TOPs including those asynchronously connected and in another Interconnection (e.g. between Quebec and all of its asynchronously interconnected neighbors). The reason that was used in response to the above comments (coordination among TOPs for DC tie operation) contradicts with the inclusion of this</p>

Organization	Yes or No	Question 6 Comment
		<p>phrase in R3.5 and R4.3.</p> <p>The RCSDT has made clarifying changes by adding a Part to R3 and R4 to address asynchronous connections between Transmission Operators and have eliminated the phrase “within the same interconnection.”</p> <p>3. R4 and R6: Not requiring an Alternative Interpersonal Communication capability between the BAs and the DP and GOP can result in a reliability gap. If Interpersonal Communication capability between the BAs and these entities is required to begin with to enable BAs to communicate with these entities (such as operating instructions or Reliability Directives) to ensure reliable operations, then an alternative capability is also needed to ensure this objective is achieved when the primary capability fails.</p> <p>The RCSDT refers the Order No. 693 in Paragraph 508 to clarify the reason the DP and GOP are not required to have Alternative Interpersonal Communication and is as follows: “(1) expands the applicability to include Generator Operators and Distribution Providers and includes Requirements for their telecommunications facilities; (2) identifies specific requirements for telecommunications facilities for use in normal and emergency conditions that reflect the roles of the applicable entities and their impact on Reliable Operation and (3) includes adequate flexibility for compliance with the Reliability Standard, adoption of new technologies and cost-effective solutions.” In addition, R11 requires the DP and GOP to consult with its BA and TOP to determine a mutually agreeable action for restoration. No change made.</p> <p>4. To preclude the possibility of problems arising from having different languages spoken between entities, COM-001-1.1 R4 should remain as it was or those ideas kept in the revised requirement. R4 read: “R4. Unless agreed to otherwise, each Reliability Coordinator, Transmission Operator, and Balancing Authority shall use English as the language for all communications between and among operating personnel responsible for the real-time generation control and operation of the interconnected Bulk Electric System. Transmission Operators and Balancing Authorities may use an alternate language for internal operations.” 5. Measure M3</p>

Organization	Yes or No	Question 6 Comment
		<p>does not cover the added R3.5 condition (having Interpersonal Communications capability with each adjacent TOP). M3 needs to be revised.</p> <p>According to the proposed implementation plan for COM-001-2, R4 pertaining to the use of English will remain in effect upon the effective date of COM-001-3. This requirement is being revised and will be included in Standard COM-003-1, Operating Personnel Communications Protocols. COM-001-1.1, R4 will be retired at midnight the day before COM-003-1 becomes effective. No change made.</p> <p>For IRO-001:</p> <p>The Data Retention Section does not reflect the revised requirements. As examples: the Electric Reliability Organization is no longer a responsible entity; the Reliability Coordinator should replace the ERO for keeping data for R1.</p> <p>The RCSDT thanks you for your comment and has made conforming changes to the Data Retention section.</p> <p>Transmission Operator, Balancing Authority, Generator Operator and Distribution Provider should replace the Reliability Coordinator for keeping data for R2.</p> <p>The RCSDT has made conforming changes by correcting an error in the data retention section</p> <p>And, in the Data Retention Section, R4 and M4 are mentioned. However, there are only three requirements with their corresponding measures in the standard.</p> <p>The RCSDT has made conforming changes by correcting an error in the data retention section</p>
<p>Response: See response above.</p>		
<p>NIPSCO</p>		<p>In IRO-001 R2 an "and" is missing after Generator Operator, and the comma should be removed.</p> <p>Why are there 3 different Effective Dates for this project, each standard being</p>

Organization	Yes or No	Question 6 Comment
		different? To simplify, can't they all be made identical?
<p>Response: The RCSDT thanks you for your comment and has made conforming changes to IRO-001 R2 and the effective dates to the second quarter after regulatory approval.</p>		
<p>Oncor Electric Delivery Company LLC</p>		<p>For COM-001-2</p> <p>Oncor takes the position that contacting all impacted entities within 60 minutes of the detection of a failure of its Interpersonal Communications capabilities that lasts 30 minutes or longer as prescribed in R1 through R6 is not doable within the ERCOT interconnect for a Transmission Operator.</p> <p>Oncor takes the position that notification only to the RC and BA is sufficient and that those two entities have the operational functionality to contact within the prescribed time all affected Distribution Providers, Generator Operators, and other Transmission Operators.</p> <p>The RCSDT proposes that upon detection of failure that continues at least 30 minutes, starts the 60-minute clock. The 30 minutes allows an entity time to restore or determine if they can restore Interpersonal Communication capability before the clock starts. No change made.</p> <p>R10 - Oncor takes the position that the word “impacted” added to R10 will clarify that notification only needs to be made to the entities that are effected by the failure of a communication path. This will also more align with the language in M10.</p> <p>The word “impacted” was removed in previous postings. For further clarification, the RCSDT has modified M10 to remove the word “impacted” to be consistent with R10. For additional clarity, the RCSDT also changed the phrase in R10 and M10, “R1 through R6” to “R1, R3, and R5,” to clarify that it applies to the capabilities with the RC, the TOP, and the BA.</p> <p>For COM-002-3</p> <p>Oncor request clarity about what constitutes a “recipient.” For example, if a</p>

Organization	Yes or No	Question 6 Comment
		<p>Transmission Grid Operator performing the functions of a Transmission Operator issues a Reliability Directive to its own field operations personnel to perform an action on behalf of the same entity, does the field operations personnel as the recipient become in affect a “Transmission Operator” subject to R2?</p> <p>The term “recipient” in this case is referring to Functional entity to Functional entity communication. No change made.</p>
<p>Response: See response above.</p>		
<p>Consolidated Edison Co. of NY, Inc.</p>		<p>Regarding COM-002 Requirement R1, we recommend that this requirement be reworded as follows: “When a Reliability Coordinator, Transmission Operator or Balancing Authority requires actions to be executed as a Reliability Directive, the Reliability Coordinator, Transmission Operator or Balancing Authority shall require that the Reliability Directive be communicated using three-part communications as described in Requirements R2 and R3 of this standard.”</p> <p>The reason for this recommended rewording are threefold:</p> <ol style="list-style-type: none"> 1. Good operating practice calls for use of three-part communications at all times. The recommended re-write encourages the use of the good operating practice of three-part communications at all times, but does not require it. 2. It is not good operating practice to require that an additional (unnecessary) phrase be used during emergency situations. During emergency situations, it is best to use standard operating protocols so as to limit unnecessary burdens on operating personnel during critical and stressful times. 3. By implementing the proposed new R1 requirement, it would effectively weaken the need for rigorous compliance with any and all directives issued by the RC’s, TO’s or BA’s. <p>The RCSDT respectfully disagrees, the recipient needs clarity when a Reliability Directive is communicated. No change made.</p>

Organization	Yes or No	Question 6 Comment
		<p>Regarding IRO-001 Requirement R1, we recommend that the current requirement R3 be reinstated as the new requirement R1. That is, the new requirement R1 should read as follows: R1. The Reliability Coordinator shall have clear decision-making authority to act and to direct actions to be taken by Transmission Operators, Balancing Authorities, Generator Operators, Transmission Service Providers, Load-Serving Entities, and Purchasing-Selling Entities within its Reliability Coordinator Area to preserve the integrity and reliability of the Bulk Electric System. These actions shall be taken without delay, but no longer than 30 minutes.</p> <p>We do not support any further dilution of Reliability Coordinator authority to enforce Reliability Directives through deletion of the 30-minute maximum response time period. The timely actions in response to any Reliability Coordinator issued Reliability Directives is an essential part of the process.</p> <p>The RCSDT believe these concerns are addressed in other performance-based standards (IRO-008 and IRO-009) that require action and contain timing requirement when addressing IROs. The omission of TSP, LSE, and PSE does not diminish reliability and brings the standard into conformity with COM-001 and COM-002. No change made.</p>
<p>Response: See response above.</p>		
<p>We Energies</p>		<p>COM-001, Although a great improvement over existing COM-001, and eliminates the data component see comments:</p> <ul style="list-style-type: none"> -For R5.1 Can the solutions included to meet R1 be included, same R3.2 and R5.2, same R5.3 and R7.2, same R5.4 and R8.1 -For R5.2 Can the solutions included to meet R2 be included, same R4.2 and R6.2 <p>COM-001-2, R5: In a word: Yes. The requirement is to have capability and that capability does not have to be different than the entity on the other end has. No change made.</p>

Organization	Yes or No	Question 6 Comment
		<p>-R9 a 2 hour response for a once a month test seems extreme, as would require a secondary Alternate Interpersonal Communications capability</p> <p>-M9 is reasonable, but should include something about communication actual repair and or time estimates</p> <p>COM-001-2, R9: The requirement is to “initiate action to repair or designate a replacement Alternative Interpersonal Communication capability...” within two hours. The RCSDT recognizes that many different contracts or other arrangements may exist to address repair. However, the RCSDT finds that entities should know what they have and how to initiate repair and those two hours to do so is reasonable. No change made.</p> <p>COM-001-2, M9: The requirement is to have evidence that either repair was initiated or an Alternative Interpersonal Communication capability was designated within two hours. The RCSDT understands that, in extreme cases, the entity may need to make its initial Alternative Interpersonal Communication capability its Interpersonal Communication capability and then designate another Alternative Interpersonal Communication capability if the repair times are so long that to continue in that mode for that long would present a reliability risk. Such arrangements, if they exist at all, are very rare. No change made.</p> <p>-R10 The use of R1 through R6 implies notification of both Interpersonal Communications and Alternate Interpersonal Communications failures. Do you notify if you become aware after the link is back up if it was down for GT 30 minutes, and Doesn’t address notifying when restored?</p> <p>COM-001-2, R10: The RCSDT thanks you for pointing this out. The RCSDT has modified the language of R10 to refer to R1, R3, and R5, rather than “R1 through R6,” since the responsible entities are limited to the RC, the TOP, and the BA in these requirements.</p> <p>Yes, there is no requirement to notify identified entities the Interpersonal Communication have been restored.</p>

Organization	Yes or No	Question 6 Comment
		<p>-R11 Implies that R8 and R9 are independent and redundant to R5.3, R5.4 and R3.3 and R3.4.</p> <p>COM-001-2, R11: The RCSDT believes you intended to refer to R7 and R8, rather than R8 and R9. The RCSDT does not believe that the language implies that the communications capability required by R7 and R8 are independent, but they may be. If the entity which is registered as a DP is also registered as a GOP (probably unlikely), then the capability could be met by the same medium. Neither does the RCSDT believe that R11 implies that R7 and R8 are redundant to R3.3 and R3.4 or to R5.3 and R5.4. No change made.</p> <p>R11 is not clear on the purpose of the statement “determine a mutually agreeable time for restoration” this could be driven by forces outside the control any of the entities. I think” provide estimated restoration and actual restoration time and determine mutually agreeable alternative during outage” would be better.</p> <p>The RCSDT notes that R11 does not limit the sources of information used by the DP or GOP in establishing a mutually agreeable action for restoration of its Interpersonal Communication capability with its TOP or BA. That is precisely why R11 is written in this manner. This allows flexibility on the part of the TOP and BA in determining when the Interpersonal Communication capability must be restored. In situations where there is little or no impact to the reliability of the BES, some flexibility could be allowed without requiring the acquisition of Alternative Interpersonal Communication capability. No change made.</p> <p>Update M9 accordingly</p> <p>See comment above concerning R9.</p> <p>COM-002</p> <p>-Since all the Requirements are related to Reliability Directives, is it implied that all “Emergency Communications” are Reliability Directives even if not designated as such per R1.</p>

Organization	Yes or No	Question 6 Comment
		<p>The RCSDT would like to highlight that communications is not a defined term in the NERC Glossary of Terms used in Reliability Standards ,nor is it defined in this standard. Thus, the plain meaning of communications is intended. The RCSDT has not implied a defined term in the wording of the purpose statement of the standard, nor in the Requirements themselves, that any communication is a Reliability Directive unless the issuing functional entity identifies the actions to be taken as a Reliability Directive. Therefore, not all communications during Emergencies will be Reliability Directives. No change made.</p> <p>COM-002, R2: The RCSDT included some examples of how to provide the evidence needed for Measure M2. The examples are not intended to be an all-inclusive list. The RCSDT does point out, though, that dated operator logs could provide such evidence. The RCSDT does not believe that the recipient has the alternative to refuse to perform as required. However, the RCSDT does bring attention to standard IRO-001-3, which requires entities to comply with directions unless compliance with the direction cannot be physically implemented or unless such actions would violate safety, equipment, regulatory, or statutory requirements. No change made.</p> <p>-The M2 measure could be difficult for a recipient such as a Distribution Provider or Generator Operator. A recipient’s phone may not be recorded but an initiator’s always should. If a receiver refused to meet the R2 requirement, an initiator should have an alternative. i.e., repeat the directive and provide potential penalties if recipient refuses to comply. Should the initiator have responsibility for providing the entire 3-way evidence as M3 implies?</p> <p>The RCSDT would like to highlight that communications is not a defined term in the NERC Glossary of Terms used in Reliability Standards nor is it defined in this standard. Thus, the plain meaning of communications is intended. The RCSDT has not implied a defined term in the wording of the purpose statement of the standard, nor in the Requirements themselves, that any communication is a Reliability Directive unless the issuing functional entity identifies the actions to be taken as a Reliability Directive. Therefore, not all communications during Emergencies will be</p>

Organization	Yes or No	Question 6 Comment
		<p>Reliability Directives. No change made.</p> <p>COM-002 M3: The Measure is correct as written. The issuer only needs the evidence that it confirmed the response was accurate or reissued according to the requirement. Evidence does not necessarily mean the entity must have the entire three-way conversation captured (i.e., recording), but evidence the entity confirmed or reissued according to requirement. No change made.</p> <p>IRO-001</p> <p>Although a great improvement over existing IRO-001, see comments:</p> <ul style="list-style-type: none"> -R2 needs to be clear that it is the Reliability Coordinator’s Reliability Directive that must be complied with not just any Reliability Coordinator’s direction as stated. -The M2 measure could be difficult, as the operator would have to have access to documents proving the safety, equipment, regulatory or statutory requirements, which may be the assessment of an individual applying the safety rule. <p>Is the measure requiring a deposition of the individual to be performed for each instance?</p> <p>The RCSDT notes that the intent of the standard is not intended to limit the RC authority to issue Reliability Directives. The Reliability Coordinator issuing the Reliability Directive is the one, which the recipient must comply. It is assumed that a BA or TOP has a relationship with one and only one RC for a given Balancing Area or Transmission Operator Area (some may have multiple, disconnected areas, that are subject to different RCs). Still need a way to communicate to mutually agree. No change made.</p> <p>With an assumed data retention of 90 day (voice) or 12 month document retention the deposition would be unlikely to be acquired prior to the retention period ending.</p> <p>Data retention is a significant issue when the data being recorded is voluminous, supporting a 90-day retention period. No change made.</p>

Organization	Yes or No	Question 6 Comment
		<p>-R3 needs to be clear that it is the inability to perform the Reliability Coordinator’s Reliability Directive that must be communicated not just any “Reliability Coordinator’s as directed.”</p> <p>The RCSDT believes there is a misunderstanding about IRO-001, R3. The requirement specifically says “direction” and is in alignment with Requirement R1. Please note a Reliability Directive is a subset of “direction” that the RC may perform in accordance with R1. No change made.</p> <p>-The Data Retention section does not align with the standard:</p> <p>The Reliability Coordinator shall retain its evidence for the most recent 90 calendar days for voice recordings or 12 months for documentation for Requirement R2, Measure M2.</p> <p>The RCSDT thanks you for your comment. The RC has been removed from the measure and replaced with the corresponding R2 responsible entities (BA, DP, GOP, and TOP).</p> <p>R2 and M2 apply to the Transmission Operator, Balancing Authority, Generator Operator, or Distribution Provider.</p> <p>There is no R4 and M4.</p> <p>The RCSDT thanks you for your comment and has made conforming changes.</p>
<p>Response: See response above.</p>		
<p>City of Jacksonville Beach dba/ Beaches Energy Services</p>		<p>COM-001-2, R9 - "Each ... shall test its Alternative Interpersonal Communications capability." I would suggest adding the phrase "...to each entity for which Alternative Interpersonal Communications is required." to add clarity.</p>
<p>Response: The RCSDT proposes that R9 correctly identifies and provides clarity for the entities required to have Alternative Interpersonal Communication capability. No change made.</p>		

Organization	Yes or No	Question 6 Comment
<p>Indiana Municipal Power Agency</p>		<p>For R2 in IRO-001-3, the requirement needs to have the entities comply with their Reliability Coordinator’s direction received in R1. Currently, requirement 2 directions are not linked back to R1 which means entities would have to comply with all Reliability Coordinator’s directions regardless if they are associated with R1.</p> <p>The RCSDT agrees with your comment and believes the requirements does not need a linkage. No change made.</p> <p>For R7 in COM-001-2, IMPA does not believe that every Distribution Provider needs to be included in requirement 7. IMPA recommends stating that requirement 7 only applies to Distribution Providers who own an UFLS or UFLS system.</p> <p>The expectation is that a Distribution Provider that is registered with NERC is obligated to comply. No change made.</p>
<p>Response: See response above.</p>		
<p>Luminant Energy Company LLC</p>		<p>IRO-001-3 R1 is not consistent with the direction taken in COM-002-3 which requires the Reliability Coordinator to identify Reliability Directive as such. The same approach should be taken with IRO-001-3 R1 so that the Reliability Coordinator is required to identify directions that are made to prevent identified events or mitigate the magnitude or duration of actual events that result in an Emergency or Adverse Reliability Impacts as such prior to or when issuing the directions. This extra specification is needed to eliminate any possible confusion in areas where the market operator and Reliability Coordinator are the same entity. In these areas, the Reliability Coordinator/market operator routinely gives directions to other entities that are not to prevent identified events or mitigate the magnitude or duration of actual events that result in an Emergency or Adverse Reliability Impacts. Without the added clarification the receiving entity may not know the urgency of the situation and may not know to inform the Reliability Coordinator if they are unable to perform as required by R3.</p>

Organization	Yes or No	Question 6 Comment
<p>Response: The RCSDT views R1 as an authority requirement to direct others, which could include a subset of direction called Reliability Directive. Requirement R2 is the response requirement for the recipient. The judgment the recipient is under is that the recipient must comply with the direction, unless the direction cannot be physically implemented or unless such actions would violate safety, equipment, regulatory or statutory requirements. Requirement R3 simply requires the recipient to inform the issuer of its inability to perform the direction. No change made.</p>		
<p>NextEra Energy, Inc.</p>		<p>NextEra has the following additional comments.</p> <p>COM-002-3</p> <p>The purpose of COM-002-3 is:</p> <p>“To ensure Emergency communications between operating personnel are effective.”</p> <p>This stated purpose is not the same as the specific requirement that three-way communication is used for a Reliability Directive. Thus, NextEra requests that the purpose be revised to read as follows:</p> <p>“To ensure that when a Reliability Directive is given that the Reliability Directive is explicitly stated and three-way communication is used.”</p> <p>The majority of stakeholders did not raise any issues with the purposed statement, and the RCSDT believes the current purpose statement is adequate. No change made.</p> <p>Consolidation of COM-002-3 and IRO-001-3</p> <p>NextEra notes a continuing area of concern with the somewhat unsynchronized approach taken in the drafting process. Reliability Standards COM-002 and IRO-001 are now on version three, and still there is a somewhat unsynchronized approach being proposed. A clear and consolidated approach seems easily achievable with minimal effort. Thus, as proposed below, NextEra requests that COM-002-3 and IRO-001-3 be combined, which also would appear to allow for the retirement of certain requirements, such as TOP-001-1 R1-4.</p> <p>The standard TOP-001-1, R1 through R4 is under the purview of another team. No</p>

Organization	Yes or No	Question 6 Comment
		<p>change made.</p> <p>NextEra also is concerned that the current approach may have contributed to several significant misstatements in IRO-001-3, R1-3, which use the terms “direct,” “direction” and “directed,” instead of the term Reliability Directive as used in COM-002-3. COM-002-3 and IRO-001-3 indicate that three-way communication only is required when a Reliability Directive is issued.</p> <p>The word “direction” connects with the language in the R1 (act or direct). Reliability Directives is a subset of “direction,” No change made.</p> <p>This begs the question of what are the potentially other, lower classes of directives in IRO-001-3 R1-3?</p> <p>And why do they need to be followed with or without three-way communication?</p> <p>Reliability Directives are identified as such at the time they are issued so the recipient understands the magnitude of the action being directed. No change made.</p> <p>Thus, at a minimum, NextEra requests that the terms direct, direction and directed be deleted from IRO-001-3 R1-3, respectively, and that Reliability Directive be inserted. This change, and other proposed changes, are reflected in NextEra’s overall proposal to combine COM-002-3 and IRO-001-3 into one COM-002-3 standard: {Note: If the term Adverse Reliability Impact is revised as proposed by NextEra, then the term would not need to be stricken.</p> <p>The RCSDT understands some of the benefits with combining the standards; however, at this point, it would further delay the progress of the standards.</p> <p>The word “direction” connects with the language in the R1 (act or direct). Reliability Directives is a subset of “direction.” No change made.</p> <p><i>R1. Each Reliability Coordinator shall have the authority to act and to issue a Reliability Directive to a Transmission Operator, Balancing Authority, Generator Operator and Distribution Provider within its operating region to prevent identified events that may lead to, or to mitigate the magnitude or duration of, an Emergency.</i></p>

Organization	Yes or No	Question 6 Comment
		<p><i>[Violation Risk Factor: High][Time Horizon: Real-time Operations, Same Day Operations and Operations Planning]</i></p> <p><i>R1.1 Each Transmission Operator shall have the authority to act or issue a Reliability Directive to a Balancing Authority, Generator Operator and Distribution Provider within its operating region to prevent identified events that may lead to, or to mitigate the magnitude or duration of, an Emergency. [Violation Risk Factor: High][Time Horizon: Real-time Operations, Same Day Operations and Operations Planning]</i></p> <p><i>R1.2 Each Balancing Authority shall have the authority to act or issue a Reliability Directive to a Generator Operator and Distribution Provider within its balancing region to prevent identified events that may lead to, or to mitigate the magnitude or duration of, an Emergency. [Violation Risk Factor: High][Time Horizon: Real-time Operations, Same Day Operations and Operations Planning]</i></p> <p><i>R2. When a Reliability Coordinator, Transmission Operator or Balancing Authority issues a Reliability Directive, the Reliability Coordinator, Transmission Operator or Balancing Authority shall identify the action as a Reliability Directive to the recipient. [Violation Risk Factor: High][Time Horizon: Real-Time]</i></p> <p><i>R2. Each Balancing Authority, Transmission Operator, Generator Operator, and Distribution Provider that is the recipient of a Reliability Directive shall repeat, restate, rephrase or recapitulate the Reliability Directive. [Violation Risk Factor: High][Time Horizon: Real-Time]</i></p> <p><i>R3. Each Reliability Coordinator, Transmission Operator, and Balancing Authority that issues a Reliability Directive shall either [Violation Risk Factor: High][Time Horizon: Real-Time]:</i></p> <ul style="list-style-type: none"> -Confirm that the response from the recipient of the Reliability Directive (in accordance with Requirement R2) was accurate, or -Reissue the Reliability Directive to resolve any misunderstandings.

Organization	Yes or No	Question 6 Comment
		<p><i>R4. Each Transmission Operator, Balancing Authority, Generator Operator, Distribution Provider shall comply with its Reliability Coordinator’s Reliability Directive, unless compliance with the Reliability Directive cannot be physically implemented or unless such actions would violate safety, equipment, regulatory or statutory requirements. [Violation Risk Factor: High] [Time Horizon: Real-time Operations, Same Day Operations and Operations Planning]</i></p> <p><i>R4.1 Each Transmission Operator, Balancing Authority, Generator Operator, and Distribution Provider shall inform its Reliability Coordinator upon recognition of its inability to perform a Reliability Directive in accordance with Requirement R4. [Violation Risk Factor: High] [Time Horizon: Real-time Operations, Same Day Operations and Operations Planning]</i></p> <p><i>R5. Each Balancing Authority, Generator Operator, and Distribution Provider shall comply with its Transmission Operator’s Reliability Directive, unless compliance with the Reliability Directive cannot be physically implemented or unless such actions would violate safety, equipment, regulatory or statutory requirements. [Violation Risk Factor: High] [Time Horizon: Real-time Operations, Same Day Operations and Operations Planning]</i></p> <p><i>R5.1. Each Balancing Authority, Generator Operator, and Distribution Provider shall inform its Transmission Operator upon recognition of its inability to perform a Reliability Directive in accordance with Requirement R5. [Violation Risk Factor: High] [Time Horizon: Real-time Operations, Same Day Operations and Operations Planning]</i></p> <p><i>R6. Each Generator Operator or Distribution Provider shall comply with its Balancing Authority’s Reliability Directive, unless compliance with the Reliability Directive cannot be physically implemented or unless such actions would violate safety, equipment, regulatory or statutory requirements. [Violation Risk Factor: High] [Time Horizon: Real-time Operations, Same Day Operations and Operations Planning]</i></p> <p><i>R6.1. Each Generator Operator or Distribution Provider shall inform its Balancing Authority upon recognition of its inability to perform a Reliability Directive in</i></p>

Organization	Yes or No	Question 6 Comment
		<p><i>accordance with Requirement R6. [Violation Risk Factor: High] [Time Horizon: Real-time Operations, Same Day Operations and Operations Planning]</i></p> <p>Conclusion</p> <p>Given the importance of having clear and concise Reliability Standards on the issue of directives and three-way communication, until the above concerns raised by NextEra in items 4 through 6 are addressed, NextEra intends to continue to vote “no” on COM-001-2, COM-002-3 and IRO-001-3.</p> <p>The RCSDT thanks you for your comment and believes the revisions made to this set of standards is valuable to the industry and within the scope of the project. No change made.</p>
<p>Response: See response above.</p>		
<p>Manitoba Hydro</p>		<p>COM-001-2-Definition ‘Interpersonal Communication’ - for clarity, the definition should explicitly state that data exchange is not included.</p> <p>The standard COM-001 is for Interpersonal Communication capability, which facilitates the communication (i.e., “... to interact, consult, or exchange information.”) and not the exchange of data which is addressed in IRO-010. No change made.</p> <p>-R9 - for clarity, the wording ‘... within 2 hours’ should be replaced with ‘... within 2 hours of the unsuccessful test’. Conforming change required to M9 as well.</p> <p>The RCSDT proposes that R9 correctly identifies and provides clarity for the entities required to have Alternative Interpersonal Communication capability. No change made.</p> <p>-R10 - for clarity, the wording ‘... as identified in R1 through R6...’ should be replaced with ‘... with which it is required to have Interpersonal Communications capability or Alternative Interpersonal Communication capability...’.</p>

Organization	Yes or No	Question 6 Comment
		<p>The RCSDT has modified the language of R10 to refer to R1, R3, and R5, rather than “R1 through R6,” since the responsible entities are limited to the RC, the TOP, and the BA in these requirements.</p> <p>-M6 - the term ‘Adjacent’ needs to be capitalized in the last sentence of the paragraph as ‘Adjacent Balancing Authority’ is a NERC defined term.</p> <p>The RCSDT thanks you for your comment and recognizes the confusion created by having “Adjacent” start the sentence. This gave the appearance of a defined NERC glossary term. The RCSDT has made conforming measures to eliminate this problem. See changes to COM-001-2, R1.2, R2.2, R3.5, R4.3, R5.5, and R6.3.</p> <p>-M7 - ‘that’ in the first line is repeated</p> <p>The RCSDT thanks you for your comment and has made conforming changes to remove the additional word “that.”</p> <p>-M9 - the wording ‘on a monthly basis’ should be replaced with ‘once per calendar month’ to be consistent with the wording of the R9.</p> <p>The RCSDT agrees and the language in M9 has been changed to agree with the language in R9 and the R9 VSL.</p> <p>-M11 - the words ‘that experiences a failure of any of its Interpersonal Communications capabilities’ should be added after Operator to be consistent with the wording of the Requirement</p> <p>The RCSDT thanks you for your comment and has made the conforming changes to Measure M11.</p> <p>-Compliance</p> <p>- 1.3 bulleted sentences - the term ‘historical data’ should be removed. The term ‘evidence’ is sufficiently descriptive and is consistently used in other requirements</p> <p>The RCSDT thanks you for your comment and has made conforming changes to the Data Retention section.</p>

Organization	Yes or No	Question 6 Comment
		<p>-Data Retention</p> <p>(1.3) - The data retention requirements are too uncertain for two reasons. First, the requirement to “provide other evidence” if the evidence retention period specified is shorter than the time since the last audit introduces uncertainty because a responsible entity has no means of knowing if or when an audit may occur of the relevant standard.</p> <p>Secondly, it is unclear what ‘other evidence’, besides the specified logs, recordings and emails, an entity may be asked to provide to demonstrate it was compliant for the full time period since their last audit.</p> <p>The RCSDT thanks you for your comments. The Data Retention language has been updated to be consistent with the Standards Drafting Guidelines.</p> <p>This comment also applies to COM-002-3 and IRO-001-3.</p> <p>-Data Retention (1.3) - COM-002-3 requires that voice recordings are kept for the most recent 3 calendar months but COM-001-2 requires that they be kept for the most recent 12 calendar months. Manitoba Hydro does not see the reliability benefit of storing voice recordings for longer than 3 months and suggests that voice recordings be removed as evidence for COM-001-2.</p> <p>The RCSDT thanks you for your comment and has provided a retention period of 90 days for voice recordings, if chosen by the entity, as a matter of media storage, and 12 months for all other evidence.</p> <p>Evidence of the availability of Interpersonal Communications and Alternative Interpersonal Communications can be demonstrated using the other forms of evidence listed.</p> <p>The RCSDT thanks you for your comment. The measures provide a significant listing of potential evidence, which allows for compliance flexibility. The measures are examples and the entity is not limited to those examples. No change made.</p>

Organization	Yes or No	Question 6 Comment
		<p>-VSLs (general comment)</p> <p>- for clarity, use for example R1.1 and R1.2 to refer to requirements instead of Part 1.1 and Part 1.2.</p> <p>The RCSDT thanks you for your comment and has made conforming changes to the Data Retention section.</p> <p>-VSLs R4 - a reference to R4.3 is missing</p> <p>The RCSDT thanks you for your comment and has made conforming changes to the VSL section.</p> <p>COM-002-3-Title</p> <p>- to capture the purpose and intent of the standard, the title should be changed to 'Emergency Communications'.</p> <p>The RCSDT believes the title adequately captures the standard's scope. No change made.</p> <p>-R2 - for clarity, the words 'back to the sender' should be added to the end of the sentence</p> <p>The RCSDT believes the current wording clearly identifies the issuer. No change made.</p> <p>-R3 - for clarity, the words 'to the recipient' should be added to both of the bulleted sentences after 'confirm' and 'reissue'. The words 'evident from the response' should be added to the end of the second bullet.</p> <p>The RCSDT believes the current wording is clear as to who is the recipient. No change made.</p> <p>-A question for the drafting team: has it been discussed whether there should be an additional requirement which indicates that the Reliability Coordinator, Transmission Operator and Balancing Authority shouldn't take any action in a Reliability Directive</p>

Organization	Yes or No	Question 6 Comment
		<p>until such time as it has been confirmed accurate by the sender?</p> <p>If so, does the team feel that it's a worthwhile requirement to consider?</p> <p>RCSDT believes having an additional requirement is unnecessary and would be overly prescriptive. No change made.</p> <p>-M2 - the words 'restated, rephrased or recapitulated' should be added after 'repeated' to be consistent with wording of the requirement.</p> <p>The RCSDT thanks you for your comment and has made conforming changes to the Measure, M2 in COM-002.</p> <p>-M3 - the words 'to show' should be deleted from the end of this paragraph.</p> <p>The RCSDT thanks you for your comment and has made conforming changes to the Measure, M3 in COM-002.</p> <p>IRO 001-3-Purpose</p> <p>- the words 'to the Bulk Electric System' already appear in the definitions of Emergency and Adverse Reliability Impact and do not need to be repeated here.</p> <p>The RCSDT thanks you for your comment and has made conforming changes to the Purpose in IRO-001.</p> <p>-Effective Date</p> <p>- the effective date should be changed to the 2nd calendar quarter following BOT approval in jurisdictions not requiring regulatory approval to be consistent with jurisdictions requiring regulatory approval.</p> <p>The RCSDT thanks you for your comment and has made conforming changes to make IRO-001 the same as COM-001 and COM-002.</p> <p>-General comment</p> <p>- There are repeated references to 'identified events'</p>

Organization	Yes or No	Question 6 Comment
		<p>- it is not clear what this is referring to.</p> <p>The context of “identified” is when a set of system conditions is recognized that could lead to an Emergency or Adverse Reliability Impact, which may require action. See standards IRO-008 and IRO-009. No change made.</p> <p>M1 - M1 refers to Adverse Reliability Impacts “within its Reliability Coordinator Area.” The requirement does not refer to ‘within its Reliability Coordinator Area’ - the wording in the measure and in the requirement should be consistent.</p> <p>The RCSDT thanks you for your comment and has made conforming changes to IRO-001, M1 to remove the phrase “within its Reliability Coordinator Area.”</p> <p>M2 - missing the word ‘physically’ when describing that a direction could not be implemented, should be consistent with the wording in the requirement.</p> <p>The RCSDT thanks you for your comment and has made conforming changes to make IRO-001 measure M2.</p> <p>Compliance</p> <p>- the entire section needs to be updated as it refers to requirements and measures that don’t exist.</p> <p>The RCSDT thanks you for your comment and has made conforming changes to make IRO-001 Compliance section 1.3 to remove the invalid references.</p> <p>-VSLs R2 - the reference to ‘fully comply’ is very vague. It is only a violation if the entity does not fall within the exception.</p> <p>The RCSDT thanks you for your comment and has made conforming changes to make IRO-001, R2, High VSL to be more consistent with the R2.</p> <p>- R2 VSL - For clarity, change “RC’s directive” to “Reliability Coordinator’s Reliability Directive.”</p> <p>The RCSDT thanks you for your comment and has made conforming changes to make</p>

Organization	Yes or No	Question 6 Comment
		IRO-001, VSL R2, High VSL.
Response: See response above.		
Great River Energy		<p>In IRO-001-3 "authority" should be removed and the verbiage returned to "shall act."</p> <p>The RCSDT believes that other standards (i.e., IRO-009, R3 & R4 and EOP-002, R1 & R8) address the action of others and if the term "authority" is omitted, creates a generic requirement such as what has been suggested puts the RC in a double jeopardy situation. No change made.</p> <p>In COM-002-3 R2 and in Applicability we suggest removing the Distribution Provider as the RC would not likely give a Reliability Directive to a Distribution Provider. The Reliability Directive would more likely come from the Transmission Operator to the Distribution Provider.</p> <p>The RCSDT believes that other standards (i.e., IRO-009 - R3 & R4, EOP-002 - R1 & R8) address the action of others and if the term "authority" is omitted, creates a generic requirement such as what has been suggested puts the RC in a double jeopardy situation. No change made.</p> <p>In COM-002-3 R3 we "replacing "Reissue" with "Restate." You are not technically reissuing the Reliability Directive.</p> <p>COM-002-3, R3: The communications described are not intended to be a once-through process. Effective communications, sometimes referred to as three-part or three-way, often may be effective only after numerous iterations. The RCSDT believes the likely first effort to clarify would be to re-issue the instructions just to determine whether the recipient simply "heard wrong." Using the word re-state seems to imply that the wording is incorrect in some way or for some other reason needs to be said a different way. The RCSDT believes it is more likely that the issuer is attempting to bet the recipient to understand and therefore believes that reissue is more appropriate. No change made.</p>

Organization	Yes or No	Question 6 Comment
<p>Response: See response above.</p>		
<p>Orange and Rockland Utilities, Inc.</p>		<p>Regarding COM-002 Requirement R1, we recommend that this requirement be reworded as follows:</p> <p><i>“When a Reliability Coordinator, Transmission Operator or Balancing Authority requires actions to be executed as a Reliability Directive, the Reliability Coordinator, Transmission Operator or Balancing Authority shall require that the Reliability Directive be communicated using three-part communications as described in Requirements R2 and R3 of this standard.”</i></p> <p>The reason for this recommended rewording are threefold:</p> <ol style="list-style-type: none"> <i>1. Good operating practice calls for use of three-part communications at all times. The recommended re-write encourages the use of the good operating practice of three-part communications at all times, but does not require it.</i> <i>2. It is not good operating practice to require that an additional (unnecessary) phrase be used during emergency situations. During emergency situations, it is best to use standard operating protocols so as to limit unnecessary burdens on operating personnel during critical and stressful times.</i> <i>3. By implementing the proposed new R1 requirement, it would effectively weaken the need for rigorous compliance with any and all directives issued by the RC’s, TO’s or BA’s. Regarding IRO-001 Requirement R1, we recommend that the current requirement R3 be reinstated as the new requirement R1.</i> <p>That is, the new requirement R1 should read as follows:</p> <p><i>“R1. The Reliability Coordinator shall have clear decision-making authority to act and to direct actions to be taken by Transmission Operators, Balancing Authorities, Generator Operators, Transmission Service Providers, Load-Serving Entities, and Purchasing-Selling Entities within its Reliability Coordinator Area to preserve the integrity and reliability of the Bulk Electric System. These actions shall be taken</i></p>

Organization	Yes or No	Question 6 Comment
		<p><i>without delay, but no longer than 30 minutes.”</i></p> <p>We do not support any further dilution of Reliability Coordinator authority to enforce Reliability Directives through deletion of the 30 minute maximum response time period. The timely actions in response to any Reliability Coordinator issued Reliability Directives is an essential part of the process.</p>
<p>Response: The RCS DT development of IRO-001-3 R1 states “...which could include issuing Reliability Directives...” and, therefore, does not preclude its use if it is determined by the RC to use it. There may be instances where the RC discusses operational issues in normal dialogue with entities that do not require the use of Reliability Directive. No change made.</p>		
<p>Niagara Mohawk (dba National Grid)</p>		<p>COM-001-3</p> <p>- Some requirements are overly prescriptive and not results based.</p> <p>R7 & R8 are not necessary. Every entity at a minimum has a contact with a phone as their "Interpersonal Communications capability." Just need to require that every entity has a plan if they lose their primary communication channel ("Interpersonal Communications capability").</p> <p>The standard establishes requirement for communication capability appropriate to ensure reliability. There is no requirement for it to be different from the Interpersonal Communication capability that its Balancing Authority has with it nor the Interpersonal Communication capability that its Transmission Operator has with it. Cooperation and coordination is always encouraged and is an excellent practice, but is not required by this standard. Thank you for your suggestion. No change made.</p> <p>COM-002-3</p> <p>- Requiring RCs, TOPs and BAs to state an action as a "reliability directive" complicates communications during a time when response time and clarity are important. If those issuing a directive don't get a repeat back they just need to ask for one. The requirement just needs to define "what" is required not "how." This</p>

Organization	Yes or No	Question 6 Comment
		<p>can be handled by procedures and training.</p> <p>The requirement is aimed at being a performance-based requirement and states a description of “what” communication must take place, but does not prescribe “how” the communication is to be made. Adding the suggested phrase “immediately upon receiving it” introduces the ambiguous term “immediately” for which there is neither plain meaning nor simple explanation. What must happen is that the recipient must respond in such a way that the issuer may determine whether the message has been properly understood. The RCSDT concludes that the proposed language gives plain meaning. No change made.</p> <p>- Delete reference to "adverse reliability impact" from the "Directive" definition. The "adverse reliability impact" definition is not clear, is this an actual event or contingency?</p> <p>The words imply it is an actual event which is already covered in the "Directive" definition. If the intent is to apply directives to potential stability or cascading contingencies it should say so.</p>
<p>Response: The RCSDT thanks you for your comment; however, the RCSDT believes the definition captures two independent conditions, anticipated and after or post event. The definition of Emergency implies situations where the event is anticipated or currently happening. Likewise, the definition of Adverse Reliability Impact clearly identifies as a potential or actual event in the phrase, “an event that results in.” Both conditions are important to the definition. The RCSDT notes that the term, “Adverse Reliability Impact,” is a currently defined NERC Glossary term. The term as it appears in the standard is the revised term is the NERC Board of Trustee adopted term: The impact of an event that results in Bulk Electric System instability or Cascading. No change made.</p>		
American Electric Power		<p>COM-001-02</p> <p>R9: A two hour limit to repair or designate a replacement Alternative Interpersonal Communications capability is overly aggressive.</p> <p>COM-001-2, R9: The requirement is to initiate repair or designate an Alternative Interpersonal Communication capability within two hours. The requirement is NOT to have the repair completed within two hours. The requirement recognizes that the</p>

Organization	Yes or No	Question 6 Comment
		<p>entity may use its Alternative Interpersonal Communication capability now as its Interpersonal Communication capability, and then, if it decides to do so, designate another, if you may, “new” Alternative Interpersonal Communication capability. This is not required, but is an option that the entity can consider. The entity may already have a maintenance and repair agreement in place that will respond and repair the failed capability. No change made.</p> <p>COM-002-03</p> <p>R1: Should this requirement also include references to a manual action?</p> <p>The RCSDT believes adding the word “manual” is unnecessary and overly prescriptive. No change made.</p> <p>COM-002-03</p> <p>R3:The text “to resolve any misunderstandings” is unnecessary and should be removed.</p> <p>The RCSDT believes this phrase is essential to the process of communications. No change made.</p> <p>COM-002-3 VSL’s:</p> <p>As we have stated on previous projects, all severity levels need to be commensurate with both:</p> <p>a) the degree by which the requirement was violated, and</p> <p>The RCSDT has followed the VSL Guidelines in properly assigning the VSL as binary. No change made.</p> <p>b) by the impact of the violation to the BES. In this case, a single VSL of “Severe” violates both principles.</p> <p>The RCSDT notes the Violation Risk Factors define the potential impact to the BES; whereas, the VSL is how badly an entity violated the requirement. No change made.</p>

Organization	Yes or No	Question 6 Comment
		<p>There needs to be more gradients across the severity levels, and the single VSL of “Severe” incorrectly makes the assumption that the impact to the BES was severe.</p> <p>The RCSDT has followed the VSL Guidelines in properly assigning the VSL as binary. No change made.</p> <p>IRO-001-3</p> <p>R1, R2, R3: Having this requirement apply to actions and/or directions (which may be different than Reliability Directives) may put the recipient in a position that they are judged on whether or not they acted on communication that was not a Reliability Directive.</p> <p>The RCSDT views R1 as an authority requirement to direct others, which could include a subset of direction called, Reliability Directive. Requirement R2 is the response requirement for the recipient. The judgment the recipient is under is that the recipient must comply with the direction, unless the direction cannot be physically implemented or unless such actions would violate safety, equipment, regulatory or statutory requirements. Requirement R3 is simply requires the recipient to inform the issuer of its inability to perform the direction. No change made.</p> <p>The draft states that the purpose of this standard is “To establish the capability and authority of Reliability Coordinators to direct other entities to prevent an Emergency or Adverse Reliability Impacts to the Bulk Electric System.” The key word used is “direct”, so communications that need to be acted upon should be Reliability Directives only. The addition of any non-defined term is in conflict with the definition and intent of the term Reliability Directive. This could potentially cause confusion, especially at critical times when communication is key.</p>
<p>Response: See response above.</p>		
Georgia Transmission		The following comments are regarding IRO-001-3.

Organization	Yes or No	Question 6 Comment
Corporation		<p>Requirement R1 should require the use of Reliability Directives. The requirement compels the Reliability Coordinator “to direct others to act to prevent identified events or mitigate the magnitude or duration of actual events that result in an Emergency or Adverse Reliability Impact.” Reliability Directives are necessary to address Adverse Reliability Impacts or Emergencies and trigger the use of three-part communications identified in COM-002-3.</p> <p>The RCSDT views R1 as an authority requirement to direct others, which could include a subset of direction called, Reliability Directive. Requirement R2 is the response requirement for the recipient. The judgment the recipient is under is that the recipient must comply with the direction, unless the direction cannot be physically implemented or unless such actions would violate safety, equipment, regulatory or statutory requirements. Requirement R3 is simply requires the recipient to inform the issuer of its inability to perform the direction. No change made.</p> <p>COM-002-3 R1 really compels the Reliability Coordinator to use a Reliability Directive for Emergencies and Adverse Reliability Impacts with the opening clause:</p> <p>“When a Reliability Coordinator, Transmission Operator, or Balancing Authority determines actions need to be executed as a Reliability Directive.” What else could be more important for a Reliability Coordinator to issue a Reliability Directive than for an Emergency or Adverse Reliability Impact?</p> <p>Thus, not requiring the use of Reliability Directives for Adverse Reliability Impacts and Emergencies makes IRO-001-3 R1 and COM-002-3 R1 inconsistent.</p> <p>The RCSDT development of IRO-001-3 R1 states “...which could include issuing Reliability Directives...” and, therefore, does not preclude its use if it is determined by the RC to use it. There may be instances where the RC discusses operational issues in normal dialogue with entities that do not require the use of Reliability Directive. No change made.</p> <p>It is recommended that the treatment of Reliability Directives shall be consistent</p>

Organization	Yes or No	Question 6 Comment
		<p>with those being developed for TOP-001-2 as proposed by the Real-Time Operations drafting team (Project 2007-03).</p> <p>The RCSDT is using the term in the same context in this standard as it is in TOP-001-2. No change made.</p> <p>As such, consider using the following language for R2: “Each TOP, BA, and GOP shall comply with each identified Reliability Directive issued and identified as such by its RC, unless such actions would violate safety, equipment, regulatory, or statutory requirements.”</p> <p>The RCSDT is addressing a directive (P487, Order 693) to include the DP in COM-001 and the RCSDT has included the DP in COM-002 and IRO-001 applicability because these standards are related to reliability communications. The RCSDT agrees with the point that communication will most likely be from the BA or TOP; however, the communications may come from the RC. No change made.</p> <p>Accordingly, please consider using the following language for R3:</p> <p>“Each TOP, BA, and GOP shall inform its RC of its inability to perform an identified Reliability Directive issued by that RC.” Again, we do not believe the DP would receive an identified Reliability Directive directly from the RC and the DP applicability should be removed from this standard. The DP is appropriately captured under COM-002 and TOP-001 with respect to Reliability Directives.</p> <p>Accordingly, NERC’s Reliability Functional Model V5 describes and identifies the DP’s relationships with other functional entities to TOP and BA with respect to Real Time.</p> <p>Real Time⁹</p> <p>7. Implements voltage reduction and sheds load as directed by the Transmission Operator or Balancing Authority.</p>

⁹ NERC Functional Model Version 5, “Functional Entity – Distribution Provider,” pg 47, (http://www.nerc.com/files/Functional_Model_V5_Final_2009Dec1.pdf)

Organization	Yes or No	Question 6 Comment
		<p>8. Implements system restoration plans as coordinated by the Transmission Operator.</p> <p>9. Directs Load-Serving Entities to communicate requests for voluntary load curtailment.</p> <p>The following comments are regarding COM-001-2.</p> <p>With respect to the Functional Model V5, please see Page 31, “18. Issues corrective actions and emergency procedures directives (e.g., curtailments or load shedding) to Transmission Operators, Balancing Authorities, Generator Operators, Distribution Providers, and Interchange Coordinators.” No change made.</p> <p>The SDT should include an additional qualifier to Interpersonal Communications within the context of these requirements, for example (operational or dispatch center communications??). Technically, the air we breathe, as well as other mediums like “any” cell phone, fax lines, and/or email accounts would qualify under this proposed definition of Interpersonal Communication. Assuming at least one employed individual can speak, all entities could demonstrate compliance of this capability at all times, therefore, it is not clear the intent of these requirements are accurately being presented.</p> <p>The RCSDT appreciates your comment and has made clarifying changes by removing the phrase “any of” in COM-001, R11. Additionally, the RCSDT made a clarifying change to indicate the DP and GOP only need to consult with the entity affected by the failure.</p> <p>It is recommended to include the use of “signed attestation letters” as examples of evidence under M4 and M11 and other measures as appropriate.</p> <p>The RCSDT proposes that R4 and R11 allow for compliance flexibility. A “signed attestation letter” is one form of evidence. The measures are examples and the entity is not limited to those examples. No change made.</p>

Organization	Yes or No	Question 6 Comment
Response: See response above.		
BGE		No comment.
Response: No comment provided.		
Nebraska Public Power District		<p>Comments: COM-001-2:</p> <p>Requirement 10 is too open ended as written. The measure, M10, indicates that only impacted entities need to be notified. The requirement should be changed to make it consistent with the measure. The requirement would then read ‘Each RC, TOP And BA shall notify impacted entities as identified...’Requirements 3 and 5 place the responsibility for establishing Interpersonal Communication capability on the TOP and BA. It is quite conceivable that a TOP or BA may not know all, or newly, registered DPs and GOPs in its respective area.</p> <p>The word “impacted” was removed in previous postings. For further clarification, the RCSDT has modified M10 to remove the word “impacted” to be consistent with R10. For additional clarity, the RCSDT also changed the phrase in R10 and M10, “R1 through R6” to “R1, R3, and R5,” to clarify that it applies to the capabilities with the RC, the TOP, and the BA.</p> <p>In Requirements 7 and 8, the DP and GOP, respectively, are in turn responsible for establishing Interpersonal Communication capability. The TOPs/BAs and the DPs/GOPs should not be responsible for this. The DPs and GOPs should be held accountable for requesting that capability of their TOP and BA. Therefore, we suggest adding the following phrase at the end of Requirements 3.3, 3.4, 5.3 and 5.4 - ‘that has requested Interpersonal Communications capability.’</p> <p>Then R3.3 would read ‘Each Distribution Provider within its Transmission Operator Area that has requested Interpersonal Communications capability.’</p> <p>The standard establishes requirement for communication capability appropriate to</p>

Organization	Yes or No	Question 6 Comment
		<p>ensure reliability. There is no requirement for it to be different from the Interpersonal Communication capability that its Balancing Authority has with it nor the Interpersonal Communication capability that its Transmission Operator has with it. Cooperation and coordination is always encouraged and is an excellent practice, but is not required by this standard. Thank you for your suggestion. No change made.</p> <p>Requirement 9: could be construed to mean that the repair or replacement due to an unsuccessful test should be completed within 2 hours. In any case a rewording of the second sentence of Requirement 9 would make it clear and we would suggest the following:</p> <p>“ The responsible entity shall, within 2 hours of the unsuccessful test, provide notification to the proper authority in order to initiate repair or designate a replacement Alternative Interpersonal Communications capability. “</p> <p>COM-001-2, R9: The requirement is to initiate repair or designate an Alternative Interpersonal Communication capability within two hours. The requirement is NOT to have the repair completed within two hours. The requirement recognizes that the entity may use its Alternative Interpersonal Communication capability now as its Interpersonal Communication capability; and then, if it decides to do so, designate another, if you may, “new” Alternative Interpersonal Communication capability. This is not required, but is an option that the entity can consider. The entity may already have a maintenance and repair agreement in place that will respond and repair the failed capability. No change made.</p> <p>COM-002-3:</p> <p>Requirement 2/Measure 2: There is an inconsistency between the requirement and the measure. The requirement allows the recipient to repeat, restate, rephrase or recapitulate the directive. Measure 1 [See M2] only mentions repeating the directive.</p> <p>The RCDST appreciates your observation. The phrases “restate, rephrase or</p>

Organization	Yes or No	Question 6 Comment
		<p>recapitulate,” have been added to Measure, M2.</p> <p>Requirement 3: The second bullet in Requirement 3 appears to require the reissuance of an entire Reliability Directive if only a single point in the directive is not correctly repeated, restated, rephrased or recapitulated. Is this what the SDT intended?</p> <p>Shouldn’t consideration be given for that portion of the directive that was communicated properly? Then only a new, revised directive containing the portion of the original directive that was misunderstood would need to be reissued.</p> <p>The RCSDT’s intention of the requirement is to confirm the communication is confirmed accurate and, if not, any misunderstanding is corrected. The requirement does not limit the entity to reissuing the entire Reliability Directive. So an entity is not precluded from only correcting the portion of the misunderstanding. No change made.</p>
<p>Response: See response above.</p>		
<p>Georgia System Operations</p>		<p>Requirement R1 should require the use of Reliability Directives. The requirement compels the Reliability Coordinator “to direct others to act to prevent identified events or mitigate the magnitude or duration of actual events that result in an Emergency or Adverse Reliability Impact.” Reliability Directives are necessary to address Adverse Reliability Impacts or Emergencies and trigger the use of three-part communications identified in COM-002-3.</p> <p>COM-002-3 R1 really compels the Reliability Coordinator to use a Reliability Directive for Emergencies and Adverse Reliability Impacts with the opening clause: “When a Reliability Coordinator, Transmission Operator, or Balancing Authority determines actions need to be executed as a Reliability Directive.” What else could be more important for a Reliability Coordinator to issue a Reliability Directive than for an Emergency or Adverse Reliability Impact? Thus, not requiring the use of Reliability Directives for Adverse Reliability Impacts and Emergencies makes IRO-001-3 R1 and</p>

Organization	Yes or No	Question 6 Comment
		<p>COM-002-3 R1 inconsistent.</p> <p>The RCSDT development of IRO-001-3 R1 states “...which could include issuing Reliability Directives...” and, therefore, does not preclude its use if it is determined by the RC to use it. There may be instances where the RC discusses operational issues in normal dialogue with entities that do not require the use of Reliability Directive. No change made.</p> <p>It is recommended that the treatment of Reliability Directives shall be consistent with those being developed for TOP-001-2 as proposed by the Real-Time Operations drafting team (Project 2007-03).</p> <p>The RCSDT is using the term in the same context in this standard as it is in TOP-001-2. No change made.</p> <p>As such, consider using the following language for R2: “Each TOP, BA, and GOP shall comply with each identified Reliability Directive issued and identified as such by its RC, unless such actions would violate safety, equipment, regulatory, or statutory requirements.”</p> <p>Accordingly, please consider using the following language for R3:</p> <p>“Each TOP, BA, and GOP shall inform its RC of its inability to perform an identified Reliability Directive issued by that RC.” Again, we do not believe the DP would receive an identified Reliability Directive directly from the RC and the DP applicability should be removed from this standard. The DP is appropriately captured under COM-002 and TOP-001 with respect to Reliability Directives.</p> <p>The RCSDT believes the latitude afforded in R2 and R3 allows for normal operational dialogue that may not require the use of Reliability Directive. The RC determines when Reliability Directive is applicable. No change made.</p> <p>With respect to the Functional Model V5, please see Page 31, “18. Issues corrective actions and emergency procedures directives (e.g., curtailments or load shedding) to Transmission Operators, Balancing Authorities, Generator Operators, Distribution</p>

Organization	Yes or No	Question 6 Comment
		<p>Providers, and Interchange Coordinators.” No change made.</p> <p>The RCSDT is addressing a directive (P487, Order 693) to include the DP in COM-001 and the RCSDT has included the DP in COM-002 and IRO-001 applicability because these standards are related to reliability communications. The RCSDT agrees with the point that communication will most likely be from the BA or TOP; however, the communications may come from the RC. No change made.</p> <p>Accordingly, NERC’s Reliability Functional Model V5 describes and identifies the DP’s relationships with other functional entities to TOP and BA with respect to Real Time. Real Time¹⁰</p> <p>7. Implements voltage reduction and sheds load as directed by the Transmission Operator or Balancing Authority.</p> <p>8. Implements system restoration plans as coordinated by the Transmission Operator.</p> <p>9. Directs Load-Serving Entities to communicate requests for voluntary load curtailment.</p> <p>The following comments are regarding COM-001-2.</p> <p>With respect to the Functional Model V5, please see Page 31, “18. Issues corrective actions and emergency procedures directives (e.g., curtailments or load shedding) to Transmission Operators, Balancing Authorities, Generator Operators, Distribution Providers, and Interchange Coordinators.” No change made.</p> <p>The SDT should include an additional qualifier to Interpersonal Communications within the context of these requirements, for example (operational or dispatch center communications???)¹⁰. Technically, the air we breathe, as well as other mediums like “any” cell phone, fax lines, and/or email accounts would qualify under</p>

¹⁰ NERC Functional Model Version 5, “Functional Entity – Distribution Provider,” pg 47, (http://www.nerc.com/files/Functional_Model_V5_Final_2009Dec1.pdf)

Organization	Yes or No	Question 6 Comment
		<p>this proposed definition of Interpersonal Communication. Assuming at least one employed individual can speak, all entities could demonstrate compliance of this capability at all times, therefore, it is not clear the intent of these requirements are accurately being presented.</p> <p>The RCSDT appreciates your comment and has made clarifying changes by removing the phrase “any of” in COM-001, R11. Additionally, the RCSDT made a clarifying change to indicate the DP and GOP only need to consult with the entity affected by the failure.</p> <p>The RCSDT agrees with your assessment of “medium” and included the term to allow flexibility for an entity to communicate as they determine and demonstrate compliance. Two or more individuals are required for communication to occur where they interact, consult or exchange information. No change made.</p> <p>The RCSDT proposes that R4 allows for compliance flexibility. “Signed attestation letters” could qualify as “equivalent evidence” as stated in M4 and M11. No change made. It is recommended to include the use of “signed attestation letters” as examples of evidence under M4 and M11 and other measures as appropriate.</p> <p>The RCSDT proposes that R4 and R11 allow for compliance flexibility. A “signed attestation letter” is one form of evidence. The measures are examples and the entity is not limited to those examples. No change made.</p>
<p>Response: See response above.</p>		
<p>Ingleside Cogeneration LP</p>		<p>Ingleside Cogeneration LP is concerned that the entity-to-entity organization of the COM Standards is quickly being outdated by voice and video conferencing or one-to-many broadcasts. In addition, email may be a preferred mode of most communications to and from small Generator Operators.</p> <p>It is not clear that these technologies are precluded from consideration by COM-001 and COM-002 - which means that some auditors may believe that they are. This leads to inconsistent application of the compliance criteria, and may discourage the</p>

Organization	Yes or No	Question 6 Comment
		<p>use of some powerful technologies. It appears to us that some technical guidelines would be appropriate to help entities and auditors decide which are applicable under these Standards.</p>
<p>Response: The RCSDT proposes that COM-001-2 and COM-002-3, as written, allows flexibility for an entity to communicate where two or more individuals are required for communication to occur and they interact, consult or exchange information. Compliance is contained in the measures and an entity must determine if their communication method can demonstrate compliance with the requirements. No change made.</p>		
<p>Duke Energy</p>		<p>- COM-001-2 does not specify how much time an entity is allowed to restore failed Interpersonal Communications capability or failed Alternative Interpersonal Communications capability.</p> <p>R1 through R6 require that the RC, TOP and BA have both. R7 and R8 require that DPs and GOPs have Interpersonal Communications capability. An auditor could find an entity non-compliant with these requirements upon failure of either capability.</p> <p>The RCSDT thanks you for your comment. Requirements R7 and R8 have been revised to account for the failure of Interpersonal Communication capability. The intent of R11 is to require the responsible entity to take action upon the failure of its Interpersonal Communication.</p> <p>R9, R10 and R11 specify actions to take upon failure, but do not relieve entities of responsibility under R1 through R8.</p> <p>The RCSDT believes non-compliance is not due solely to the failure of any Interpersonal Communication capability, but must be accompanied by a failure to consult with the applicable Transmission Operator or Balancing Authority to establish mutually agreeable action for restoration. No change made.</p> <p>-COM-001-2 R9, M9 and VSLs - M9 and VSLs should be revised to be consistent with wording of R9 phrase “at least once per calendar month.”</p> <p>The RCSDT agrees with your comments and has aligned M9 and the R9 VSL to the R9</p>

Organization	Yes or No	Question 6 Comment
		<p>to use “once each calendar month.”</p> <p>-COM-001-2 R10, M10 and VSLs - Clarity is needed regarding when the 60-minute clock starts. For example, suppose a failure is detected immediately upon occurrence of the failure. Does the 60-minute clock start immediately, or after the failure has lasted 30 minutes? When does the 60-minute clock start if a failure is detected and the entity is unsure when it occurred?</p> <p>The RCSDT proposes that upon detection of failure that continues at least 30 minutes, starts the 60-minute clock. The 30 minutes allows an entity time to restore or determine if it can restore its Interpersonal Communication capability before the clock starts. No change made.</p> <p>-COM-001-2 R10, M10 and VSLs - If the failure only lasts for 35 minutes, it appears that the RC, TOP or BA is still required to notify entities identified in R1 through R6. Is this the drafting team’s intent?</p> <p>Yes. The clock starts upon detection of failure of at least 30 minutes. No change made.</p> <p>-COM-001-2 R10, M10 and VSLs - Should be revised since the RC, TOP and BA are only required to have Alternative Interpersonal Communications capability with other RCs, TOPs and BAs per R2, R4 and R6.</p> <p>For additional clarity, the RCSDT also changed the phrase in R10 and M10, “R1 through R6” to “R1, R3, and R5,” to clarify that it applies to the capabilities with the RC, the TOP, and the BA.</p> <p>Suggested rewording for R10:</p> <p><i>“Each Reliability Coordinator, Transmission Operator and Balancing Authority shall notify entities with which it is required to have Alternative Interpersonal Communications capability as identified in R2, R4 and R6 within 60 minutes of the detection of a failure of its Interpersonal Communications capabilities that lasts 30 minutes or longer.”</i></p>

Organization	Yes or No	Question 6 Comment
		<p>-COM-001-2 M11 and VSL - Replace the word “their” with the word “its.” The RCSDT agrees and has modified M11 and VSL, as you suggested.</p> <p>-COM-001-2 Data Retention - The way Data Retention is being enforced, this whole section could just be reduced to a blanket statement that an entity must be able to provide evidence that it has been in compliance since its last audit. The RCSDT has provided the Data Retention section consistent with the approved Standard Drafting Team Guidelines. No change made.</p> <p>-COM-002-3 R2, M2 and VSL - Replace “and” with “or.” The RCSDT agrees with your comment and modifies R2, M2, and VSL accordingly. Also, the phrase “repeat, restate, rephrase or recapitulate” seems excessive and may be intended to avoid a violation where an entity fails to repeat the Reliability Directive word for word. Suggested rewording: “Each Balancing Authority, Transmission Operator, Generator Operator or Distribution Provider that is the recipient of a Reliability Directive shall repeat the Reliability Directive back to the issuer with sufficient accuracy so that understanding can be confirmed.” The RCSDT believes the term suggested “sufficient accuracy” is subject to interpretation. The RCSDT proposes the terms to allow a recipient to convey the message back to the issuer without a word-for-word requirement as long as the issuer confirms the accuracy of the response or reissues it to resolve any misunderstanding. No change made.</p> <p>-COM-002-3 R3, M3 - Replace “and” with “or.” The RCSDT agrees with your comment and modifies R3, M3, and VSL accordingly.</p> <p>-IRO-001-3 - We believe that the Purpose and the Requirements of this standard should be focused solely on situations where the Reliability Coordinator issues Reliability Directives to prevent an Emergency or Adverse Reliability Impact.</p>

Organization	Yes or No	Question 6 Comment
		<p>The RCSDT development of IRO-001-3 R1 states “...which could include issuing Reliability Directives...” and, therefore, does not preclude its use if it is determined by the RC to use it. There may be instances where the RC discusses operational issues in normal dialogue with entities that do not require the use of Reliability Directive. No change made.</p> <p>IRO-001-3 - The Purpose should be rewritten as follows: “To establish the authority of Reliability Coordinators to issue Reliability Directives to other entities to prevent an Emergency or the impact of an event that results in Bulk Electric System instability or Cascading.”</p> <p>The RCSDT appreciates the suggested rewording; however, the RCSDT development of the IRO-001-3 Purpose Statement allows for instances where the RC discusses operational issues in normal dialogue with entities that do not require the use of Reliability Directive. The requirements of IRO-001-3 allow the RC to issue a Reliability Directive if they determine one should be issued. No change made.</p> <p>-IRO-001-3 - R1 should be rewritten as follows: “Each Reliability Coordinator shall have authority to act or to issue Reliability Directives to others, including but not limited to the Transmission Operator, Balancing Authority and Generator Operator within its Reliability Coordinator Area to prevent identified events or mitigate the magnitude or duration of actual events that result in an Emergency or the impact of an event that results in Bulk Electric System instability or Cascading.”</p> <p>The RCSDT appreciates the suggested rewording; however, the Functional Model V5 addresses the scope of the RC function. No change made.</p> <p>-IRO-001-3 - R2 should be rewritten as follows: <i>“Each Transmission Operator, Balancing Authority, Generator Operator or Distribution Provider shall comply with a Reliability Directive issued by the Reliability Coordinator unless the Reliability Directive cannot be physically implemented or unless such action would violate safety, equipment, regulatory, or statutory requirements.”</i></p>

Organization	Yes or No	Question 6 Comment
		<p>The RCSDT appreciates the suggested rewording; however, as written R2 allows for normal operational dialogue without having to invoke a Reliability Directive by the RC. No change made.</p> <p>-IRO-001-3 - R3 should be rewritten as follows: “Each Transmission Operator, Balancing Authority, Generator Operator or Distribution Provider shall inform its Reliability Coordinator upon recognition of its inability to comply with a Reliability Directive in accordance with Requirement R2.</p> <p>The RCSDT appreciates the suggested rewording; however, as written R2 allows for normal operational dialogue without having to invoke a Reliability Directive by the RC. No change made.</p> <p>-IRO-001-3 Measures and VSLs - Should be revised to conform with the above suggested revisions to requirements.</p>
<p>Response: See response above.</p>		
ISO New England		none
ERCOT ISO		<p>Regarding COM-001-2:</p> <p>We are not clear on the time horizon of requirements for COM-001-2. Based upon the purpose statement, it appears that establishment would be ahead of real time. Wording in the requirements could be construed as maintaining at all times vs. establishing communications.</p> <p>The RCSDT proposes that compliance with requirements of the standard must be demonstrated. The Purpose Statement is not measured. No change made.</p> <p>The timeline for mandatory/effectiveness may not be acceptable to establish communications with DPs if hardware procurement/projects must take place.</p> <p>The RCSDT considered concerns about the implementation of the requirements by DP and GOPs and concluded the requirements are achievable within the</p>

Organization	Yes or No	Question 6 Comment
		<p>implementation period. No change made.</p> <p>Regarding IRO-001-3:</p> <p>We have some concern for the removal of LSE in particular from R2 and R3 from current IRO-001-2 for the ERCOT region. The ERCOT region has QSEs that manage Load Resources. There may be some QSEs that are not registered as a GOP that deploy Load Resources. Per the current LSE JRO, QSEs with Load Resources are registered as LSEs. Not requiring LSEs to deploy Load Resource directives could be perceived as a reliability gap created from the previous version to this version. PSEs could be removed as long as they fall under BA authority.</p> <p>The RCSDT believes the DP is the correct entity because the LSE does not own assets. The definition of LSE is, “The functional entity that secures energy and transmission service (and reliability related services) to serve the electrical demand and energy requirements of its end use customers.” In contrast, the definition of a DP is, “The functional entity that provides facilities that interconnect an End-use Customer load and the electric system for the transfer of electrical energy to the End-use Customer. Additionally, the Functional Model V5 demonstrates this under the Reliability Coordinator, “18. Issues corrective actions and emergency procedures directives (e.g., curtailments or load shedding) to Transmission Operators, Balancing Authorities, Generator Operators, Distribution Providers, and Interchange Coordinators.” No change made.</p> <p>The Data Retention section should be corrected to match the new requirements numbers and elimination of the previous version R1 with ERO.</p> <p>The Version History mentions six requirements retired, but only details five.</p> <p>The RCSDT thanks you for your comments. The Data Retention language has been updated to be consistent with the Standards Drafting Guidelines.</p>
<p>Response: See response above.</p>		

Organization	Yes or No	Question 6 Comment
ReliabilityFirst		<p>Comments on COM-001-2</p> <p>1. Applicability Section</p> <p>a. RFC recommends adding the Generator Owner to the applicably section of the standard along with corresponding Requirements R8 and R11. ReliabilityFirst believes to maintain system reliability and based on certain business practices in effect, Generator Owners need to be required to have associated Interpersonal Communications with its Balancing Authority and Transmission Operator.</p> <p>The RCSDT considered this situation and have concluded Generator Owners do not operate facilities of the BES. Under the Functional Model V5 Generator Owners have these Relationships with Other Functional Entities. The following is an excerpt from the Functional Model V5 concerning the Generator Owner. No change made.</p> <ol style="list-style-type: none"> 1. Provides generator information to the Transmission Operator, Reliability Coordinator, Balancing Authority, Transmission Planner, and Resource Planner. 2. Provides unit maintenance schedules and unit retirement plans to the Transmission Operator, Balancing Authority, Transmission Planner, and Resource Planner. 3. Develops an interconnection agreement with Transmission Owner on a facility basis. 4. Receives approval or denial of transmission service request from Transmission Service Provider. 5. Provides reliability related services to Purchasing-Selling Entity pursuant to agreement. 6. Reports the annual maintenance plan to the Reliability Coordinator, Balancing Authority and Transmission Operator. 7. Revises the generation maintenance plans as requested by the Reliability Coordinator.

Organization	Yes or No	Question 6 Comment
		<p>2. Requirement R7 and R8</p> <p>a. ReliabilityFirst seeks further clarity on why the Distribution Provider and Generator Operator are not required to designate an Alternative Interpersonal Communications capability?</p> <p>Requirements R7 and R8 require the Distribution Providers and Generator Operators to have Interpersonal Communications capability but there is not corresponding requirement to have an Alternative Interpersonal Communications capability.</p> <p>ReliabilityFirst recommends adding two new requirements for the Distribution Provider and Generator Operator to designate an Alternative Interpersonal Communications capability. This will be consistent with how Requirements R1 through R6 are set up.</p> <p>The standard establishes requirement for communication capability appropriate to ensure reliability. In addition, R7 and R8 are responsive to FERC Order No. 693. Entities may use the telephone cited in the example as their Interpersonal Communication capability. Requirement R11, as modified, addresses the loss of Interpersonal Communication capability. No change made.</p> <p>3. Requirement R9</p> <p>a. Assuming new requirements for the Distribution Provider and Generator Operator to designate an Alternative Interpersonal Communications capability (based on previous comment) are added to the standard, the Distribution Provider and Generator Operator will need to be added to Requirement R9 to test its Alternative Interpersonal Communications capability at least once per calendar month.</p> <p>The RCSDT thanks you for your comment and believes the DP and GOP only need Interpersonal Communication capability and it meets the respective FERC directive. No change made.</p> <p>4. Requirement R10</p> <p>a. Based on the ReliabilityFirst comment submitted for Question 4, ReliabilityFirst</p>

Organization	Yes or No	Question 6 Comment
		<p>believes the Distribution Provider and Generator Operator should be included in Requirement R10.</p> <p>The RCSDT proposes that DP and GOP are included in the requirement. "... shall notify entities..." as identified in R1 through R6. No change made.</p> <p>b. Since Interpersonal Communications capabilities is a very important piece of operating the BES in a reliable manner, ReliabilityFirst believes the timeframe in which an entity is required to notify the entities is too long. ReliabilityFirst recommends the following language for Requirement R10:</p> <p>i. Each Reliability Coordinator, Transmission Operator, Balancing Authority, Distribution Provider and Generator Operator shall notify entities as identified in Requirements R1 through R8 of a failure of its Interpersonal Communications capabilities that lasts 15 minutes or longer. The notification shall be made within 30 minutes of the detection of a failure.</p> <p>The RCSDT proposed the time frame to allow sufficient time for an entity to determine if IC could be restored. No change made.</p> <p>5. VSLs for Requirement R1 through R8</p> <p>a. ReliabilityFirst suggest gradating the VSLs for R1 through R8. Listed below is an example of how to gradate the VSL for R1. The same type of approach could be used for R2 through R8 as well.</p> <p>i. High VSL- the Reliability Coordinator failed to have Interpersonal Communications capability with one or more of the entities listed in Parts 1.1 or 1.2.</p> <p>ii. Severe VSL - The Reliability Coordinator failed to have Interpersonal Communications capability with one or more of the entities listed in Parts 1.1 and 1.2.</p> <p>The RCSDT has applied the VSL to the Severe column because not having Interpersonal Communication capability with any entity is detrimental to reliability.</p>

Organization	Yes or No	Question 6 Comment
		<p>No change made.</p> <p>6. VSL for Requirement R9</p> <p>a. For consistency with the requirement language, ReliabilityFirst recommends adding the words “at least on a monthly basis” to the Lower, Moderate and High VSLs and adding the words “if the test was unsuccessful” to the end of the Lower, Moderate and High VSLs.</p> <p>Listed below is an example of the Lower VSL.</p> <p>i. The responsible entity tested the Alternative Interpersonal Communications capability at least once per calendar month but failed to initiate action to repair or designate a replacement Alternative Interpersonal Communications in more than 2 hours and less than or equal to 4 hours if the test was unsuccessful.</p> <p>The RCSDT notes the requirement requires the entity to perform the test each month. If the test is not performed during each month, there is no other option for gradating the severity of the violation. No change made.</p> <p>7. VSL for Requirement R10</p> <p>a. ReliabilityFirst provided alternate language for R10 in the comments listed above. If the alternated language is not incorporated, ReliabilityFirst recommends the following language for the Lower VSL. Similar language could be used for the Moderate, High and Severe VSLs as well.</p> <p>i. The responsible entity failed to notify entities as identified in Requirements R1 through R6 more than 60 minutes but less than or equal to 70 minutes of the detection of a failure of its Interpersonal Communications capabilities.</p> <p>b. If the alternate language for R10, in the comments listed above, is incorporated, ReliabilityFirst recommends the following language for the Lower VSL. Similar language could be used for the Moderate, High and Severe VSLs as well.</p> <p>i. The responsible entity failed to notify entities as identified in Requirements R1</p>

Organization	Yes or No	Question 6 Comment
		<p>through R6 more than 30 minutes but less than or equal to 740 minutes of the detection of a failure of its Interpersonal Communications capabilities</p> <p>c. For Moderate VSL (the VSL after the OR statement), ReliabilityFirst recommends using a percentage rather than the “least one, but not all” statement. For example, if there is say 100 impacted entities and the applicable entity only notify 1, they would only fall under the Moderate. In another scenario there is say 100 impacted entities and the applicable entity only notified 99, they would also fall under the Moderate as well. The use of percentages will help even this out.</p> <p>The RCSDT made conforming changes to the VSLs to address a number of comments and changes to the requirements.</p> <p>8. VSL for Requirement R11</p> <p>a. For consistency with the requirement language, ReliabilityFirst recommends the following language:</p> <p>i. The responsible entity that experiences a failure of any of its Interpersonal Communication capabilities failed to consult with their Transmission Operator or Balancing Authority as applicable to determine a mutually agreeable time to restore the Interpersonal Communication capability.</p> <p>Comments on COM-002-3</p> <p>The RCSDT has made conforming changes to the VSLs due to comments received about the R11.</p> <p>1. Requirement R1</p> <p>a. Based on ReliabilityFirst suggested change to the definition of “Reliability Directive” as noted in Question 5, ReliabilityFirst recommends deleting Requirement R1. Based on the suggested definition, any communication initiated, where an action by the recipient is required, is considered a “Reliability Directive.” Thus, there would no longer be a need for responsible entity to identify the action as a</p>

Organization	Yes or No	Question 6 Comment
		<p>“Reliability Directive” to the recipient.</p> <p>In coordination with the RTOSDT work on the TOP family of standards, the RCSDT does not propose that the Reliability Directive definition contain a requirement for action to be taken. Therefore, R1 is retained as a requirement for the “action” to be taken. No change made.</p> <p>2. VSL for Requirement R3</p> <p>a. For consistency with the requirement language, ReliabilityFirst recommends the following language:</p> <p>The RCSDT has followed the VSL Guidelines in properly assigning the VSL as binary. No change made.</p> <p><i>i. The responsible entity issued a Reliability Directive, but failed to confirm that the response from the recipient of the Reliability Directive (in accordance with Requirement R2) was accurate.</i></p> <p>Comments on IRO-001-3</p> <p>1. Requirement R1</p> <p>a. ReliabilityFirst seeks further clarity on why Requirement R1 only requires the Reliability Coordinator to have the “authority to act” rather than requiring the Reliability Coordinator to actually “take action” to prevent identified events that result in an Emergency or Adverse Reliability Impacts. Having the “authority to act” does not inherently require the Reliability Coordinator to take action, if appropriate.</p> <p>The RCSDT proposes that R1 reflects the Purpose of IRO-001-3. No change made.</p> <p>b. ReliabilityFirst seeks further clarity on the language “to prevent identified events.” If the event was already identified, how can the Reliability Coordinator act to prevent it? ReliabilityFirst recommends adding the word “potential” in between the words “prevent” and “identified.”</p> <p>The context of “identified” is when a set of system conditions is recognized that</p>

Organization	Yes or No	Question 6 Comment
		<p>could lead to an Emergency or Adverse Reliability Impact, which may require action. See standards IRO-008 and IRO-009. No change made.</p> <p>2. Requirement R3</p> <p>a. There is no time qualifier specified in Requirement R3 dealing with the timeframe in which the applicable entity has to inform its Reliability Coordinator of its inability to perform as directed in accordance with Requirement R2. Without a time qualifier, Requirement R3 is open ended and could cause issues if the applicable entity does not inform its Reliability Coordinator upon recognition of its inability to perform as directed in a timely manner. ReliabilityFirst recommends the following language for Requirement R3:</p> <p><i>i. Each Transmission Operator, Balancing Authority, Generator Operator, and Distribution Provider shall inform its Reliability Coordinator within 30 minutes upon recognition of its inability to perform as directed in accordance with Requirement R2.</i></p> <p>The RCSDT proposes the term “upon recognition of its inability to perform” does not require a time limit. No change made.</p> <p>The Measure M3, has been updated to include the phrase “upon recognition of its inability” to be consistent with R3.</p> <p>3. VSL for Requirement R1</p> <p>a. Requirement R1 requires the Reliability Coordinator to “...have the authority to act” - and the VSL does not reflect this language. ReliabilityFirst had questioned why Requirement R1, does not specifically require the RC to take action or direct actions in a comment submitted under Requirement R1. If the SDT does not change the language in Requirement R1, ReliabilityFirst recommends the following language:</p> <p><i>i. The Reliability Coordinator failed to have the authority to take action or direct actions, to prevent an identified event that resulted in an Adverse Reliability Impact.</i></p> <p>The RCSDT made conforming changes to the VSL.</p>

Organization	Yes or No	Question 6 Comment
		<p>4. VSL for Requirement R2</p> <p>a. For the High VSL, the words “fully comply” are ambiguous and open to interpretation. ReliabilityFirst recommends only having a Severe VSL.</p> <p>b. The Severe VSL states “directive” while Requirement R2 states “direction.” To be consistent, ReliabilityFirst recommends the following language:</p> <p><i>i. “The Responsible Entity failed to comply with its Reliability Coordinator’s direction”</i></p> <p>The RCSDT thanks you for your comment and has made conforming changes to the VSL.</p>
<p>Response: See response above.</p>		
<p>City of Vero Beach</p>		<p>In the definition of Interpersonal Communication, the use of the word “medium” is ambiguous. Suggestions for alternatives: “system”, “channel.”</p> <p>The RCSDT proposes the term “medium” to allow entities flexibility on how they communicate and meet compliance with the requirements. No change made.</p> <p>COM-001-2, R1 and R3, the phrase: “have Interpersonal Communications capabilities”, what if the communication system fails?</p> <p>The RCSDT proposes that AIC is in force at that time. No change made.</p> <p>Is that an immediate non-compliance (especially R3.3 and R3.4 which do not require a redundant system). Suggest using EOP-008 type of language to allow restoration of failed equipment without non-compliance.</p> <p>The RCSDT reviewed both EOP-008-0 and EOP-008-1, which is subject to future enforcement. In either version, the team believes there is no need to add additional language to the standard. No change made.</p> <p>The RCSDT believes that prescribing a device or medium would limit an entity; therefore, “capability” is used to avoid being prescriptive and to provide flexibility. This was not intended by the drafting team. The intent is to give the entity the</p>

Organization	Yes or No	Question 6 Comment
		<p>flexibility in meeting the requirement. A loss of Interpersonal Communication capability is covered by R10, notification of Interpersonal Communication capability failure. No change made.</p> <p>COM-001-2, R9 - "Each ... shall test its Alternative Interpersonal Communications capability", suggest adding the phrase "to each entity for which Alternative Interpersonal Communications is required" to add clarity. In addition, the type of testing is unclear and ambiguous.</p> <p>The RCSDT proposes that R9 correctly identifies and provides clarity for the entities required to have Alternative Interpersonal Communication capability. No change made.</p> <p>There is also ambiguity in the terms "direct", "directive", "direction" and "Reliability Directive." The SDT may want to consider using the terms "instruct" and "instruction" in place of "direct," "directive," or "direction" to more clearly distinguish from a Reliability Directive.</p> <p>The RCSDT feels the use of direct and directed is consistent with the purpose and application of those terms in other standards and is consistent with previous postings. No change made.</p>
<p>Response: See response above.</p>		
<p>NV Energy</p>		<p>The meaning of R9 is open to some interpretation. It states that if the monthly test is unsuccessful, the entity shall "initiate action to repair or designate a replacement" AIC within 2 hours. The meaning of this is unclear in several ways:</p> <p>First, does "initiate action" apply to the remainder of the sentence or just to the "repair" option?</p> <p>Second, what constitutes initiation of action?</p> <p>Is it the intent of the SDT that the alternate interpersonal communications be</p>

Organization	Yes or No	Question 6 Comment
		<p>restored within a 2-hour limit?</p> <p>If so, the words do not clearly state that, and it seems an impossible task to ensure no more than 2-hr outage to an alternate communications medium. I am voting affirmative under the interpretation that one must only "initiate" the repair or "initiate" the designation of a replacement option within this tight 2-hour limit.</p>
<p>Response: The requirement is to initiate repair or designate an Alternative Interpersonal Communication capability within two hours. The requirement is NOT to have the repair completed within two hours. The requirement recognizes that the entity may use its Alternative Interpersonal Communication capability now as its Interpersonal Communication capability; and then, if it decides to do so, designate another, if you may, "new" Alternative Interpersonal Communication capability. This is not required, but is an option that the entity can consider. The entity may already have a maintenance and repair agreement in place that will respond and repair the failed capability. No change made.</p>		
<p>Midwest Independent Transmission System Operator</p>		<p>COM-001-2, R2 and R6:</p> <p>MISO requests clarification as to whether the designation of Interpersonal Communications and Alternative Interpersonal Communications methods by Responsible Entities must be formally documented and/or agreed upon with those entities with which communications capability must be established.</p> <p>The RCSDT has provided flexibility to the responsible entity with regard to implementation and compliance. Please note that Interpersonal Communication is a "shall have" and Alternative Interpersonal Communication capability is "designate." Please refer to the Measures for suitable evidence, which may be used to support compliance with the requirement. No change made.</p> <p>COM-001-2, R9:</p> <p>MISO suggests that the designation of Alternative Interpersonal Communications methods should not require formal documentation and may be agreed upon (when necessary) informally with those entities with which communications capability must be established in the event of an unsuccessful test of its Alternative Interpersonal</p>

Organization	Yes or No	Question 6 Comment
		<p>Communications capability.</p> <p>The RCSDT has provided flexibility to the responsible entity with regard to implementation and compliance. Please note that Interpersonal Communication is a “shall have” and Alternative Interpersonal Communication capability is “designate.” Please refer to the Measures for suitable evidence, which may be used to support compliance with the requirement. No change made.</p> <p>COM-001-2, Requirement R10:</p> <p>MISO requests clarification as to whether “impacted entities” refers to those entities with which the Responsible Entity must have Interpersonal Communications and Alternative Interpersonal Communications capability.</p> <p>Further, MISO requests clarification as to whether the notification required by R10 must be made using the Alternative Interpersonal Communications method selected by the Responsible Entity.</p> <p>The word “impacted” was removed in previous postings. For further clarification, the RCSDT has modified M10 to remove the word “impacted” to be consistent with R10. For additional clarity, the RCSDT also changed the phrase in R10 and M10, “R1 through R6” to “R1, R3, and R5,” to clarify that it applies to the capabilities with the RC, the TOP, and the BA.</p> <p>With respect to the method used by the Responsible Entity, the standard does not provide the “how” or any prescriptive method for accomplishing the requirement. No change made.</p> <p>COM-002-3, R1 - R3:</p> <p>MISO respectfully submits that, while it appreciates the distinction in responsibilities proposed in the new COM-002-3 and acknowledges that such distinction is beneficial, these requirements increase compliance risk and potential penalty liability without attendant benefit to the reliability of the Bulk Electric System. MISO respectfully suggests that Requirements 2 and 3 be converted into sub-requirements</p>

Organization	Yes or No	Question 6 Comment
		<p>as follows:</p> <p><i>R1. When a Reliability Coordinator, Transmission Operator or Balancing Authority requires actions to be executed as a Reliability Directive, the Reliability Coordinator, Transmission Operator or Balancing Authority shall identify the action as a Reliability Directive to the recipient. [Violation Risk Factor: High][Time Horizon: Real-Time]</i></p> <p><i>R1.1. When the Reliability Coordinator, Transmission Operator or Balancing Authority identifies a stated action as a Reliability Directive, the receiving Balancing Authority, Transmission Operator, Generator Operator, and Distribution Provider shall repeat, restate, rephrase or recapitulate the Reliability Directive to the issuing Reliability Coordinator, Transmission Operator or Balancing Authority. [Violation Risk Factor: High][Time Horizon: Real-Time]</i></p> <p><i>R1.2. When the Reliability Coordinator, Transmission Operator, and Balancing Authority that issues a Reliability Directive receives a response from the receiving Balancing Authority, Transmission Operator, Generator Operator, and Distribution Provider, it shall then either [Violation Risk Factor: High][Time Horizon: Real-Time]:</i></p> <ul style="list-style-type: none"> -Confirm that the response from the recipient of the Reliability Directive (in accordance with Requirement R2) was accurate, or -Reissue the Reliability Directive to resolve any misunderstandings. <p>The RCSDT contends the requirements in the proposed standard have been constructed in accordance with standard development guidelines to have only one performance per requirement. The suggested change places three independent actions within one requirement. No change made.</p>
<p>Response: See response above.</p>		
Texas Reliability Entity		<p>(1) There are numerous errors in the Mapping Document in referencing the current version of the standard and requirement. Specifically, referencing IRO-001-2 where it appears that the document should reference standard IRO-001-3. In addition, the</p>

Organization	Yes or No	Question 6 Comment
		<p>notes on page 2 of COM-002-3 are incorrect.</p> <p>The RCSDT thanks you for your comments and has made conforming corrections.</p> <p>(2) In the VRF/VSL Justification document, there are numerous errors in referring to standard versions and requirements.</p> <p>The RCSDT thanks you for your comments and has made conforming corrections.</p> <p>(3) In IRO-001-3, R1 - What is an “identified event,” and who “identifies” an event that requires compliance with this requirement R1? An RC may choose not to “identify” an event, such as a limit violation, and run the risk of causing or exacerbating an emergency. If the RC does not “identify” the event, it may become an actual event and then fall within the standard.</p> <p>The context of “identified” is when a set of system conditions are recognized that could lead to an Emergency or Adverse Reliability Impact, which may require action. See standards IRO-008 and IRO-009. The RC named in R1 is the entity that identifies the even that requires compliance. No change made.</p> <p>(4) In the VSL for IRO-001-3, R1, there should be language in the VSL to capture the term “Emergency,” which was added in the Requirement. The High VSL for R2 needs to be fixed.</p> <p>The RCSDT thanks you for your comments and has made conforming corrections. The “N/A” in R2 of COM-002-3 was removed.</p> <p>(5) In IRO-001-3, R1, remove the “s” in the phrase “Adverse Reliability Impacts.”</p> <p>The RCSDT thanks you for your comments and has made conforming corrections.</p> <p>(6) Referring to the Implementation Plan for IRO-001 - There is a different list in the Implementation Plan (R2, R4, R5, R6, R7, R9) than the Revision History of the Standard (R2, R4, R5, R6, R8). Where is the retirement of R1 shown?</p> <p>The RCSDT thanks you for your comments and has made conforming corrections.</p> <p>(7) Referring to COM-001-2: Measure 7, the word “that” is inadvertently repeated in</p>

Organization	Yes or No	Question 6 Comment
		<p>the first sentence.</p> <p>COM-001-2, M8: The RCSDT agrees and the language in Measure M8 has been changed to delete the additional “that.”</p> <p>(8) In COM-001-2, Measure 9, is “at least on a monthly basis” to be interpreted differently than “at least once per calendar month” as stated in the requirement?</p> <p>The RCSDT thanks you for your comments and has made conforming corrections to Measure M9 and the R9 VSL.</p> <p>(9) In COM-001-2, there is a “Measure 12” bullet that should be removed.</p> <p>The RCSDT thanks you for your comments and has made conforming corrections.</p> <p>(10) Referring to COM-002-3: Electronic directives (which may be issued over many different types of electronic communication channels) are increasingly necessary to manage the modern, dynamic Bulk Power System (generation and transmission) on a real-time basis. The effective use of electronic directives is undermined by this proposed Standard in its current form. This draft standard, in conjunction with other standards that refer to directives, appears to require that directives (at least Reliability Directives) be given verbally. The failure of the NERC standards to address electronic directives may cause significant manpower issues for BAs with large portfolios of generation to manage.</p> <p>The RCSDT proposes that COM-001-2 and COM-002-3, as written, allows flexibility for an entity to communicate where two or more individuals are required for communication to occur and they interact, consult or exchange information. Compliance is contained in the Measures and an entity must determine if its communication method can demonstrate compliance with the requirements. No change made.</p> <p>(11) In the VSL for COM-001-2 R4, a reference to Part 4.3 should be added.</p> <p>The RCSDT thanks you for your comments and has made conforming corrections.</p>

Organization	Yes or No	Question 6 Comment
		<p>(12) In IRO-001-3, Part 1.3 Data Retention, the reference in the first bullet to “Electric reliability Organization” is incorrect. We think it should say “Reliability Coordinator” instead.</p> <p>The other references to entities and to Requirements in this Part 1.3 also appear to be incorrect and need to be updated and corrected.</p> <p>The RCSDT thanks you for your comment and has made conforming changes.</p> <p>(13) Referring to COM-001-2, the prior version of this standard included Requirement R5: “Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall have written operating instructions and procedures to enable continued operation of the system during the loss of telecommunications facilities.” This Requirement has been removed from the present draft of COM-001-2.</p> <p>The RCSDT removed this requirement because it did not have a reliability benefit. No change made.</p> <p>The mapping document seems to suggest that this Requirement was moved to EOP-008, but it is not there. We are concerned that removal of this Requirement will result in a reduction in the level of BES reliability and introduce a potential reliability gap.</p> <p>As stated in the Implementation Plan, the RCSDT proposes retiring COM-001-1, R5 as it is redundant with EOP-008-0, R1 as well as replacement EOP-008-1, R1. No change made.</p>
<p>Response: See response above.</p>		
<p>Hydro One Networks Inc.</p>		<p>(1) The proposed implementation plan conflicts with Ontario regulatory practice respecting the effective date of the standard. It is suggested that this conflict be removed by appending to the implementation plan wording, after “applicable regulatory approval” in the Effective Dates Section A5 on P. 4 of the draft standard</p>

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		<p>COM-001, COM-002 and IRO-001, and on P. 2 of COM-001’s Implementation Plan and P. 1 of COM-002’s and IRO-001’s Implementation Plans, to the following effect:”, or as otherwise made effective pursuant to the laws applicable to such ERO governmental authorities.”</p> <p>The RCSDT is uncertain where the conflict exists. The standard IRO-001 uses the term “after applicable” and the others “following applicable.” The RCSDT has updated the standards to use the most current effective date language.</p> <p>(2) COM-001: Measure M9: - “monthly basis.” Suggest changing “monthly basis” to “at least once per calendar month” to be consistent the wording in R9.</p> <p>The RCSDT thanks you for your comment and has made conforming changes the Measure M9 and the R9 VSL.</p> <p>(3) IRO-001: Measures M1, M2, M3 - The types of evidence are listed in paragraph form. This is not consistent with presentation style in COM-001-2 Measures, where evidence is listed in bullet format. Suggest using bullet form for consistency.</p> <p>The RCSDT appreciates your comments and has made all the Measures bullet form in COM-001-2, but not in COM-002-3 and IRO-001-3.</p> <p>(4) IRO-001, Data Retention Section:</p> <p>i. The retention requirements do not reflect the revised requirements. For example: the Electric Reliability Organization is no longer a responsible entity; the Reliability Coordinator should replace the ERO for keeping data for R1; Transmission Operator, Balancing Authority, Generator Operator and Distribution Provider should replace the Reliability Coordinator for keeping data for R2; and there is no R4/M4.</p> <p>ii. Section 1.3, second paragraph:</p> <p>“The Reliability Coordinator, Transmission Operator, Balancing Authority, Generator Operator, or Distribution Provider... shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to</p>

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		<p>retain specific evidence for a longer period of time as part of an investigation:"</p> <p>The word "or" between Generator Operator and Distribution Provider should be changed to "and."</p> <p>The RCSDT thanks you for your comment and has made conforming changes to the Data Retention section.</p>
<p>Response: See response above.</p>		
<p>New York Independent System Operator</p>		<p>COM-001</p> <p>The drafting team has complicated the requirements by having different requirements between RC/TOP/BA and other entities such as GOP/LSE/DP. The proposal is for redundancy to be required only between RC/TOP/BA. The requirement should be simplified to require all identified entities to have plans for loss of primary communication channels. This could include third parties as a communication channel.</p> <p>The RCSDT refers the Order No. 693 in Paragraph 508 to clarify the reason the DP and GOP are not required to have Alternative Interpersonal Communication and is as follows: "(1) expands the applicability to include Generator Operators and Distribution Providers and includes Requirements for their telecommunications facilities; (2) identifies specific requirements for telecommunications facilities for use in normal and emergency conditions that reflect the roles of the applicable entities and their impact on Reliable Operation and (3) includes adequate flexibility for compliance with the Reliability Standard, adoption of new technologies and cost-effective solutions." In addition, R11 requires the DP and GOP to consult with its BA and TOP to determine a mutually agreeable action for restoration. No change made.</p> <p>COM-002</p> <p>The drafting team added a requirement to identify a Reliability Directive is being initiated during an emergency to track 3-part communication for compliance</p>

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		<p>purposes. This will change and complicate the communication protocols between normal and emergency operations simply to simplify compliance assessments. The NYISO is asking for clarification that an entity may identify Reliability Directives as a category of communications to be communicated through procedures and training; and will not require a different communication protocol between normal and emergency operations. Affective communications can only be achieved through consistent processes for all conditions. Compliance assessments should be made on when we are in an emergency or not, and not on how the dialogue was initiated.</p> <p>The RCSDT believes the standard allows for this condition, and the method of implementation is up to the entity. No change made.</p>
<p>Response: See response above.</p>		

END OF REPORT