

Standard Development Roadmap

This section is maintained by the drafting team during the development of the standard and will be removed when the standard becomes effective.

Development Steps Completed:

1. The Standards Committee (SC) approved the Standard Authorization Request (SAR) for posting on March 1, 2007.
2. The SAR was posted for comment from March 19 through April 17, 2007.
3. The SC sought SAR drafting team nominations April 18 through May 2, 2007.
4. The SAR drafting team posted reply comments to industry comments received on the first posting SAR on June 8, 2007
5. Standard drafting team appointed by SC Executive Committee on June 28, 2007
6. Version 1 draft of Standard posted November 2009 for Informal Comments closed January 15 2010.
7. Version 2 draft of Standard posted May 2012 for Formal Comments, Initial Ballot closed June 20 2012.
8. Version 3 draft of Standard posted August 2012 for Formal Comments, Initial Ballot closed September 20 2012.
- 7.

Description of Current Draft:

This is the ~~third~~ fourth draft of a new standard requiring the use of standardized communication protocols during normal and emergency operations to improve situational awareness and shorten response time. The drafting team requests posting for a 30-day concurrent Formal Comment period and Ballot.

Future Development Plan:

Anticipated Actions	Anticipated Date
1. Drafting team considers comments, makes conforming changes, and requests SC approval to proceed to pre-ballot comment period.	July 2012
2. Second Ballot of Standards.	August 2012
3. Successive Ballot of Standards	September 2012
<u>1. Second Successive Ballot of Standards</u>	<u>October November 2012</u>

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<u>4.2.</u> Recirculation ballot of standards.	<u>January</u> October 2012 <u>2013</u>
<u>5.3.</u> Board adopts standards.	November <u>February</u> 2012 <u>2013</u>

Definitions of Terms Used in Standard

This section includes all newly defined or revised terms used in the proposed standard. Terms already defined in the Reliability Standards Glossary of Terms are not repeated here. New or revised definitions listed below become approved when the proposed standard is approved. When the standard becomes effective, these defined terms will be removed from the individual standard and added to the Glossary.

When using terms or phrases contained in the Reliability Standards Glossary of Terms for communications it should be cited as the source. When used in written communications, terms or phrases contained in the Reliability Standards Glossary of Terms are capitalized.

Operating Instruction — A Command ~~from~~ by a System Operator of a Reliability Coordinator, or of a Transmission Operator, or of a Balancing Authority, where the recipient of the command is expected to act, to change or preserve the state, status, output, or input of an Element of the Bulk Electric System or Facility of the Bulk Electric System. Discussions of general information and of potential options or alternatives to resolve BES operating concerns are not commands and are not considered Operating Instructions.

A. Introduction

1. **Title:** Operating Personnel Communications Protocols
2. **Number:** COM-003-1
3. **Purpose:** To provide System Operators uniform communications protocols that reduce the possibility of miscommunication that could lead to action or inaction harmful to the reliability of BES.

4. **Applicability:**

- 4.1. **Functional Entities**

- 4.1.1 Balancing Authority
 - 4.1.2 Distribution Provider
 - 4.1.3 Generator Operator
 - 4.1.4 Reliability Coordinator
 - 4.1.5 Transmission Operator

5. **(Proposed) Effective Date:** First day of first calendar quarter, twelve (12) calendar months following applicable regulatory approval; or, in those jurisdictions where no regulatory approval is required, the first day of the first calendar quarter twelve (12) calendar months from the date of Board of Trustee adoption.

6. **Background:**

The SDT has incorporated within this standard a recognition that these requirements should not focus on individual instances of failure as a sole basis for violating the standard. In particular, the SDT has incorporated an approach to empower and enable the industry to identify, assess, and correct deficiencies in the implementation of certain requirements. The intent is to change the basis of a violation in those requirements so that they are not focused on whether there is a deficiency, but on identifying, assessing, and correcting deficiencies. It is presented in those requirements by modifying “implement” as follows:

Each ... shall implement, in a manner that identifies, assesses, and corrects deficiencies, . . .

The term *documented communication protocols* refers to a set of required protocols specific to the Functional Entity. This term does not imply any particular naming or approval structure beyond what is stated in the requirements. An entity should include as much as it believes necessary in their documented protocols, but they must address all of the applicable parts of the Requirement. The documented protocols themselves are not required to include the “. . . identifies, assesses, and corrects deficiencies, . . .” elements described in the preceding paragraph, as those aspects are related to the manner of implementation of the documented protocols and could be accomplished through other controls or compliance management activities.

5. _____

B. Requirements

- R1.** Each Balancing Authority, Reliability Coordinator, and Transmission Operator shall implement, in a manner that identifies, assesses and corrects deficiencies, have documented communication protocols for Operating Instructions between functional entities that ~~incorporate~~ include the following: [*Violation Risk Factor: Medium Low*] [*Time Horizon: Long-term Planning*]
- 1.1.** Use of the English language when issuing or responding to an oral or written Operating Instruction ~~between functional entities~~, unless another language is mandated by law or regulation. ~~Transmission Operators and Balancing Authorities may use an alternate language for internal operations.~~
 - 1.2.** Use of the 24-hour clock format when referring to clock times when issuing an oral or written Operating Instruction.
 - 1.3.** Use of the time, the time zone where the action will occur and indication of whether the time is daylight saving time or standard time When issuing an oral or written Operating Instruction that refers to clock times between ~~functional entities~~ Entities in different time zones, ~~when referring to clock times include the time, the time zone where the action will occur and indicate whether the time is daylight saving time or standard time.~~
 - 1.4.** Use of the name specified by the owner(s) for each Transmission interface Element or Transmission interface Facility When referring to a Transmission interface Element or a Transmission interface Facility ~~(when issuing)~~ in an oral or written Operating Instruction ~~between functional entities, use the name specified by the owner(s) for that Transmission interface Element or Transmission interface Facility~~, unless another name is mutually agreed to by the ~~functional entities~~.
 - 1.5.** Use of alpha-numeric clarifiers when issuing an oral Operating Instruction for Facilities and Elements in instances where the nomenclature of Facilities or Elements is in alpha-numeric format (~~e.g. (for example)~~ if an entity designated a circuit breaker "One two(12)Bravo" (12B). ~~One two Bravo~~ would need alpha-numeric clarifiers if used in an oral Operating Instruction)
 - 1.6.** When issuing an oral two party, person-to-person Operating Instruction, require the issuer to:
 - Confirm that the response from the recipient of the Operating Instruction was accurate, or
 - Reissue the Operating Instruction to resolve a misunderstanding.
 - 1.7.** When receiving an oral two party, person-to-person Operating Instruction, require the recipient to repeat, restate, rephrase, or recapitulate the Operating Instruction.
 - 1.8.** When issuing an oral Operating Instruction through a one-way burst messaging system used to communicate a common message to multiple parties in a short time

period (e.g. ~~(for example)~~ an all call system), verbally or electronically confirm receipt from one or more receiving parties.

1.9. When receiving an oral Operating Instruction through a one-way burst messaging system used to communicate a common message to multiple parties in a short time period (e.g. ~~(for example)~~ an all call system), request clarification from the initiator if the communication is not understood.

R2. Each Distribution Provider and Generator Operator shall implement, in a manner that identifies, assesses and corrects deficiencies, ~~have~~-documented communication protocols for Operating Instructions; ~~between Functional eEntities,~~ that ~~incorporate~~ include the following: [*Violation Risk Factor: ~~Low~~Medium*] [*Time Horizon: Long-term Planning*]

2.1. When receiving an oral two party, person-to-person Operating Instruction, require the recipient to repeat, restate, rephrase, or recapitulate the Operating Instruction.

2.2. When receiving an oral Operating Instruction through a one-way burst messaging system used to communicate a common message to multiple parties in a short time period (e.g. an all call system), request clarification from the initiator if the communication is not understood.

~~R3. Each Balancing Authority, Reliability Coordinator, and Transmission Operator shall implement a process for identifying deficiencies with adherence to the documented communication protocols specified in Requirement R1 that: [*Violation Risk Factor: Medium*] [*Time Horizon: Operations Planning*]~~

~~3.1. Identifies potential deficiencies;~~

~~3.2. Assesses the deficiencies found;~~

~~3.3. Corrects the deficiencies, and~~

~~3.4. Evaluates the process based on deficiencies found external to Part 3.1 and either~~

~~• implements modifications to the process when the evaluation determines that modification of the process is necessary to address the deficiencies found; or~~

~~• demonstrates that no modification to the process is necessary to address the deficiencies.~~

~~R4. Each Distribution Provider and Generator Operator shall implement a process for identifying deficiencies with adherence to the documented communication protocols specified in Requirement R2 that: [*Violation Risk Factor: Medium*] [*Time Horizon: Operations Planning*]~~

~~4.1. Identifies potential deficiencies;~~

~~4.2. Assesses the deficiencies found;~~

~~4.3. Corrects the deficiencies, and~~

~~4.4. Evaluates the process based on deficiencies found external to Part 4.1 and either~~

- ~~implements modifications to the process when the evaluation determines that modification of the process is necessary to address the deficiencies found; or~~
- ~~demonstrates that no modification to the process is necessary to address the deficiencies.~~

C. Measures

~~M1. Evidence must include each applicable entity's documented communications protocols developed for Requirement R1 and must demonstrate that the protocols have been implemented in a manner that identifies, assesses and corrects deficiencies. Each Balancing Authority, Reliability Coordinator, and Transmission Operator, shall provide its documented communications protocols developed for Requirement R1.~~

~~M1.M2. Evidence must include each applicable entity's documented communications protocols developed for Requirement R2 and must demonstrate that the protocols have been implemented in a manner that identifies, assesses and corrects deficiencies.~~

~~M2. demonstrating Each Distribution Provider and Generator Operator, shall provide its documented communications protocols developed for Requirement R2.~~

~~M3. Each Balancing Authority, Reliability Coordinator, and Transmission Operator shall provide the results of its process developed for Requirement R3.~~

~~M4. Each Distribution Provider and Generator Operator shall provide the results of its process developed for Requirement R4.~~

~~M5.~~

D. Compliance

1. Compliance Monitoring Process

1.1. Compliance Enforcement Authority

The Regional Entity shall serve as the Compliance Enforcement Authority (CEA) unless the applicable entity is owned, operated, or controlled by the Regional Entity. In such cases the ERO or a Regional Entity approved by FERC or other applicable governmental authority shall serve as the CEA.

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 Transmission Operator, Balancing Authority, Reliability Coordinator, Generator Operator, and 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 time as part of an investigation:

Each Balancing Authority, Reliability Coordinator, and Transmission Operator shall retain evidence of its manner that identifies, assesses and corrects deficiencies for Requirement ~~R3-R1~~ Measure ~~M3-M1~~ for the most recent 90 days.

Each Distribution Provider and Generator Operator shall retain evidence of its manner that identifies, assesses and corrects deficiencies for~~for~~ Requirement ~~R4-R2~~ Measure ~~M4-M2~~ for the most recent 90 days.

If a Transmission Operator, Balancing Authority, Reliability Coordinator, Generator Operator or Distribution Provider 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 Medium	The responsible <u>Responsible entity-Entity</u> did not include one (1) of the nine (9) parts of Requirement R1, Parts 1.1 to 1.9 in their documented communication protocols	The <u>Responsible Entity</u> responsible entity did not include two (2) of the nine (9) parts of Requirement R1, Parts 1.1 to 1.9 in their documented communication protocols	The <u>Responsible Entity</u> responsible <u>entity</u> did not include three (3) of the nine (9) parts of Requirement R1, Parts 1.1 to 1.9 in their documented communication protocols	The <u>Responsible Entity</u> responsible entity did not include four (4) or more of the nine (9) parts of Requirement R1, Parts 1.1 to 1.9 in their documented communication protocols OR The <u>Responsible Entity</u> responsible entity did not have documented communication protocols as required in Requirement R1 OR <u>The Responsible Entity did not implement, in a manner that identifies, assesses and corrects deficiencies, their documented communication protocols as required in Requirement R1</u>

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R2	Long Term Planning	Low <u>Med</u> <u>ium</u>	N/A	N/A	The <u>Responsible Entity responsible entity</u> did not include one (1) of the two (2) parts of Requirement R2, Parts 2.1 to 2.2 in their documented communication protocols	The <u>Responsible Entity responsible entity</u> did not include Parts 2.1 to 2.3-2 (3) of Requirement R2, in their documented communication protocols OR The responsible entity did not have documented communication protocols as required in Requirement R2 <u>OR</u> <u>The Responsible Entity did not implement, in a manner that identifies, assesses and corrects deficiencies, their documented communication protocols as required in Requirement R2</u>
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R3	Operations Planning	Medium	N/A	N/A	N/A	<p>The Responsible Entity does not have a process for identifying deficiencies with adherence to the documented communication protocols specified in Requirement R1;</p> <p>Or</p> <p>The Responsible Entity did not evaluate their process based on deficiencies found external to Part 3.1 to determine whether modification of the process is necessary;</p> <p>Or</p> <p>The Responsible Entity did not implement modifications to the process when the evaluation determined that modification of the process was necessary to address the deficiencies found;</p> <p>Or</p> <p>The Responsible Entity did not demonstrate that no modification to the process was necessary to address the deficiencies found external to Part 3.1.</p>
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R4	Operations Planning	Medium	N/A	N/A	N/A	<p>The Responsible Entity does not have a process for identifying deficiencies with adherence to the documented communication protocols specified in Requirement R2;</p> <p>Or</p> <p>The Responsible Entity did not evaluate their process based on deficiencies found external to Part 4.1 to determine whether modification of the process is necessary;</p> <p>Or</p> <p>The Responsible Entity did not implement modifications to the process when the evaluation determined that modification of the process was necessary to address the deficiencies found;</p> <p>Or</p> <p>The Responsible Entity did not demonstrate that no modification to the process was necessary to address the deficiencies found external to Part 4.1.</p>
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E. Regional Variances

None.

Version History

Version	Date	Action	Change Tracking