

A. Introduction

1. **Title:** Operating Personnel Communications Protocols
2. **Number:** COM-002-4
3. **Purpose:** To improve communications for the issuance of Operating Instructions with predefined communications protocols to reduce the possibility of miscommunication that could lead to action or inaction harmful to the reliability of the Bulk Electric System (BES).
4. **Applicability:**
 - 4.1. **Functional Entities**
 - 4.1.1 Balancing Authority
 - 4.1.2 Distribution Provider
 - 4.1.3 Reliability Coordinator
 - 4.1.4 Transmission Operator
 - 4.1.5 Generator Operator
5. **Effective Date:** The standard shall become effective on the first day of the first calendar quarter that is twelve (12) months after the date that the standard is approved by an applicable governmental authority or as otherwise provided for in a jurisdiction where approval by an applicable governmental authority is required for a standard to go into effect. Where approval by an applicable governmental authority is not required, the standard shall become effective on the first day of the first calendar quarter that is twelve (12) months after the date the standard is adopted by the NERC Board of Trustees or as otherwise provided for in that jurisdiction.

B. Requirements

- R1. Each Balancing Authority, Reliability Coordinator, and Transmission Operator shall develop documented communications protocols for its operating personnel that issue and receive Operating Instructions. The protocols shall, at a minimum: *[Violation Risk Factor: Low][Time Horizon: Long-term Planning]*
 - 1.1. Require its operating personnel that issue and receive an oral or written Operating Instruction to use the English language, unless agreed to otherwise. An alternate language may be used for internal operations.
 - 1.2. Require its operating personnel that issue an oral two-party, person-to-person Operating Instruction to take one of the following actions:
 - Confirm the receiver's response if the repeated information is correct.
 - Reissue the Operating Instruction if the repeated information is incorrect or if requested by the receiver.

- Take an alternative action if a response is not received or if the Operating Instruction was not understood by the receiver.
- 1.3. Require its operating personnel that receive an oral two-party, person-to-person Operating Instruction to take one of the following actions:
 - Repeat, not necessarily verbatim, the Operating Instruction and receive confirmation from the issuer that the response was correct.
 - Request that the issuer reissue the Operating Instruction.
 - 1.4. Require its operating personnel that issue a written or oral single-party to multiple-party burst Operating Instruction to confirm or verify that the Operating Instruction was received by at least one receiver of the Operating Instruction.
 - 1.5. Specify the instances that require time identification when issuing an oral or written Operating Instruction and the format for that time identification.
 - 1.6. Specify the nomenclature for Transmission interface Elements and Transmission interface Facilities when issuing an oral or written Operating Instruction.
- R2.** Each Balancing Authority, Reliability Coordinator, and Transmission Operator shall conduct initial training for each of its operating personnel responsible for the Real-time operation of the interconnected Bulk Electric System on the documented communications protocols developed in Requirement R1 prior to that individual operator issuing an Operating Instruction. *[Violation Risk Factor: Low][Time Horizon: Long-term Planning]*
- R3.** Each Distribution Provider and Generator Operator shall conduct initial training for each of its operating personnel who can receive an oral two-party, person-to-person Operating Instruction prior to that individual operator receiving an oral two-party, person-to-person Operating Instruction to either: *[Violation Risk Factor: Low][Time Horizon: Long-term Planning]*
- Repeat, not necessarily verbatim, the Operating Instruction and receive confirmation from the issuer that the response was correct, or
 - Request that the issuer reissue the Operating Instruction.
- R4.** Each Balancing Authority, Reliability Coordinator, and Transmission Operator shall at least once every twelve (12) calendar months: *[Violation Risk Factor: Medium][Time Horizon: Operations Planning]*
- 4.1. Assess adherence to the documented communications protocols in Requirement R1 by its operating personnel that issue and receive Operating Instructions, provide feedback to those operating personnel and take corrective action, as deemed appropriate by the entity, to address deviations from the documented protocols.
 - 4.2. Assess the effectiveness of its documented communications protocols in Requirement R1 for its operating personnel that issue and receive Operating Instructions and modify its documented communication protocols, as necessary.

- R5.** Each Balancing Authority, Reliability Coordinator, and Transmission Operator that issues an oral two-party, person-to-person Operating Instruction during an Emergency, excluding written or oral single-party to multiple-party burst Operating Instructions, shall either: [*Violation Risk Factor: High*][*Time Horizon: Real-time Operations*]
- Confirm the receiver’s response if the repeated information is correct (in accordance with Requirement R6).
 - Reissue the Operating Instruction if the repeated information is incorrect or if requested by the receiver, or
 - Take an alternative action if a response is not received or if the Operating Instruction was not understood by the receiver.
- R6.** Each Balancing Authority, Distribution Provider, Generator Operator, and Transmission Operator that receives an oral two-party, person-to-person Operating Instruction during an Emergency, excluding written or oral single-party to multiple-party burst Operating Instructions, shall either: [*Violation Risk Factor: High*][*Time Horizon: Real-time Operations*]
- Repeat, not necessarily verbatim, the Operating Instruction and receive confirmation from the issuer that the response was correct, or
 - Request that the issuer reissue the Operating Instruction.
- R7.** Each Balancing Authority, Reliability Coordinator, and Transmission Operator that issues a written or oral single-party to multiple-party burst Operating Instruction during an Emergency shall confirm or verify that the Operating Instruction was received by at least one receiver of the Operating Instruction. [*Violation Risk Factor: High*][*Time Horizon: Real-time Operations*]

C. Measures

- M1.** Each Balancing Authority, Reliability Coordinator, and Transmission Operator shall provide its documented communications protocols developed for Requirement R1.
- M2.** Each Balancing Authority, Reliability Coordinator, and Transmission Operator shall provide its initial training records related to its documented communications protocols developed for Requirement R1 such as attendance logs, agendas, learning objectives, or course materials in fulfillment of Requirement R2.
- M3.** Each Distribution Provider and Generator Operator shall provide its initial training records for its operating personnel such as attendance logs, agendas, learning objectives, or course materials in fulfillment of Requirement R3.
- M4.** Each Balancing Authority, Reliability Coordinator, and Transmission Operator shall provide evidence of its assessments, including spreadsheets, logs or other evidence of feedback, findings of effectiveness and any changes made to its documented communications protocols developed for Requirement R1 in fulfillment of

Requirement R4. The entity shall provide, as part of its assessment, evidence of any corrective actions taken where an operating personnel's non-adherence to the protocols developed in Requirement R1 is the sole or partial cause of an Emergency and for all other instances where the entity determined that it was appropriate to take a corrective action to address deviations from the documented protocols developed in Requirement R1.

- M5.** Each Reliability Coordinator, Transmission Operator, and Balancing Authority that issued an oral two-party, person-to-person Operating Instruction during an Emergency, excluding oral single-party to multiple-party burst Operating Instructions, shall have evidence that the issuer either: 1) confirmed that the response from the recipient of the Operating Instruction was correct; 2) reissued the Operating Instruction if the repeated information was incorrect or if requested by the receiver; or 3) took an alternative action if a response was not received or if the Operating Instruction was not understood by the receiver. Such evidence could include, but is not limited to, dated and time-stamped voice recordings, or dated and time-stamped transcripts of voice recordings, or dated operator logs in fulfillment of Requirement R5.
- M6.** Each Balancing Authority, Distribution Provider, Generator Operator, and Transmission Operator that was the recipient of an oral two-party, person-to-person Operating Instruction during an Emergency, excluding oral single-party to multiple-party burst Operating Instructions, shall have evidence to show that the recipient either repeated, not necessarily verbatim, the Operating Instruction and received confirmation from the issuer that the response was correct, or requested that the issuer reissue the Operating Instruction in fulfillment of Requirement R6. Such evidence may include, but is not limited to, dated and time-stamped voice recordings (if the entity has such recordings), dated operator logs, an attestation from the issuer of the Operating Instruction, memos or transcripts.
- M7.** Each Balancing Authority, Reliability Coordinator and Transmission Operator that issued a written or oral single or multiple-party burst Operating Instruction during an Emergency shall provide evidence that the Operating Instruction was received by at least one receiver. Such evidence may include, but is not limited to, dated and time-stamped voice recordings (if the entity has such recordings), dated operator logs, electronic records, memos or transcripts.

D. Compliance

1. Compliance Monitoring Process

1.1. Compliance Enforcement Authority

As defined in the NERC Rules of Procedure, "Compliance Enforcement Authority" means NERC or the Regional Entity in their respective roles of monitoring and enforcing compliance with the NERC Reliability Standards.

1.2. 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.

Each Balancing Authority, Distribution Provider, Generator Operator, Reliability Coordinator, and Transmission Operator shall each keep data or evidence for each applicable Requirement for the current calendar year and one previous calendar year, with the exception of voice recordings which shall be retained for a minimum of 90 calendar days, unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

If a Balancing Authority, Distribution Provider, Generator Operator, Reliability Coordinator, or Transmission Operator is found non-compliant, it shall keep information related to the non-compliance until mitigation is complete and approved or for the time period specified above, whichever is longer.

The Compliance Enforcement Authority shall keep the last audit records and all requested and submitted subsequent audit records.

Compliance Monitoring and Assessment Processes

Compliance Audit

Self-Certification

Spot Checking

Compliance Investigation

Self-Reporting

Complaint

1.3. Additional Compliance Information

None

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R #	Time Horizon	VRF	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
R1	Long-term Planning	Low	<p>The responsible entity did not specify the instances that require time identification when issuing an oral or written Operating Instruction and the format for that time identification, as required in Requirement R1, Part 1.5</p> <p>OR</p> <p>The responsible entity did not specify the nomenclature for Transmission interface Elements and Transmission interface Facilities when issuing an oral or written Operating Instruction, as required in Requirement R1, Part 1.6.</p>	<p>The responsible entity did not require the issuer and receiver of an oral or written Operating Instruction to use the English language, unless agreed to otherwise, as required in Requirement R1, Part 1.1. An alternate language may be used for internal operations.</p>	<p>The responsible entity did not include Requirement R1, Part 1.4 in its documented communication protocols.</p>	<p>The responsible entity did not include Requirement R1, Part 1.2 in its documented communications protocols</p> <p>OR</p> <p>The responsible entity did not include Requirement R1, Part 1.3 in its documented communications protocols</p> <p>OR</p> <p>The responsible entity did not develop any documented communications protocols as required in Requirement R1.</p>

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R #	Time Horizon	VRF	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
R2	Long-term Planning	Low	N/A	N/A	An individual operator responsible for the Real-time operation of the interconnected Bulk Electric System at the responsible entity issued an Operating Instruction, prior to being trained on the documented communications protocols developed in Requirement R1.	An individual operator responsible for the Real-time operation of the interconnected Bulk Electric System at the responsible entity issued an Operating Instruction during an Emergency prior to being trained on the documented communications protocols developed in Requirement R1.
R3	Long-term Planning	Low	N/A	N/A	An individual operator at the responsible entity received an Operating Instruction prior to being trained.	An individual operator at the responsible entity received an Operating Instruction during an Emergency prior to being trained.

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R #	Time Horizon	VRF	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
R4	Operations Planning	Medium	<p>The responsible entity assessed adherence to the documented communications protocols in Requirements R1 by its operating personnel that issue and receive Operating Instructions and provided feedback to those operating personnel and took corrective action, as appropriate</p> <p>AND</p> <p>The responsible entity assessed the effectiveness of its documented communications protocols in Requirement R1 for its operating personnel that issue and receive Operating Instructions and modified its documented communication</p>	<p>The responsible entity assessed adherence to the documented communications protocols in Requirement R1 by its operating personnel that issue and receive Operating Instructions, but did not provide feedback to those operating personnel</p> <p>OR</p> <p>The responsible entity assessed adherence to the documented communications protocols in Requirements R1 by its operating personnel that issue and receive Operating Instructions and provided feedback to those operating personnel but did not take corrective action, as appropriate</p> <p>OR</p> <p>The responsible entity assessed the effectiveness of its documented communications protocols</p>	<p>The responsible entity did not assess adherence to the documented communications protocols in Requirements R1 by its operating personnel that issue and receive Operating Instructions</p> <p>OR</p> <p>The responsible entity did not assess the effectiveness of its documented communications protocols in Requirement R1 for its operating personnel that issue and receive Operating Instructions.</p>	<p>The responsible entity did not assess adherence to the documented communications protocols in Requirements R1 by its operating personnel that issue and receive Operating Instructions</p> <p>AND</p> <p>The responsible entity did not assess the effectiveness of its documented communications protocols in Requirement R1 for its operating personnel that issue and receive Operating Instructions.</p>

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R #	Time Horizon	VRF	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
			<p>protocols, as necessary</p> <p>AND</p> <p>The responsible entity exceeded twelve (12) calendar months between assessments.</p>	<p>in Requirement R1 for its operating personnel that issue and receive Operating Instructions, but did not modify its documented communication protocols, as necessary.</p>		

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			Lower VSL	Moderate VSL	High VSL	Severe VSL
R5	Real-time Operations	High	N/A	<p>The responsible entity that issued an Operating Instruction during an Emergency did not take one of the following actions:</p> <ul style="list-style-type: none"> Confirmed the receiver’s response if the repeated information was correct (in accordance with Requirement R6). Reissued the Operating Instruction if the repeated information was incorrect or if requested by the receiver. Took an alternative action if a response was not received or if the Operating Instruction was not understood by the receiver. 	N/A	<p>The responsible entity that issued an Operating Instruction during an Emergency did not take one of the following actions:</p> <ul style="list-style-type: none"> Confirmed the receiver’s response if the repeated information was correct (in accordance with Requirement R6). Reissued the Operating Instruction if the repeated information was incorrect or if requested by the receiver. Took an alternative action if a response was not received or if the Operating Instruction was not understood by the receiver. <p>AND</p> <p>Instability, uncontrolled separation, or cascading failures occurred as a result.</p>

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			Lower VSL	Moderate VSL	High VSL	Severe VSL
R6	Real-time Operations	High	N/A	The responsible entity did not repeat, not necessarily verbatim, the Operating Instruction during an Emergency and receive confirmation from the issuer that the response was correct, or request that the issuer reissue the Operating Instruction when receiving an Operating Instruction.	N/A	The responsible entity did not repeat, not necessarily verbatim, the Operating Instruction during an Emergency and receive confirmation from the issuer that the response was correct, or request that the issuer reissue the Operating Instruction when receiving an Operating Instruction AND Instability, uncontrolled separation, or cascading failures occurred as a result.
R7	Real-time Operations	High	N/A	The responsible entity that that issued a written or oral single-party to multiple-party burst Operating Instruction during an Emergency did not confirm or verify that the Operating Instruction was received by at least one receiver of the Operating Instruction.	N/A	The responsible entity that that issued a written or oral single-party to multiple-party burst Operating Instruction during an Emergency did not confirm or verify that the Operating Instruction was received by at least one receiver of the Operating Instruction AND Instability, uncontrolled separation, or cascading failures occurred as a result.

E. Regional Variances

None

Version History

Version	Date	Action	Change Tracking
0	April 1, 2005	Effective Date	New
0	August 8, 2005	Removed “Proposed” from Effective Date	Errata
1	February 7, 2006	Adopted by Board of Trustees	Added measures and compliance elements
2	November 1, 2006	Adopted by Board of Trustees	Revised in accordance with SAR for Project 2006-06, Reliability Coordination (RC SDT). Retired R1, R1.1, M1, M2 and updated the compliance monitoring information. Replaced R2 with new R1, R2 and R3.
2a	February 9, 2012	Interpretation of R2 adopted by Board of Trustees	Project 2009-22
3	November 7, 2012	Adopted by Board of Trustees	
4	May 6, 2014	Adopted by Board of Trustees	
4	April 16, 2015	FERC Order issued approving COM-002-4	