

NERC

NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION

Consideration of Comments Summary

Project 2007-02 Operating Personnel
Communications Protocols

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RELIABILITY | ACCOUNTABILITY



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Introduction

The Project 2007-02 Drafting Team (OPCP SDT) thanks all commenters who submitted comments on the COM-002-4 Operating Personnel Communications Protocols standard. The standard was posted for a 14-day public comment period from October 21, 2013 through November 4, 2013. Stakeholders were asked to provide feedback on the standard and associated documents through a special electronic comment form. There were 77 sets of comments, including comments from approximately 178 different people from approximately 115 companies representing all 10 Industry Segments.

All comments submitted may be reviewed in their original format on the standard's [project page](#).

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 and Director of Standards, Mark Lauby, at 404-446-2560 or at mark.lauby@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

Consideration of Comments

Purpose of Consideration of Comments Summary

The OPCP SDT appreciates the comments from industry regarding the COM-002-4 standard. All comments were reviewed carefully by the OPCP SDT and changes were made to the standard accordingly. While all comments were reviewed, the new Standards Process Manual (SPM) does not require responses to each individual comment when an additional ballot is needed. However, this document provides a summary of responses to comments. The following pages will provide a summary of the comments received and how the comments were addressed by the OPCP SDT.

COM-002-4 Comments

Operating Instruction Definition

Several commenters provided alternative language to provide clarity for the Operating Instruction definition. After reviewing the comments, and considering the NERC Board of Trustees' November 7th 2013 Resolution², the OPCP SDT has revised the definition of Operating Instruction to remove the reference to Reliability Directive. This was primarily in response to a NOPR issued by FERC³ which proposed to remand the filing that contained the definition of Reliability Directive. This action would result in Reliability Directive not being a defined term. Furthermore, the OPCP SDT inserted parentheses to offset the type of communication that is not included in the Operating Instruction definition to provide additional clarity.

Applicability

Several commenters expressed concern with the standard's applicability to Generator Operators (GOP) and Distribution Providers (DP). The concerned entities commented that some DPs and GOPs do not have 24/7 staff or do not use, own, or operate Bulk Electric System (BES) facilities. Further, some entities expressed concern that the current wording of the standard might require them to begin 24-hour operations, and require them to install recording equipment, even if they never receive an Operating Instruction.

In response to the comments and the NERC Board Resolution, the OPCP SDT revised the standard to clarify that DPs and GOPs are required to a) train their operators prior to receiving an Operating Instruction, and b) use three-part communication when receiving an Operating Instruction during an Emergency. In addition, the measures have been revised to show that a DP or GOP can demonstrate compliance for use of three-part communication when receiving an Operating Instruction during an Emergency by providing an attestation from the issuer of the Operating Instruction. If a DP or GOP never receives an Operating Instruction, no requirement in this standard would apply to them. To clarify, it was never the intent of the OPCP SDT to require entities to change their staffing, or to install any additional equipment to demonstrate compliance.

Non-Emergency Operations

Some entities stated that the communications protocols specified in COM-002-4 should not apply to non-Emergency or day-to-day operations. Similarly, some entities expressed concern that three-part communications are not necessary for non-Emergency and day-to-day operations.

² See [http://www.nerc.com/gov/bot/Board of Trustees Quarterly Meetings/Board COM Resolution 11.7.13 v1 AS APPROVED BY BOARD.pdf](http://www.nerc.com/gov/bot/Board%20of%20Trustees%20Quarterly%20Meetings/Board%20COM%20Resolution%2011.7.13%20v1%20AS%20APPROVED%20BY%20BOARD.pdf)

³ See [http://www.nerc.com/FilingsOrders/us/FERCOrdersRules/NOPR TOP IRO RM13-12 RM13-14 RM13-15 20131121.pdf](http://www.nerc.com/FilingsOrders/us/FERCOrdersRules/NOPR%20TOP%20IRO%20RM13-12%20RM13-14%20RM13-15%2020131121.pdf)

The OPCP SDT respectfully disagrees with these comments. From a practical standpoint, one set of communications protocols for both emergency and non-emergency situations will reduce confusion for operating personnel. In particular, operating personnel would not have to switch to a different set of (potentially unfamiliar) communications protocols in stressful emergency situations. This is especially true for three-part communications. Operating personnel should be using three-part communications in day-to-day operations so that the use of three-part communications during emergency conditions is natural and supports effective communications. Also, FERC Order No. 693 directed the OPCP SDT to address both emergency and non-emergency communications protocols. The NERC Board of Trustees also directed the Standards Committee and the OPCP SDT to draft a single Reliability Standard that includes communications protocols for emergency and non-emergency operations. A new draft of COM-002-4 was developed in response to this input.

Requirement R1 Clarification

Several commenters requested more clarity in Requirement R1. Some entities expressed confusion over whether a receiver of an Operating Instruction was required to respond when operating personnel that issued an Operating Instruction were required to confirm a response. Other entities wanted more clarity as to what actions may be taken by operating personnel issuing an Operating Instruction when no response was received. Additionally, several entities stated that some of the protocols were unnecessary, specifically the use of English and the use of alpha-numeric clarifiers.

The OPCP SDT revised Requirement R1 to provide more clarity as well as provide more latitude to operating personnel issuing an Operating Instruction. The revised requirement states that operating personnel that issue an Operating Instruction may take an alternate action to issue an Operating Instruction when the receiver does not respond or if the receiver does not understand the Operating Instruction. This revision more accurately reflects the scope of actions that an issuer of an Operating Instruction can take. In response to the comments above, the OPCP SDT removed Part 1.8 which required entities to specify which instances required alpha-numeric clarifiers in their communications protocols. The requirement for the use of the English language was retained, since it was incorporated from COM-001-1.1 Requirement R4.

GOP and DP Documented Communications Protocols and Three-Part Communications

Some entities commented that GOPs and DPs should not be required to develop documented communications protocols because they only receive Operating Instructions and/or Reliability Directives.

The OPCP SDT agrees that the requirement to develop documented communications protocols for DPs and GOPs is not necessary. The OPCP SDT removed the seventh posting's Requirement R2, which required documented communications protocols for GOPs and DPs that receive Operating Instructions. In the eighth posting, the only requirements that apply to DPs and GOPs are Requirements R3 and R6. Requirement R3 requires initial training for operating personnel who can receive an Operating Instruction. Requirement R6 requires receivers of Operating Instructions issued during an Emergency to use three-part communications. Requirement R5 supports Requirement R6 by requiring each BA, RC, and TOP that issues an Operating Instruction during an Emergency to use three-part communications. Therefore, the OPCP SDT reduced the administrative burden on GOP and DP while covering any reliability gap by requiring GOPs and DPs receiving Operating Instructions during an Emergency to engage in three-part communications.

"Implement" and Training

Several entities requested clarification for the word "implement" in Requirements R3 and R4 from the seventh posting. They expressed concern that the term was difficult to demonstrate compliance with.

In response, the OPCP SDT removed those requirements and added Requirements R2 and R3 in the eighth posting. Requirement R2 now requires each BA, RC, and TOP to conduct initial training for each operator responsible for the Real-time operation of the interconnected BES on the documented communications protocols developed in Requirement R1. Requirement R3 requires each DP and GOP to conduct initial training for each operator who can receive an Operating Instruction. The OPCP SDT originally intended “implement” to include this initial training but determined an initial training requirement more clearly captures this intent. In addition, Requirement R4 was added to require BAs, RCs, and TOPs to at least once every 12 months assess adherence by its operating personnel to the documented communication protocols in Requirement R1 and to provide feedback to its operators on their performance, including any appropriate corrective actions. It also requires these entities to assess the effectiveness of their communications protocols and make changes as necessary to improve the effectiveness of the protocols. The requirement of entities to self assess, self identify and provide feedback to its operators was also included in the Board of Trustees’ resolution. Further, the OPCP SDT believes that it is good operating practice for an entity to periodically evaluate the effectiveness of their protocols and improve them when possible. Additionally, the OPCP SDT also believes it is good operating practice to provide operators with performance feedback on their adherence to the entity’s documented protocols. This provides entities an opportunity to evaluate their operators’ performance and take corrective actions where necessary, which could prevent a miscommunication from occurring and thus quite possibly prevent an event which could harmful to the reliability of the Bulk Electric System.

The OPCP SDT believes the combination of R1-R4 and a non-zero tolerance approach to compliance, for Operating Instructions issued/received during a non-Emergency, represents an improvement over the previous “implement” terminology as it better captures an approach that improves reliability by providing a shorter assessment and correction cycle for an entity than a traditional audit schedule and reduces the associated compliance burden concurrently.

Consistent Pattern

Several commenters expressed concern with the phrase “consistent pattern” in the VSLs for Requirements R3 and R4.

The OPCP SDT agrees that the term is vague and has removed it from the revised VRFs and VSLs.

VRFs and VSLs

Several commenters requested revised VRFs and VSLs.

The OPCP SDT modified the VRFs and VSLs to better reflect the differences in severity of violating a documents requirement (*i.e.* Requirement R1), violating a training or assessment requirement (*i.e.* Requirements R2, R3 and R4) and violating a requirement when issuing or receiving an Operating Instruction during an Emergency (*i.e.* Requirements R5, R6 and R7). In addition, the OPCP SDT focused on using clear language in the VSLs.

Zero Defect Standard

Some entities expressed concern that posting seven of the standard had elements that had no tolerance for compliance deviations. Given that the Board directed the OPCP SDT to include no exceptions for using three-part communications for emergency communications, the OPCP SDT determined that the standard must maintain this aspect in a few requirements. However, the OPCP SDT took this approach only for

Operating Instructions issued during an Emergency in Requirements R5, R6, and R7. Therefore, the OPCP SDT limited the zero tolerance approach to only Emergency communications in the standard.

Compliance/Enforcement

Several commenters expressed concern over compliance with the requirements and their enforceability.

In response, the OPCP SDT focused on eliminating vague terms from the standard that would create ambiguity in compliance with the standard. In addition, the comments have been provided to NERC Compliance to use in revising the RSAW that is posted with the eighth posting of the standard.