

Meeting Notes

Operating Personnel Communications Protocols SDT — Project 2007-02

January 21–23, 2009

1. Introductions

Lloyd Snyder welcomed everyone to the meeting and reviewed the agenda. Harry asked for updates to the team roster that was sent earlier. The goal of this meeting is to finalize the following documents associated with COM-003-1 with a goal of posting the standard for a comment period as soon as practical following the meeting.

COM-003-1:

- Proposed standard
- Background and questions for comment form
- Proposed implementation plan

A team member raised an issue that is happening in NPCC regarding CIP standards and its effect upon blackstart generators in the region. In particular, the blackstart participation in the ISO-NE footprint has been inhibited by concerns over CIP standard compliance. Some generators have declined participation in the blackstart program citing prohibitive costs to comply with the CIP standards for “critical assets”. Harry agreed to bring this issue to the attention of the chair and vice chair of the Cyber Security Order 706 Standard Drafting Team.

2. NERC Antitrust Compliance Guidelines.

Harry Tom reviewed the guidelines.

3. FERC Staff Feedback Discussion

Leanne Harrison reviewed information provided to FERC staff and discussed FERC staff feedback.

4. Reviewed the Criteria for Time Horizons, Violation Risk Factors, and Violation Severity Levels

The SDT reviewed the criteria for Time Horizons, Violation Risk Factors, and Violation Severity Levels and then discussed whether to add some or all of these elements to COM-003-1 before it is posted for stakeholder comment. Under the approved standards development process, a drafting team may elect to delay posting the compliance elements of the standard until there is consensus on the requirements. Mark Bradley asked whether it made sense to post the initial standard draft without VSLs. He suggested that it may

slow down the process. He believes that stakeholders would take a closer look at the standard when it is submitted in whole rather than piecewise. Harry explained that the first posting without VSLs places the focus on the technical elements (requirements, measures, VRFs, and Time Horizons) of the standard and that Compliance elements are to follow in the second posting. A straw vote was taken and the SDT was evenly split 5 for and 5 opposed to including the VSLs. The SDT agreed to have Harry break the tie and he voted to post without the VSLs.

5. Final Review

In the final review of the draft standard, the SDT made some modifications. They are as follows:

- a) Clarified the definition for Three-part Communications by adding “correctly” to ensure that repeating the information is successful, and deleting “verbatim” to avoid unintended enforcement issues.
- b) Clarified Requirement R6 by removing the phrase “or for clarification” to minimize potential confusion which may arise from the choice created by the “or”.
- c) The SDT eliminated Requirement R8. after thorough discussion. This requirement specified a minimum review cycle of 12 calendar months for the CPOP and a 30-day update period for changes to system. The SDT did not intend for the CPOP to contain a list of line and equipment identifiers and therefore does not need updating for system changes. The other elements of a CPOP such as contained in R2 through R7 are not expected to need annual updating. The SDT believes that R7 already requires that predetermined mutually understood line and equipment identifiers are to be kept up to date.
- d) The SDT reviewed the background information and list of questions in the COM-003-1 Comment Form. There are a total of seven questions the SDT developed for the COM-003-1 standard. The background section was expanded to cover discussion of the SAR, purpose statement, and applicability, requirements R1 through R7, elimination of R8, choice of common time zone, assignment of VRFs, Time Horizons, and the RCWG Alert Level Guide document.

6. The SDT Reviewed the Implementation Plan

7. The SDT Updated its Project Schedule

- a) Initial Comment period — February 16–April 1, 2009
- b) Consideration of comments by SDT — April 14–16, 2009
- c) Second Comment period — May 16–June 15, 2009

- d) Respond to second period comments and post for pre-ballot review — July 15, 2009
- e) Ballot period — July 22–31, 2009
- f) Respond to negative ballot(s) and submit to NERC BOT for approval — August 4, 2009 or November 4, 2009.

8. Next Actions

- a) Harry will e-mail the final clean and redline documents (Standard, Comment Form, and Implementation Plan) to the SDT on January 26, 2009. Final review by the SDT is to be completed by February 2, 2009 with the goal of posting on February 16, 2009.
- b) During the initial Comment Period a WebEx is planned to present the draft COM-003-1 standard to industry stakeholders on about March 4, 2009 from 2–4 p.m. Eastern. In preparation for the WebEx, a draft slideshow is required by February 17, 2009 (time is still TBD). A finalized set of PowerPoint slides are due by February 24, 2009.
- c) The first Comment Period is expected to close by April 1, 2009. The next full team meeting is scheduled for April 14–16, 2009 in Atlanta, GA.
- d) In the July 7–9, 2009 timeframe the SDT plans a meeting to respond to second period comments. The location will be San Francisco (Bill Ellard)?
- e) In preparation for eventual approval by NERC BOT and filing with the FERC, a draft filing document must be developed by the SDT. A meeting is anticipated for the August 2009 timeframe at Niagara on the Lake.
- f) The SDT may be asked to prepare a Reliability Standard Audit Worksheet to support the Compliance Program. A meeting may be necessary to develop a COM-003-1 RSAW.