

Consideration of Comments on Project 2007-02 Operating Personnel Communications Protocols — Standard COM-003-1

The Operating Personnel Communications Protocols Standard Drafting Team (OPCP SDT) thanks all commenters who submitted comments on the proposed draft COM-003-1 Operating Personnel Communications Protocols Reliability Standard. This standard was posted for a 45-day public comment period from November 30, 2009 through January 15, 2010. Stakeholders were asked to provide feedback on the standard through a special electronic comment form. There were 71 sets of comments submitted, including comments from more than 280 different people from over 100 companies representing 9 of the 10 Industry Segments as shown in the table on the following pages.

http://www.nerc.com/filez/standards/Op_Comm_Protocol_Project_2007-02.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 2563 or at Herb.Schrayshuen@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

Summary Consideration:

The majority of commenters expressed disagreement with the standard.

Definitions:

Most commenters found the proposed definitions confusing. The SDT has removed all three definitions (Communications Protocol, Three-part Communication and Interoperability Communication).

- The term “Three-Part Communications” was subsumed into Requirements R2 and R3 in the revised standard.
- The OPCP SDT changed “Interoperability Communications” to become “Operating Communications,” which is now defined as: “Communication of instruction to change or maintain the state, status, output, or input of an Element or Facility of the Bulk Electric System.”

The OPCP SDT also addressed complaints stating it was unclear if “Interoperability Communication” included internal communication (communication between functional entities of the same organization), external communication (communication between two or more Functional Entities not within the same organization), or both.

“Operating Communication”, the proposed definition to replace “Interoperability Communication,” addresses changes in state, status, output, or input of any Element or Facility, capturing all communication that affects BES reliability. The term “Operating Communication” includes any communication that is requesting a change to the BES, regardless of whether the communicators are internal or external.

¹ The appeals process is in the Standard Processes Manual:
http://www.nerc.com/files/Appendix_3A_Standard_Processes_Manual_Rev%201_20110825.pdf.

Requirements:

Requirement R1 (required entities to have a Communications Protocol Operating Procedure):

- The majority of the comments stated a Communications Protocol Operating Procedure (CPOP) would be administrative in nature and would not satisfy the criterion of enhancing the reliable operation of the BES. The SDT has removed it from the revised standard.

Requirement R2 (required entities to use pre-defined system condition terminology for verbal and written Interoperability Communications as defined in an Attachment)

- Many commenters indicated Requirement R2 should not have been applicable to TSPs and LSEs. The SDT removed TSPs and LSEs from the standard to be consistent with the approved SAR.
- Many commenters indicated that the scope (involving all Interoperability Communications) of the requirement was too broad.
- Several commenters indicated that the focus of this requirement was confusing and mixed guidance with requirements.
- Several commenters proposed expanding the table of alerts to include the alerts from EOP-002 – Capacity and Energy Emergencies.
- Several commenters indicated that this requirement is calling for entities to make notifications, and take actions under specific conditions, and belongs in other standards.
- The SDT determined that the notifications in the proposed requirement are not “communications protocols” and do not belong in COM-003 and removed the requirement from the revised standard.

Requirement R3 (required entities to use English language for all Interoperability Communications)

- Some commenters indicated that there are some places where there are legal requirements to use a language other than English. The SDT modified the standard (now Requirement R1, Part 1.1.1) to clarify that this requirement is not applicable where another language is mandated by law or regulation:
 - 1.1.1 Use the English language when communicating between functional entities, unless another language is mandated by law or regulation.

Requirement R4 (required entities to use Central Standard Time (24 hour format) for all Interoperability Communications)

- The majority of commenters stated Requirement R4 would add confusion for the operators and decrease reliability. Some recommend the use of another time in place of Central Standard Time. The SDT modified the standard to require use of the 24 hour format (new 1.1.2) in all Operating Communications and the inclusion of a time zone reference (new 1.1.3) only when Operating Communications occur between different time zones.

1.1.2. Use the 24-hour clock format when referring to clock times.

1.1.3. When the communication is between entities in different time zones, include the time, time zone and indicate whether time is daylight saving time or standard time.

Requirement R5 (required entities to use Three-part Communications when issuing a directive during verbal Interoperability Communications)

- Many commenters offered differing recommendations on R5 regarding the application and Definition of “Reliability Directive.” The proposed term “Reliability Directive” is being developed by the RC SDT for Project 2006-06. The SDT avoided use of the terms, “directive” and “Reliability Directive” in the second draft of COM-003.
- Many commenters recommended splitting proposed Requirement R5 to recognize the two distinct parties (sending and receiving) in the three part communication process. The OPCP SDT has done so by separating what had been Requirement R5 into R2 (for the sender) and Requirement R3 (for the receiver). Together these two requirements fully assign the responsibility to accomplish three-part communication.
- Some commenters expressed concerns regarding potential audit citations if a repeat-back was not word-for-word or verbatim. The OPCP SDT added the phrase “not necessarily verbatim” to address the concern. In other words as long as the communication is clear and accurately conveys the Operating Communication and its substantive components, it is acceptable.

R2. Each Reliability Coordinator, Transmission Operator and Balancing Authority that issues an oral, two party, person-to-person Operating Communication; excluding Reliability Directives shall: *[Violation Risk Factor: Medium][Time Horizon: Real-Time]*

2.1. Issue the Operating Communication and wait for a response from the receiver.

2.2. After a response is received , or if no response is received, do one of the following:

- Confirm the receiver’s response, if the repeated information is correct (not necessarily verbatim).
- Reissue the Operating Communication if the repeated information is incorrect, or the issuer does not receive a response.
- Reissue the Operating Communication if requested by the receiver.

R3. Each Reliability Coordinator, Transmission Operator, Balancing Authority, Generator Operator and Distribution Provider that receives an oral two party, person-to-person Operating Communication excluding Reliability Directives , shall take one of the following actions:

- Repeat the Operating Communication, (not necessarily verbatim) and wait for confirmation from the issuer that the repetition was correct.
- Request that the issuer reissue the Operating Communication.

Requirement R6 (required entities to use the NATO alphabet during verbal Interoperability Communications)

- Many commenters indicated the use of a phonetic alphabet is not necessary and should not be required, as it will not improve reliability of the BES and that there are no instances where the absence of its use has resulting in reliability problems. The SDT disagrees with this comment and believes that enhanced clarity around verbally conveyed alpha-numeric information is critical for ensuring clear and effective real-time communication between BES operating entities.
- Commenters stated that requiring strict adherence to and precise pronunciation of the NATO phonetic alphabet is overly prescriptive, and the proposed standard should allow for other phonetic clarifiers where clarity on alpha-numeric information is necessary. The SDT agrees, and modified the Requirement to allow for use of the any correct alpha numeric clarifier. The revised language was moved into Requirement R1, as Part 1.2.

1.2 When participating in oral Operating Communications and using alpha-numeric identifiers, use accurate alpha-numeric clarifiers.²

Requirement R7 (required entities to use pre-determined, mutually agreed upon line and equipment identifiers for all Interoperability Communications)

- Many commenters indicated Requirement R7 should not have been applicable to TSPs and LSEs. The SDT agrees, and has removed TSPs and LSEs from the standard to be consistent with the approved SAR.
- Additional commenters indicated the word “equipment” as used in Requirement R7 was too broad. The SDT modified the standard to use the defined terms “Element” and “Facility” instead of “equipment”.
- Other commenters indicated Requirement R7 addressed a planning function already included in TOP-002, and should not be included in COM-003. The drafting team believes communications between entities would be improved when use of pre-determined identifiers is required for interface Elements and Facilities. The SDT retained the concept of R7 and transferred it into Requirement R1, Part 1.1.4.
- There were additional comments that uniform and mutually agreed line and equipment identifiers should not be mandated so long as the identifiers are pre-determined. The SDT agrees documentation of mutual agreement is not necessary, so long as the identifiers are pre-determined, understood and used during Operating Communications. The standard has been modified to reflect this change.

²The North Atlantic Treaty Organization (NATO) Phonetic Alphabet or International Radiotelephony Spelling Alphabet is one example of a widely utilized set of alpha- numeric clarifiers.

- Commenters indicated a general consensus for the mandatory use of line and equipment identifiers applying only to interface Elements, not Elements or Facilities internal to the footprint of the entity. The SDT modified the standard to apply only to interface Elements and Facilities.
 - 1.1.4 When referring to a Transmission interface Element or a Transmission interface Facility, use the name specified by the owner(s) for that Transmission Element or Transmission Facility.

Outstanding Minority Issues

Several stakeholders identified potential conflicts between COM-003 and work underway in Project 2006-06 – Reliability Coordination where another drafting team is also addressing the use of three-part communications. In Project 2006-06 the proposed requirements focus on the use of three part communication when issuing and receiving “Reliability Directives.” As proposed, a Reliability Directive is a directive issued to address an Emergency or an Adverse Reliability Impact. The OPCP SDT proposes use of three-part communication for all Operating Communications, which would include Reliability Directives. To prevent double jeopardy, the second draft of the Implementation Plan for COM-003 proposes retiring COM-002 when COM-003 becomes effective.

Some additional comments were received indicating the previously posted standard was too prescriptive in specifying “how” to communicate, instead of “what.” The SDT proposes that the second draft of the standard is more focused on “what” protocols to use in specific situations.

Commenters also indicated the proposed standard was unnecessary and would distract operators from reliably controlling the system. The SDT disagreed based on Blackout Task Force Report recommendation 26, which calls for tightening communication to improve reliability.

Addendum: As a result of the April 2012 Quality Review, the SDT adopted many changes that would impact many of the responses in this document. The SDT believes the QR recommendations provide clarity for the requirements and add discernible reliability value.

- A significant QR change is the addition of language excluding “Reliability Directives” from the scope of Operating Communications addressed in R2 and R3. The purpose of the exclusion is to prevent a potential overlap by requiring the use of three part communications in two different standards (COM 003-1 and COM 002-3). Thus, several of the responses in this report indicate that the term, “Reliability Directive” is not used in COM-003-2 and that is no longer true. Based on the need to distinguish between Reliability Directives (Operating Communications issued relative to an Emergency) and Operating Communications (Operating Communications issued anytime there is a need to communicate about maintenance or a change to an Element or Facility on the BES), Requirements R2 and R3 now include phrases to indicate they **do not apply** to “Reliability Directives”. Retention of the requirements for three-part communication in COM-002-3, recognizes that failure to effectively communicate during an Emergency has greater potential risk to reliability than a similar failure during other operating conditions. Thus noncompliance with three-part communication in COM-002-3 has a High VRF while as proposed, noncompliance with three part communications for

Operating Communications during other than Emergencies as proposed in COM-003-1 has a Medium VRF.

- The SDT believes the proposed definition: *Reliability Directive* is a subset of Operating Communication when the Reliability Directive is an instruction to change or maintain the state, status, output, or input of an Element or Facility of the Bulk Electric System. While Reliability Directives are excluded from COM 003-01, Requirements R2 and R3, Reliability Directives are subject to the protocols in Requirement R1.
- The SDT modified the implementation plan to omit the reference to retirement of COM-002-3.

Index to Questions, Comments, and Responses

1. Do you agree with the adoption of the following new terms for inclusion in the NERC Glossary and their proposed definitions: Communications Protocol, Three-part Communication, and Interoperability Communication? If not, please explain in the comment area..... 22
2. The SDT incorporated TOP-002-2 Requirement R18 into this new standard COM-003-1 as Requirement R7. In TOP-002-2, Requirement R18 applies to the Transmission Service Provider and Load Serving Entity. These entities are now added to COM-003-1. Do you agree with this proposal? If not, please explain in the comment area..... 74
3. Requirement R1 of the draft COM-003-1 states, “Each Reliability Coordinator, Balancing Authority, Transmission Owner, Transmission Operator, Generator Operator, Transmission Service Provider, Load Serving Entity and Distribution Provider shall develop a written Communications Protocol Operating Procedure (CPOP) for Interoperability Communications among personnel responsible for Real-time generation control and Real-time operation of the interconnected Bulk Electric System. The CPOP shall include but is not limited to all elements described in Requirements R2 through R7 to ensure effective Interoperability Communications.” Do you agree with this proposal? If not, please explain in the comment area..... 97
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6. Requirement R5 of the draft COM-003-1 states, “Each Responsible Entity shall use Three-part Communications when issuing a directive during verbal Interoperability Communications.” Do you agree with this proposal? If not, please explain in the comment area. 169
7. Requirement R6 of the draft COM-003-1 states, “Each Responsible Entity shall use the North American Treaty Organization (NATO) phonetic alphabet as identified in Attachment 2-COM-003-1 when issuing directives, notifications, directions, instructions, orders or other reliability related operating information that involves alpha-numeric information during verbal Interoperability Communications.” Do you agree with this proposal? If not, please explain in the comment area..... 199
8. Requirement R7 of the draft COM-003-1 states, “Each Responsible Entity shall use pre-determined, mutually agreed upon line and equipment identifiers during for all verbal and written Interoperability Communications.” Do you agree with this proposal? If not, please explain in the comment area..... 226

9. Attachment 1-COM-003-1 is based upon work performed by the Reliability Coordinator Working Group (RCWG). Do you have any concerns or suggestions for improvement of the attachment? If yes, please provide in the comment area. (If you are involved in the field testing of the Alert Level Guide please share any comments regarding the use of the guideline as it relates to the field test.)..... 246
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12. Do you have any other comments to improve the draft standard? If yes, please elaborate in the comment area..... 292

Consideration of Comments on OPCP SDT — Project 2007-02

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

		Commenter	Organization	Industry Segment											
				1	2	3	4	5	6	7	8	9	10		
1.	Group	Mike Garton	Electric Market Policy	X		X		X	X						
Additional Member Additional Organization Region Segment Selection															
	1.	Bill Thompson	Dominion Resources, Inc.	SERC	1										
	2.	Jalal Babik	Dominion Resources, Inc.	SERC	1										
	3.	Louis Slade	Dominion Resources, Inc.	RFC	6										
	4.	Jack Kerr	Dominion Resources, Inc.	SERC	1										
2.	Group	Jason L. Marshall	Midwest ISO Standards Collaborators		X										
Additional Member Additional Organization Region Segment Selection															
	1.	Jim Cyrulewski	JDRJC Associates, LLC	RFC	8										
	2.	Kirit Shah	Ameren	SERC	1										
	3.	Bill Hutchison	Southern Illinois Power Cooperative	SERC	1										
	4.	Greg Mason	Dynegy	NPCC	5										
	5.	Joe Knight	Great River Energy	MRO	1, 3, 5, 6										
	6.	Kenneth A. Goldsmith P.E.	Alliant Energy	MRO	4										
	7.	Barb Kedrowski	We Energies	RFC	3, 4, 5										
	8.	Rick Koch	NPPD	MRO	1, 3, 5										
	9.	Alisha Anker	Prairie Power, Inc.	SERC	3										

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10.	Larry Larson	Otter Tail Power	MRO	1																																																																																																																																			
11.	Randi Woodward	Minnesota Power	MRO	1, 3, 5, 6																																																																																																																																			
12.	Ben Porath	Dairyland Power Cooperative	MRO	1, 3, 5																																																																																																																																			
3.	Group	Guy Zito	Northeast Power Coordinating Council																			X																																																																																																																	
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1.	Ray Phillips	AMEA	SERC	3, 4																
2.	Alan Jones	Alcoa	SERC	1, 5																
3.	Fred Krebs	Calpine	SERC	5																
4.	Jack Kerr	Dominion VP	SERC	1, 3																
5.	Louis Slade	Dominion VP	SERC	1, 3																
6.	Greg Rowland	Duke Energy	SERC	1, 3, 5																
7.	Laura Lee	Duke Energy	SERC	1, 3, 5																
8.	Sam Holeman	Duke Energy	SERC	1, 3, 5																
9.	Scott Watts	Duke Energy	SERC	1, 3, 5																
10.	Greg Mason	Dynegy	SERC	5, 6																
11.	Chad Randall	E.ON.US	SERC	1, 3, 5																
12.	Keith Steinmetz	E.ON.US	SERC	1, 3, 5																
13.	Jim Case	Entergy Transmission	SERC	1, 3																
14.	Melinda Montgomery	Entergy Transmission	SERC	1, 3																
15.	Wayne Mitchell	Entergy Transmission	SERC	1, 3																
16.	Bob Thomas	IMEA	SERC	3, 4, 9																
17.	Nick Lamotte	LA Generating	SERC	1, 3, 5																
18.	Timmy LeJeune	LA Generating	SERC	1, 3, 5																
19.	Jason Marshall	Midwest ISO	SERC	2																
20.	Randy Castello	Mississippi Power	SERC	1, 3, 5																
21.	Scott McGough	OPC (Oglethorpe Power)	SERC	5																
22.	Mike Bryson	PJM	SERC	2																
23.	Bill Thigpen	PowerSouth	SERC	1, 3, 5, 9																
24.	Tim Hattaway	PowerSouth	SERC	1, 3, 5, 9																
25.	Glenn Stephens	Santee Cooper	SERC	1, 3, 5, 9																
26.	Kristi Boland	Santee Cooper	SERC	1,3,5,9																
27.	Rene' Free	Santee Cooper	SERC	1,3,5,9																
28.	Tom Abrams	Santee Cooper	SERC	1,3,5,9																
29.	Gene Delk	SCE&G	SERC	1,3,5																
30.	John Troha	SERC Reliability Corp.	SERC	10																
31.	Alvis Lanton	SIPC	SERC	1,3,5																

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32.	John Rembold	SIPC	SERC	1,3,5																																																																																																																																																																																																																																																																																																																																																																
33.	Gwen Frazier	Southern Co.	SERC	1,3,5																																																																																																																																																																																																																																																																																																																																																																
34.	Jim Griffith	Southern Co.	SERC	1,3,5																																																																																																																																																																																																																																																																																																																																																																
35.	Mike Hardy	Southern Co.	SERC	1,3,5																																																																																																																																																																																																																																																																																																																																																																
36.	Rocky Williamson	Southern Co.	SERC	1,3,5																																																																																																																																																																																																																																																																																																																																																																
37.	Annette L. Moore	TVA	SERC	1,3,5,9																																																																																																																																																																																																																																																																																																																																																																
38.	Bob Pizarro	TVA	SERC	1,3,5,9																																																																																																																																																																																																																																																																																																																																																																
39.	Ed Rudder	TVA	SERC	1,3,5,9																																																																																																																																																																																																																																																																																																																																																																
40.	Edd Forsythe	TVA	SERC	1,3,5,9																																																																																																																																																																																																																																																																																																																																																																
41.	Joel Wise	TVA	SERC	1,3,5,9																																																																																																																																																																																																																																																																																																																																																																
42.	John Kell	TVA	SERC	1,3,5,9																																																																																																																																																																																																																																																																																																																																																																
43.	Larry Akens	TVA	SERC	1,3,5,9																																																																																																																																																																																																																																																																																																																																																																
44.	Sam Austin	TVA	SERC	1,3,5,9																																																																																																																																																																																																																																																																																																																																																																
5.	Group	Margaret Ryan	Pacific Northwest Small Utilities Comment Group					X	X																																																																																																																																																																																																																																																																																																																																																											
<table border="1"> <thead> <tr> <th colspan="2">Additional Member</th> <th colspan="2">Additional Organization</th> <th>Region</th> <th>Segment</th> <th colspan="15">Selection</th> </tr> </thead> <tbody> <tr><td>1.</td><td>Central Lincoln PUD</td><td></td><td></td><td>WECC</td><td>3</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td>2.</td><td>Cowlitz PUD</td><td></td><td></td><td>WECC</td><td>3</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td>3.</td><td>Blachly-Lane Electric Cooperative</td><td></td><td></td><td>WECC</td><td>3</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td>4.</td><td>Central Electric Cooperative, Inc.</td><td></td><td></td><td>WECC</td><td>3</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td>5.</td><td>Coos-Curry Electric Cooperative</td><td></td><td></td><td>WECC</td><td>3</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td>6.</td><td>Douglas Electric Cooperative</td><td></td><td></td><td>WECC</td><td>3</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td>7.</td><td>Fall River Electric Cooperative, Inc.</td><td></td><td></td><td>WECC</td><td>3</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td>8.</td><td>Lane Electric Cooperative, Inc.</td><td></td><td></td><td>WECC</td><td>3</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td>9.</td><td>Lincoln Electric Cooperative, Inc.</td><td></td><td></td><td>WECC</td><td>3</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td>10.</td><td>Lost River Electric Cooperative</td><td></td><td></td><td>WECC</td><td>3</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td>11.</td><td>Northern Lights, Inc.</td><td></td><td></td><td>WECC</td><td>3</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td>12.</td><td>Okanogan Country Electric Cooperative, Inc.</td><td></td><td></td><td>WECC</td><td>3</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td>13.</td><td>Raft River Electric Cooperative, Inc.</td><td></td><td></td><td>WECC</td><td>3</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td>14.</td><td>Salmon River Electric Cooperative, Inc.</td><td></td><td></td><td>WECC</td><td>3</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td>15.</td><td>Umatilla Electric Cooperative</td><td></td><td></td><td>WECC</td><td>3</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr> </tbody> </table>																					Additional Member		Additional Organization		Region	Segment	Selection															1.	Central Lincoln PUD			WECC	3																2.	Cowlitz PUD			WECC	3																3.	Blachly-Lane Electric Cooperative			WECC	3																4.	Central Electric Cooperative, Inc.			WECC	3																5.	Coos-Curry Electric Cooperative			WECC	3																6.	Douglas Electric Cooperative			WECC	3																7.	Fall River Electric Cooperative, Inc.			WECC	3																8.	Lane Electric Cooperative, Inc.			WECC	3																9.	Lincoln Electric Cooperative, Inc.			WECC	3																10.	Lost River Electric Cooperative			WECC	3																11.	Northern Lights, Inc.			WECC	3																12.	Okanogan Country Electric Cooperative, Inc.			WECC	3																13.	Raft River Electric Cooperative, Inc.			WECC	3																14.	Salmon River Electric Cooperative, Inc.			WECC	3																15.	Umatilla Electric Cooperative			WECC	3															
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	Commenter	Organization	Industry Segment											
			1	2	3	4	5	6	7	8	9	10		
16.	West Oregon Electric Cooperative, Inc.	WECC 3												
17.	Consumers Power Inc.	WECC 3												
18.	Clearwater Power Company	WECC 3												
19.	Pacific Northwest Generating Cooperative	WECC 4												
6.	Group	Martin Kaufman	ExxonMobil Research and Engineering	X					X					
Additional Member			Additional Organization	Region		Segment Selection								
1.	David Cheshire	ExxonMobil Corp - Baton Rouge	SERC	NA										
2.	Joe Gourley	ExxonMobil Oil Corporation Beaumont Refinery	SERC	NA										
3.	Brock Pearson	ExxonMobil Refining and Supply Company	ERCOT	NA										
7.	Group	Patti Metro	NRECA RTF Members	X		X	X	X						
Additional Member			Additional Organization	Region		Segment Selection								
1.	Mark Ringhausen	Old Dominion Electric Cooperative	SERC	4										
2.	Steve McElhane	South Mississippi Electric Power Association	SERC	5										
3.	John Alberts	Wolverine Power Cooperative	RFC	1										
4.	Noman Williams	Sunflower Electric Power Corporation	SPP	1										
5.	Bob Solomon	Hoosier Energy	RFC	1										
6.	Chris Bolick	Associated Electric Cooperative	SERC	1, 3										
7.	John Bussman	Associated Electric Cooperative	SERC	1, 3										
8.	Mike Avant	Garkane Energy	WECC	NA										
8.	Group	Mike Bryson	PJM		X									
Additional Member			Additional Organization	Region		Segment Selection								
1.	Patrick Brown	PJM	RFC	2										
2.	Albert DiCaprio	PJM	RFC	2										
3.	William Harm	PJM	RFC	2										
4.	Tom Bowe	PJM	RFC	2										
9.	Group	Mike Bryson	PJM SOS Comments		X									
Additional Member			Additional Organization	Region		Segment Selection								
1.	Jeff Boltz	First Energy	RFC	1										

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	Commenter	Organization			Industry Segment											
					1	2	3	4	5	6	7	8	9	10		
2.	Stephen Alexander	PEPCO	RFC	1, 3												
3.	Bill Keagle	Baltimore Gas & Electric	RFC	1, 3												
4.	Carl J. Eng	Dominion Virginia Power	SERC	1, 3												
5.	Ron Warton	PSE&G	RFC	1, 3												
6.	Doug Myers	PPLEU	RFC	1, 3												
7.	Tom Bowe	PJM Interconnection	RFC	2												
8.	Raj Rana	AEP	RFC	1, 3												
9.	Bob Fannin	Dayton Power and Light	RFC	1, 3												
10.	David Mahler	Duquesne Light	RFC	1, 3												
11.	Kenneth Keilholtz	RRI Energy	RFC	5												
12.	Stephen Kimish	PSEG Energy Resources and Trade	RFC	1, 3												
13.	Stephen C. Knapp	Constellation Energy	RFC	1, 3												
10.	Group	Howard Rulf	We Energies				X	X	X							
Additional Member Additional Organization Region Segment Selection																
1.	Tom Hawley															
2.	Rob Martin															
11.	Group	Jason Shaver	ATC and ITC		X											
Additional Member Additional Organization Region Segment Selection																
1.	Michael Ayotte	ITC	MRO	1												
12.	Group	Sam Ciccone	FirstEnergy		X		X	X	X	X						
Additional Member Additional Organization Region Segment Selection																
1.	Dave Folk	FirstEnergy	RFC	1, 3, 4, 5, 6												
2.	Doug Hohlbaugh	FirstEnergy	RFC	1, 3, 4, 5, 6												
3.	Steve Megay	FirstEnergy	RFC	1												
4.	John Martinez	FirstEnergy	RFC	1												
5.	Andy Hunter	FirstEnergy	RFC	1												
6.	John Reed	FirstEnergy	RFC	1												
7.	Jim Eckels	FirstEnergy	RFC	1												
8.	John Wilson	FirstEnergy	RFC	1												

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	Commenter	Organization				Industry Segment															
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9.	John TeSelle	FirstEnergy	RFC	3																	
10.	Larry Herman	FirstEnergy	RFC	3																	
11.	Kevin Querry	FirstEnergy	RFC	6																	
12.	Brian Orians	FirstEnergy	RFC	5																	
13.	Bill Duge	FirstEnergy	RFC	5																	
13.	Group	Richard Kafka	Pepco Holdings, Inc. - Affiliates				X		X		X	X									
Additional Member Additional Organization Region Segment Selection																					
1.	Dave Thorne	Potomac Electric Power Company	RFC	1																	
2.	Steve Alexander	Potomac Electric Power Company	RFC	1																	
3.	JB Rogers	Delmarva Power & Light	RFC	1																	
4.	Vic Davis	Delmarva Power & Light	RFC	1																	
5.	John Keller	Atlantic City Electric	RFC	1																	
6.	Paul Wassil	Conectiv Energy Supply, Inc	RFC	5																	
7.	Kara Dundas	Conectiv Energy Supply, Inc	RFC	5																	
14.	Group	JT Wood	Southern Company Transmission				X		X												
Additional Member Additional Organization Region Segment Selection																					
1.	SERC SOS	SERC	SERC																		
15.	Group	Kenneth D. Brown	PSEG Companies				X		X		X	X									
Additional Member Additional Organization Region Segment Selection																					
1.	Ron Wharton	PSE&G ESOC	RFC	1, 3																	
2.	Steve Kimmish	PSEG Energy Resources & Trade	RFC	6																	
3.	Dave Murray	PSEG Power LLC	RFC	5																	
4.	Dom DiBari	Odessa Power Partners	ERCOT	5																	
5.	Clint Bogan	PSEG Power Connecticut	NPCC	5																	
6.	Jim Hebson	PSEG ER&T	NPCC	6																	
16.	Group	Howard Gugel	NERC Staff																		
Additional Member Additional Organization Region Segment Selection																					

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			1	2	3	4	5	6	7	8	9	10								
1.	Laurel Heacock																			
2.	Bob Cummings																			
3.	Larry Kezele																			
4.	Ed Ruck																			
5.	Todd Thompson																			
6.	Mark Vastano																			
7.	Roman Carter																			
8.	Jule Tate																			
9.	David Taylor																			
10.	Maureen Long																			
11.	Andy Rodriguez																			
12.	Stephanie Monzon																			
13.	Steve Crutchfield																			
14.	Harry Tom																			
15.	Edd Dobrowolski																			
16.	Al McMeekin																			
17.	Group	Terry L. Blackwell	Santee Cooper																	
Additional Member Additional Organization Region Segment Selection																				
1.	S. T. Abrams	Santee Cooper	SERC	1																
2.	Glenn Stephens	Santee Cooper	SERC	1																
3.	Jim Peterson	Santee Cooper	SERC	1																
4.	Rene' Free	Santee Cooper	SERC	1																
5.	Vicky Budreau	Santee Cooper	SERC	1																
6.	Wayne Ahl	Santee Cooper	SERC	1																
18.	Group	Denise Koehn	Bonneville Power Administration																	
Additional Member Additional Organization Region Segment Selection																				
1.	Tedd Snodgrass	Transmission Dispatch	WECC	1																
2.	Tim Loepker	Transmission Dispatch	WECC	1																
3.	Jim Burns	Transmission Technical Operations	WECC	1																

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19.	Group	Ben Li	IRC Standards Review Committee		X										
		Additional Member	Additional Organization	Region	Segment	Selection									
		1. Bill Phillips	Midwest ISO	MRO	2										
		2. Al Dicaprio	PJM	RFC	2										
		3. Mark Thompson	AESO	WECC	2										
		4. Charles Yeung	SPP	SPP	2										
		5. Steve Myers	ERCOT	ERCOT	2										
		6. Matt Goldberg	ISO-NE	NPCC	2										
		7. Lourdes Estrada-Saliner	CAISO	WECC	2										
		8. Jim Castle	NYISO	NPCC	2										
20.	Group	Annette Bannon	PPL			X				X	X				
		Additional Member	Additional Organization	Region	Segment	Selection									
		1. Gary Bast	PPL Electric Utilities	RFC	1										
		2. Jon Williamson	PPL EnergyPlus	WECC	6										
		3. Mark Heimbach	PPL EnergyPlus	MRO	6										
		4. Mark Heimbach	PPL EnergyPlus	NPCC	6										
		5. Mark Heimbach	PPL EnergyPlus	RFC	6										
		6. Mark Heimbach	PPL EnergyPlus	SERC	6										
		7. Mark Heimbach	PPL EnergyPlus	SPP	6										
		8. Annette Bannon	PPL Generation	RFC	5										
		9. Annette Bannon	PPL Generation	NPCC	5										
		10. Annette Bannon	PPL Generation	WECC	5										
21.	Group	Frank Gaffney	Florida Municipal Power Agency (FMPA) and some members			X		X	X	X	X				
		Additional Member	Additional Organization	Region	Segment	Selection									
		1. Jim Howard	Lakeland Electric	FRCC	1, 3, 5										
		2. Cairo Venegas	Fort Pierce Utilitiiese Authority		1, 3, 4, 5										
22.	Group	Carol Gerou	MRO NERC Standards Review Subcommittee												X

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	Additional Member	Additional Organization	Region	Segment Selection										
1.	Chuck Lawrence	American Transmission Company	MRO	1										
2.	Tom Webb	WPS Corporation	MRO	3, 4, 5, 6										
3.	Terry Bilke	Midwest ISO Inc.	MRO	2										
4.	Jodi Jenson	Western Area Power Administration	MRO	1, 6										
5.	Ken Goldsmith	Alliant Energy	MRO	4										
6.	Alice Murdock	Xcel Energy	MRO	1, 3, 5, 6										
7.	Dave Rudolph	Basin Electric Power Cooperative	MRO	1, 3, 5, 6										
8.	Eric Ruskamp	Lincoln Electric System	MRO	1, 3, 5, 6										
9.	Joseph Knight	Great River Energy	MRO	1, 3, 5, 6										
10.	Joe DePoorter	Madison Gas & Electric	MRO	3, 4, 5, 6										
11.	Scott Nickels	Rochester Public Utilities	MRO	4										
12.	Terry Harbour	MidAmerican Energy Company	MRO	6, 1, 3, 5										
23.	Individual	Brent Ingebrigtsen	E.ON U.S. LLC		X		X	X	X	X				
24.	Individual	Silvia Parada-Mitchell	Transmission Owner		X				X	X				
25.	Individual	Sandra Shaffer	PacifiCorp		X		X		X	X				
26.	Individual	Robert Ganley	New York State Reliability Council											X
27.	Individual	Dania Colon	PEF		X									
28.	Individual	James Sharpe	South Carolina Electric and Gas		X		X		X	X				
29.	Individual	Martin Bauer	Bureau of Reclamation						X					
30.	Individual	Kasia Mihalchuk	Manitoba Hydro		X		X		X	X				
31.	Individual	Tim Hattaway	PowerSouth Energy						X					
32.	Individual	Joylyn Stover	Consumers Energy				X	X	X					

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33.	Individual	Jonathan Appelbaum	Long Island Power Authority	X										
34.	Individual	Richard Appel	Sunflower Electric Power Corp.	X		X		X						
35.	Individual	Kevin Koloini	American Municipal Power				X							
36.	Individual	Edward Bedder	Orange and Rockland Utilities, Inc.	X										
37.	Individual	Noman Williams	Sunflower Electric Power Corporation	X										
38.	Individual	Mark Ringhausen	Old Dominion Electric Cooperative			X	X	X						
39.	Individual	Misty Revenew	Westar Energy	X		X		X	X					
40.	Individual	Bob Casey	Georgia Transmission Corp	X										
41.	Individual	Tracy Sliman - System Operations Compliance	Tri-State Generation & Transmission Assoc.	X										
42.	Individual	Joe O'Brien	NIPSCO	X		X		X	X					
43.	Individual	Joe Knight	Great River Energy	X		X		X	X					
44.	Individual	Fred Meyer	The Empire District Electric Company	X		X		X						
45.	Individual	Ed Davis	Entergy Services	X		X		X	X					
46.	Individual	Gordon Rawlings	British Columbia Transmission Corporation	X										
47.	Individual	Greg Rowland	Duke Energy	X		X		X	X					
48.	Individual	Frank Cumpton	Transmission System Operations	X										
49.	Individual	Greg Mason	Dynegy					X						

Consideration of Comments on OPCP SDT — Project 2007-02

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				1	2	3	4	5	6	7	8	9	10	
50.	Individual	Dustin Smith	Washington City Light & Power			X								
51.	Individual	Kirit Shah	Ameren	X		X		X	X					
52.	Individual	Kathleen Goodman	ISO New England Inc.		X									
53.	Individual	Henry Masti	NYSEG	X										
54.	Individual	Jose Medina	NextEra Energy Resources, LLC					X						
55.	Individual	Dan Rochester	Independent Electricity System Operator		X									
56.	Individual	Daryl Curtis	Oncor Electric Delivery	X										
57.	Individual	Brady Baker	City Of Greenfield			X								
58.	Individual	James H. Sorrels, Jr.	American Electric Power	X		X		X	X					
59.	Individual	Alice Murdock	Xcel Energy	X		X		X	X					
60.	Individual	Laura Zotter	ERCOT ISO		X									X
61.	Individual	Leland McMillan	NorthWestern Energy	X		X								
62.	Individual	Saurabh Saksena	National Grid	X		X								
63.	Individual	Roger Champagne	Hydro-Québec TransEnergie	X										
64.	Individual	Brett Koelsch	Progress Energy Carolina, Inc	X		X		X						
65.	Individual	Scott Berry	Indiana Municipal Power Agency				X							
66.	Individual	Michael R. Lombardi	Northeast Utilities	X		X		X						
67.	Individual	Eric Olson	Transmission Agency of Northern California	X										

Consideration of Comments on OPCP SDT — Project 2007-02

		Commenter	Organization	Industry Segment										
				1	2	3	4	5	6	7	8	9	10	
68.	Individual	Darcy O'Connell	California Independent System Operator		X									
69.	Individual	Brandy A. Dunn	Western Area Power Administration	X						X				
70.	Individual	Catherine Koch	Puget Sound Energy	X										
71.	Individual	Michael Gammon	Kansas City Power & Light	X		X		X	X					

1. Do you agree with the adoption of the following new terms for inclusion in the NERC Glossary and their proposed definitions: Communications Protocol, Three-part Communication, and Interoperability Communication? If not, please explain in the comment area.

Summary Consideration:

Most commenters who responded to this question indicated all three of the proposed definitions were confusing and had little bearing on improving communication clarity. The SDT has removed all 3 definitions.

Based on these comments, the SDT deleted the term “Three-Part Communications” but will be covered in the requirements (R2 and R3) of second draft of the standard.

The OPCP SDT deleted “Interoperability Communications” and replaced it with “Operating Communications,” which is defined as:

“Communication of instruction to change or maintain the state, status, output, or input of an Element or Facility of the Bulk Electric System.”

The OPCP SDT also responded to comments that the definition of “Interoperability Communication” did not clearly indicate if it included internal communication (communication between functional entities of the same organization), external communication (communication between two or more functional entities not within the same organization), or both. The proposed definition of the new term “Operating Communication” includes communications that change or maintain the state, status, output, or input of any Element or Facility. As such, the term “Operating Communication” includes any communication that is requesting a change to the BES, regardless of whether the communicators are internal or external and regardless of whether the communications are oral or written.

Some commenters indicated concerned that the terms “facilities” and “elements,” were not capitalized in the proposed definition of Interoperability Communications. The defined terms “Facility” and “Element” are capitalized in the new proposed definition of Operating Communication.

The term “Communication Protocol” was never specifically mentioned in the standard so the SDT has eliminated it from the second draft of the standard.

Organization	Yes or No	Question 1 Comment
British Columbia Transmission	Agree	

Consideration of Comments on OPCP SDT — Project 2007-02

Organization	Yes or No	Question 1 Comment
Corporation		
Bureau of Reclamation	Agree	
ExxonMobil Research and Engineering	Agree	
NextEra Energy Resources, LLC	Agree	
NorthWestern Energy	Agree	
Oncor Electric Delivery	Agree	
PacifiCorp	Agree	
Puget Sound Energy	Agree	
South Carolina Electric and Gas	Agree	
Sunflower Electric Power Corporation	Agree	
Transmission Owner	Agree	
Western Area Power Administration	Agree	
Xcel Energy	Agree	
Washington City Light & Power	Disagree	
ATC and ITC	Disagree	ATC believes that the proposed definition for the term “Interoperability Communication” is too broad and

Organization	Yes or No	Question 1 Comment
		<p>ambiguous. We recommend the following: “Communication between two or more Functional Entities (not within the same organization) to exchange reliability-related information to be used by the entities to change the state or status of Facilities of the Bulk Electric System.” The inclusion of the terms “Functional Entities” and “Facilities” removes the ambiguity which we believe is contained in the proposed definition. (Both of these terms are defined in NERC’s Glossary) In addition, the inclusion of the phrase “not within the same organization” clarifies that the focus of definition is to address communication between different Functional Entities.</p> <p>Response: We agree with most of your comments. The SDT is eliminating the term “Interoperability Communications” because of comments citing ambiguity. We have revised the draft standard by defining the new term “Operating Communications.” With this new definition including all communications that change or maintain the state, status, output, or input of an Element or Facility of the Bulk Electric System, the SDT believes it has removed any ambiguity over the utilization of communication protocols between or among Functional Entities in the same or in other organizations.</p> <p>ATC understands that this Drafting Team is working closely with the Drafting Team working on Project 2006-06 and believes that this team needs to use the term “Reliability Directive” as a replacement for the term “directive” which is currently being used. The Drafting Team working on Project 2006-06 has defined Reliability Directive as: “A communication initiated by a Reliability Coordinator, Transmission Operator or Balancing Authority where action by the recipient is necessary to address an actual or expected Emergency.”</p> <p>Response: The current draft version of COM-003-1 does not use the terms “directive” or “Reliability Directive,” instead using the new term “Operating Communications.” The SDT is working to coordinate with Project 2006-06 to eliminate any potential conflicts between the standards.</p>
<p>Response: The SDT thanks you for your comments. Please see our responses above.</p>		
Bonneville Power Administration	Disagree	<p>BPA does not agree with the aspects of Interoperability Communications.</p> <p>We do not need a common time standard.</p> <p>Why use the NATO Standard. This could add a lot of time to a directive that needs to be given immediately.</p> <p>The 3 part communication is already used by BPA.</p>

Organization	Yes or No	Question 1 Comment
<p>Response: The SDT thanks you for your comments.</p> <p>1. The SDT has eliminated the term Interoperability Communications.</p> <p>2 The SDT is proposing an alternative to a single time zone that should address your concern. In the second draft of the standard references to time zones are only required when those involved in the communication are in different time zones.</p> <p>3. The SDT is proposing the use of a correct alpha-numeric clarifier instead of explicitly requiring the use of the NATO phonetic alphabet, and does not agree that it would add an inordinate amount of time to communications.</p> <p>4 The SDT acknowledges BPA’s use of three-part communications.</p>		
<p>Orange and Rockland Utilities, Inc.</p>	<p>Disagree</p>	<p>Clarification must be made to the definition "Interoperability Communication" and to the specific applicability of the term as it translates into the actions and functions both internal and external to the local TO.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT is eliminating the term Interoperability Communications because of comments citing ambiguity. We have revised the draft standard by defining the new term “Operating Communications.” With this new definition including all communications that change or maintain the state, status, output, or input of an Element or Facility of the Bulk Electric System, the SDT believes it has removed any ambiguity over the utilization of communication protocols between or among Functional Entities in the same or in other organizations.</p>		
<p>Manitoba Hydro</p>	<p>Disagree</p>	<p>Comments:</p> <p>Agree to the adoption, but not the definitions as defined.</p> <p>1. Communication Protocol - Remove “written” from this definition. Create a new standard that defines “written” protocol, i.e.: express “24 hour format”, common date format, etc.</p> <p>Response: “Communication Protocol” has been removed as a defined term. The SDT believes references to written protocols in some elements of the requirements are justified and these have been retained in the revised standard.</p> <p>a) Using “written” in this definition and which is also used in COM-003-1 R2, R3, R4 and R7 clouds both the Definition and the Standard. The majority of COM-003-1 requirements also focus on the spoken word, such as the use of English, Phonetics and Three-way Communication.</p> <p>Response: The SDT believes “written” is appropriate in some cases, and has chosen to retain it. Operating Communications can be “written” in some cases, and use of these protocols in those cases will add clarity.</p>

Organization	Yes or No	Question 1 Comment
		<p>b) “Communications” in the Definition infers verbal communication especially when examining the COM-003-1 Standard where its purpose is “timely information in alerts and emergencies”.</p> <p>Response: The SDT respectfully disagrees that “Communications” in the definition applies <u>solely</u> to verbal communication. The SDT has removed the proposed definition “Interoperability Communications” and proposes a new definition, “Operating Communication.” The requirements in the draft standard specify when protocols are required for written, oral or both types of communication.</p> <p>c) When COM-001-1 R4 “English” and COM-002-2 R2 “Three-way” requirements are amalgamated into COM-003-1, the COM-003-1 standard will now strengthen the focus on the process of verbal communications.</p> <p>Response: The SDT agrees with your comments.</p> <p>d) COM-003-1 R2 “Uniform Line Identifiers” This requirement would be used in real time reliability situations, alerts and emergencies. The “written” communications would be used after the fact and therefore “written” does not belong in the definition.</p> <p>Response: The SDT questions if you meant R7 instead of R2 as written. Nonetheless, the SDT believes utilizing uniform line identifiers for interface Elements/Facilities for both oral and written communications adds clarity and contributes to the accuracy of operating instructions.</p> <p>e) In COM-003-1 R3 “use English” The purpose of this standard is convey information effectively during alerts and emergencies. “Written” would be used after the fact and therefore does not belong here.</p> <p>Response: The SDT does not agree the purpose of this standard is to <u>only</u> convey information effectively during alerts and emergencies, and also does not agree that written communication is necessarily “after the fact” communication“. The revised standard requires English in both written and oral “Operating Communications” when communicating between functional entities, unless another language is mandated by law or regulation.</p> <p>f) In COM-003-1 R4 “24 hour format” “Written” could be reserved for a new standard, which could which define “24 hour format” along with a common date format which is also needed.</p> <p>Response: The SDT believes the requirement for use of 24 hour format should apply to both oral and written communication, and sees no need to create a separate standard. The term 24 hour format is commonly understood and does not require definition. With real-time communications, the SDT does not believe it is necessary to include a common date format.</p> <p>g) In COM-003-1 R5 “Three-part Communication” Focuses entirely on the spoken word and appears</p>

Organization	Yes or No	Question 1 Comment
		<p>appropriate that “written” is not used here. Response: The SDT agrees with the comment, and the revised draft standard clarifies that three part communication is only required for oral communication.</p> <p>h) In COM-003-1 R6 “Phonetics” Focus on the spoken word and would never be used to empathize a written word and is appropriate that is not used here. Response: The SDT agrees with your comment and has modified the standard to clearly indicate phonetic clarifiers are only required for oral communications.</p> <p>i) COM-003-1 R7 states “Operating State Levels” All communications for broadcasting these alerts would typically be verbal. “Written” communications would be after the fact. Response: The SDT believes that Operating State levels could be written or oral. Note, however, that based on stakeholder comments, the SDT has removed Requirement R2 from the second draft of the standard. In addition, written communication is not always after the fact.</p> <p>2. Three-part Communication - Use COM-002-2 R2 requirement as an improved basis for the “Three-part Communication” glossary term and define each part of the three parts separately.</p> <p>a) This new NERC Glossary term is better defined in the COM-002-2 R2 “Three-part communication” requirement.” Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall issue directives in a clear, concise, and definitive manner; shall ensure the recipient of the directive repeats the information back correctly; and shall acknowledge the response as correct or repeat the original statement to resolve any misunderstandings.”</p> <p>b) The current glossary term is overwhelming and confusing with the “back and forth” exchange of responsibilities. More thought process is consumed trying to break down the definition into usable portions, then comprehending the definition itself.</p> <p>c) The glossary term should be more clearly defined by specifying each of the three part communication protocol;</p> <p>i. An initiating party verbally issues directives in a clear, concise and definitive manner.</p>

Organization	Yes or No	Question 1 Comment
		<p>ii. The receiving party shall replicate the intent of the directive and</p> <p>iii. The initiating party shall acknowledge to their satisfaction that the receiving party fully understands and is</p> <p>c.</p> <p>capable of carrying out the directive.</p> <p>Response: The SDT has removed the definition for “Three-part Communication” from the second draft of the standard and has instead included the details of implementing three-part communication in Requirements R2 and R3 in the second draft of COM-003-1.</p> <p>3. Interoperability Communication - Define further and/or define entities. Expand “interoperability” and add and define “entity”</p> <p>a) Using “interoperability” and “entities” in same glossary term, clouds the definition especially when this glossary term is used to help clarify requirements in COM-003-1. There are at least three possible levels of “Interoperability” from a Control Center point of view;</p> <p>i. Internally, within a utility.-Communication between the Balancing Authority and Transmission for reliability purposes (within control center).-Between BA, TO, TOP, GO, TSP, LSE and DP, such as between the sending and receiving end of an HVDC terminal.</p> <p>ii. Externally, between neighbouring utilities.</p> <p>iii. Externally, between the Balancing Authority and their Reliability Coordinator. For a Reliability Coordinator two more levels of “Interoperability” could be added:</p> <p>iv. Communication between Reliability Organizations.</p> <p>v. Communication between the three major interconnections.</p> <p>b) Though the glossary definition surely includes all of the above, it does not clarify that and becomes immediately clouded when interpreting COM-003-1 R1 where “personnel” is used for real time control for effective Interoperability Communication.1. Personnel - individual responsible for the operation of the interconnected bulk electrical system (real time, planning, etc)c Adding and defining Entity in the glossary as per suggestions;</p> <p>i. “Entities” are used commonly in the Reliability Standards and encompasses a lot of different contexts.</p> <p>ii. “Entity” defined by a dictionary includes a comprehensive range such as:-body-Unit-Group-Thing-Article</p>

Organization	Yes or No	Question 1 Comment
		<p>iii. Entity in a interoperable power system:- BA, TO, GO, TSP, LSE, etc- Neighbouring BA, Control Area, Neighbour (Utility)- Reliability Coordinator, MISO, Reserve sharing Group, etc- NERC, MRO, WECC, NPCC, ERCOT, etc- Western Interconnection, Eastern Interconnection, ERCOT.</p> <p>Response: The SDT has eliminated the term “Interoperability Communications” because of comments citing ambiguity. We have revised the draft standard by defining the new term “Operating Communications.” With this new definition including all communications that change or maintain the state, status, output, or input of an Element or Facility of the Bulk Electric System, the SDT believes it has removed any ambiguity over the utilization of communication protocols between or among Functional Entities in the same or in other organizations.</p>
<p>Response: The SDT thanks you for your comments. Please see our responses above.</p>		
<p>New York State Reliability Council</p>	<p>Disagree</p>	<p>Comments:</p> <p>NYSRC agrees with the definitions for Communication Protocol.</p> <p>Response: “Communication Protocol” has been removed as a definition as it was not used except in the title of the standard.</p> <p>NYSRC disagrees with the definition for Three-Part Communication. NYSRC prefers the process offered in COM-002-03 (draft). In COM-003 the listener must understand the communication the first time. Failure to understand and repeat back correctly could be a violation of the requirement. The intent three part communication is to have an iterative process whereby the person issuing the message is ultimately satisfied that the recipient understands the information and will perform the required action. It should not be defined as three steps and only three steps.</p> <p>NYSRC offers the following definition: A Real-Time Operating Communications Protocol where information is verbally stated by a party initiating a communication, the information is repeated back to the party that initiated the communication by the second party that received the communication, and the information is verbally confirmed to be correct or corrected by the party who initiated the communication. The protocol should be followed until the party issuing the information is satisfied that a party receiving the information has understood the communication and confirmed it.</p> <p>Response: The SDT has removed the definition for “Three-part communication” and has included revised language for the protocol in the second draft of COM-003-1 Requirements R2 and R3. Requirements R2</p>

Organization	Yes or No	Question 1 Comment
		<p>and R3 in the second draft of the standard addresses your concerns.</p> <p>NYSRC disagrees with the definition of Interoperability Communication. NYSRC believes the Standard is addressing the communication of the Operating State of BES equipment and facilities. The proposed definition utilizes the phrase “change the state ... of a BES facility” which can be interpreted as the position, e.g. open, close, tap position, etc., thereby extending this Standard into routine switching and operation of the BES. The SAR stated this Standard was “to use specific communications protocols under normal, abnormal and emergency conditions to relay critical reliability-related information in a timely and effective manner”. The proposed definition can be interpreted in a manner that extends this to all reliability related information for every BES operation</p> <p>Response: The SDT has addressed your concerns by eliminating the term “Interoperability Communications” and revised the draft standard to include the new term “Operating Communications,” which includes all communications that change or maintain the state, status, output, or input of an Element or Facility of the Bulk Electric System. However, please note the SDT believes that even routine switching could affect reliability if proper communications protocols are not used.</p> <p>The drafting team should also consider adding a definition for Directive or acknowledge the definition in draft Com-002-03.</p> <p>Response: The second draft version of COM-003-1 does not use the terms “directive” or “Reliability Directive,” instead using the new term “Operating Communications.” The SDT is working to coordinate with Project 2006-06 to eliminate any potential conflicts between the standards.</p>
<p>Response: The SDT thanks you for your comments. Please see our comments above.</p>		
NRECA RTF Members	Disagree	<p>Comments:</p> <p>We agree with the new terms for inclusion in the NERC Glossary.</p> <p>We are somewhat concerned that in this version of the draft standard there was no definition for “directive” included. We do understand that the term “directive” is no longer capitalized in this version of the standard, therefore, not required to be included in the NERC Glossary. Since several requirements of this draft standard require certain actions when a “directive” is issued, the term should be defined. It is necessary to</p>

Organization	Yes or No	Question 1 Comment
		define the term “directive” to ensure that just normal conversations between entities are not later “interpreted” to be a “directive”.
<p>Response: The SDT thanks you for your comments.</p> <p>Response: The second draft version of COM-003-1 does not use the terms “directive” or “Reliability Directive,” instead using the new term “Operating Communications.” The SDT is working to coordinate with Project 2006-06 to eliminate any potential conflicts between the standards.</p>		
Pacific Northwest Small Utilities Comment Group	Disagree	Communication protocols extend beyond the verbal and written versions. How does the “non-routable (communication) protocol” of CIP-006 fit into or not fit into these definitions?
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT feels “non-routable (communication) protocol” of CIP-006 falls outside of the scope of the COM-003-1 standard, which deals with oral and written Operating Communications. If you feel it is within the scope, please elaborate.</p>		
Consumers Energy	Disagree	Communications Protocol and Three Part Communications have been used in the industry and are acceptable. There seems to be a better way of stating “informational” communications since Directives are already discussed.
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT agrees with your statements, and has revised the draft of COM-003-1 to eliminate the previous definitions. The SDT is proposing a new term, “Operating Communications,” which includes all communications that change or maintain the state, status, output, or input of an Element or Facility of the Bulk Electric System.</p>		
We Energies	Disagree	<p>Communications Protocol: This defined term appears only in the Three-part Communication definition and in titles. Titles are expected to be capitalized and are not necessarily the defined term. The COM-003-1 Standard title is “Operating Personnel Communications Protocols”, but the purpose is not restricted to verbal and written information, so “Communications Protocol” does not seem to refer to the defined term in this title. Similarly, it is not necessarily the defined term in CPOP. It is not clear where this definition is being utilized in the standard.</p> <p>Response: The SDT agrees and has removed the definition of “Communications Protocol.”</p>

Organization	Yes or No	Question 1 Comment
		<p>Three-Part Communication: Should be required for “Reliability Directives” only. It seems that this is currently being addressed, and could remain, in an updated version of COM-002-003. This should be coordinated between standards and duplication should be avoided.</p> <p>Response: The SDT disagrees that three-part communication should be used only for Reliability Directives. Miscommunications occur during routine operations and the impact on reliability can be the same. The SDT is working to coordinate with Project 2006-06 to eliminate any potential conflicts between the standards.</p> <p>Interoperability Communication: This definition is excessively broad, and the terminology “reliability related information” is ambiguous and vague. Communication is used elsewhere within the NERC Standards to include voice, data, email, memos, NERCnet, etc. Since communication of any type may be used to change the “state or status” of the Bulk Electric System, this definition seems to pertain to every communication in every form, which could be interpreted to include market information which is continuously used to drive changes to the “state or status”.</p> <p>Response: The SDT has eliminated the term “Interoperability Communication,” and replaced it with the term “Operating Communications.” With this new definition including all communications that change or maintain the state, status, output, or input of an Element or Facility of the Bulk Electric System, the SDT believes it has removed any ambiguity over the utilization of communication protocols between or among Functional Entities in the same or in other organizations.</p> <p>By extension, a CPOP would need to include every communication of any type (voice, data, email, memos, etc.), which is over-reaching and open to conflict with the CPOP’s developed independently by other entities. Interoperability Communications should apply only to situations covered in Attachment 1, and definitions should better reflect applicability to communications between separate, distinct entities (not communications within the same organization).</p> <p>Response: The SDT has removed the CPOP requirement and Interoperability Communication from the second version of the draft COM-003-1 standard.</p>
<p>Response: The SDT thanks you for your comments. Please see our responses above.</p>		

Organization	Yes or No	Question 1 Comment
<p>MRO NERC Standards Review Subcommittee</p>	<p>Disagree</p>	<p>Concerning Three Part Communications: Please clarify by answering the following. Does the word “correctly” mean repeating back word for word or would paraphrasing the intent of the message received prove that the receiving party understands the intent and specific action of what they are required to accomplish?</p> <p>Response: The second draft of the Standard has been modified to address this by adding the phrase “not necessarily verbatim”.</p> <p>Please verify that Three Part Communications will be required when issuing directives related to emergency situations, and not every time communications is required between two parties.</p> <p>Response: In the second draft, three-part communication is required any time that verbal communication is intended to change or maintain the state or status of the BES.</p> <p>We believe the proposed definition for the term “Interoperability Communication” is too broad and ambiguous. We recommend the following instead:</p> <p>“Communication between two or more Functional Entities (not within the same organization) to exchange reliability-related information to be used by the entities to change the state or status of Facilities of the Bulk Electric System.”</p> <p>The inclusion of the terms “Functional Entities” and “Facilities” removes the ambiguity which we believe is contained in the proposed definition. (Both of these terms are defined in NERC’s Glossary) In addition, the inclusion of the phrase “not within the same organization” clarifies that the focus of definition is to address communication between different Functional Entities.</p> <p>Response: Your definition approximates the proposed definition of “Operating Communication” — Communication of instruction to change or maintain the state, status, output, or input of an Element or Facility of the Bulk Electric System. The SDT believes flawed operating communication within the same organization can impact the reliability of the BES during normal operations. With this new definition of “Operating Communications” including all communications that change or maintain the state, status, output, or input of an Element or Facility of the Bulk Electric System, the SDT believes it has removed any ambiguity over the utilization of communication protocols between or among Functional Entities in the same or in other organizations.</p>

Organization	Yes or No	Question 1 Comment
		<p>The way the definition of Three-part Communication is worded applies only when the communication is understood by the listener the first time. Because the definition requires the listener to repeat the information back correctly, failure of the listener to understand the information the first time could be construed as a violation or at least not fitting the definition. The definition should rather reflect that three-part communication is an iterative process that should be followed until the listener is confirmed by the speaker to get the information correct. We suggest the definition be revised as follows:</p> <p>A Communications Protocol where information is verbally stated by a party initiating a communication, the information is repeated back to the party that initiated the communication by the second party that received the communication, and the same information is verbally confirmed to be correct or corrected by the party who initiated the communication. The protocol should be followed until the party issuing the information is satisfied that a party receiving the information has understood the communication and confirmed it.</p> <p>Response: The SDT has eliminated the definition of three-part communication and has incorporated the performance of three-part communication into the language of Requirements R2 and R3 in the second draft of COM-003. Those modifications incorporate many of your recommendations.</p> <p>We believe there should be a definition added for “Directive” as orders given in an emergency situation. Directive, as currently used in the industry, is understood to mean an emergency situation and the party issuing the “Directive” states as such, so everyone knows it is an emergency situation. In the “Disposition of Requirements identified in the SAR for Operations Communications Protocols as Possibly Needing either Modification or Movement” document included with the proposed standard, it is stated that COM-002-2, R2 is being modified in Project 2006-06 to include a new definition for “Reliability Directive” and that it is to be included in the NERC Glossary. It also states that when it is completed, it will be moved into COM-003-1 and COM-002-3 will be deleted. It is our opinion that the definition of Reliability Directive must be included in the review and approval of COM-003-1, as it is central to many of the actions to be taken. We understand that the SDT is working closely with the Drafting Team working on Project 2006-06 and believe that this team needs to use the term “Reliability Directive” as a replacement for the term “directive” which is in the current version of COM-003-1. The Drafting Team working on Project 2006-06 has defined Reliability Directive as: “A communication initiated by a Reliability Coordinator, Transmission Operator or Balancing Authority where action by the recipient is necessary to address an actual or expected Emergency.” The NSRS recommends use</p>

Organization	Yes or No	Question 1 Comment
		<p>of this definition and the term “Reliability Directive” as opposed to “directive”.</p> <p>The second draft version of COM-003-1 does not use the terms “directive” or “Reliability Directive,” instead using the new term “Operating Communications.” The SDT is working to coordinate with Project 2006-06 to eliminate any potential conflicts between the standards.</p>
<p>Response: The SDT thanks you for your comments. Please see our responses above.</p>		
E.ON U.S. LLC	Disagree	<p>For the Communication Protocol definition, please clarify if “written” includes electronic (email.) Change the definition of “Interoperability” to “Emergency” Entities should not be required to use 3 part communications on a routine basis, only on emergency issues.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The second draft of the standard removes the proposed definition “Communications Protocol” and proposes a new definition for the term “Operating Communications” which will apply to all communications to alter or maintain the state of the BES. An email message is one example of written Operating Communications.</p> <p>The OPCP SDT disagrees with the concept of only requiring three part communication solely in emergency conditions. Mistakes due to poor communication can also occur during routine operations. Blackout Report Recommendation #26 states communication protocols should be tightened especially those for alerts and emergency communications, but does not recommend they be tightened <i>only</i> for alert and emergency conditions. FERC Order 693 P531 directed communication protocols be tightened, and suggested a new COM Reliability Standard as an acceptable approach. The SAR for this SDT charged the team to “tighten communication protocols, especially for communications during alerts and emergencies,” but did not rule out improving all communications as a way of meeting the objective of the SAR. Additionally the SAR required “the use of specific communication protocols, enabling information to be efficiently conveyed and mutually understood for all operating conditions.”</p>		
American Electric Power	Disagree	<p>Given that Three-part Communications is required when using a directive, a “directive” must be clearly defined. Without this determination, the definitions are incomplete.</p> <p>Response: The second draft version of COM-003-1 does not use the terms “directive” or “Reliability Directive,” instead using the new term “Operating Communications.” The SDT is working to coordinate with Project 2006-06 to eliminate any potential conflicts between the standards.</p> <p>There are undefined conditions, such as conference calls with multiple parties. Does each participant repeat back in three-part?</p>

Organization	Yes or No	Question 1 Comment
		<p>Response: The SDT clarified that the use of three-part communication is limited to instances involving oral, person-to-person communication.</p> <p>Also, the definitions do not address communication of directives that are made in a non-oral format. This is an important area to address in this standard.</p> <p>Response: The second draft of the standard provides clarity on which protocols apply to both written and oral Operating Communications and which protocols apply only to oral Operating Communications.</p> <p>Lastly, please expand “entities” in the Interoperability Communication definition to be “NERC registered functional entities.” We are concerned that the definition is much too broad and may expand the scope of required communication beyond alerts and emergencies.</p> <p>Response: The SDT is eliminating the term “Interoperability Communications” because of comments citing ambiguity. We have revised the draft standard by defining the new term “Operating Communications.” With this new definition including all communications that change or maintain the state, status, output, or input of an Element or Facility of the Bulk Electric System, the SDT believes it has removed any ambiguity over the utilization of communication protocols between or among Functional Entities in the same or in other organizations.</p> <p>The SDT is addressing more than just alerts and emergencies. Blackout Report Recommendation #26 states communication protocols should be tightened, “especially” those for alerts and emergency communications, but does not recommend they be tightened <i>only</i> for alert and emergency conditions. The SAR for this SDT charged the team to “tighten communication protocols, especially for communications during alerts and emergencies,” but did not rule out improving all communications as a way of meeting the objective of the SAR. Mishaps due to miscommunication can and do occur during routine operations, and have the potential to negatively impact reliability.</p>
<p>Response: The SDT thanks you for your comments. Please see our responses above.</p>		
Great River Energy	Disagree	<p>GRE believes the proposed definition for the term Interoperability Communication is too broad and ambiguous. We recommend the following instead:</p> <p>Communication between two or more Functional Entities to exchange reliability-related information to be</p>

Organization	Yes or No	Question 1 Comment
		<p>used by the entities to change the state or status of Facilities of the Bulk Electric System.</p> <p>The inclusion of the terms Functional Entities and Facilities removes the ambiguity which we believe is contained in the proposed definition. (Both of these terms are defined in NERC’s Glossary)</p> <p>Response: Your definition approximates the new proposed definition of “Operating Communication” — Communication of instruction to change or maintain the state, status, output, or input of an Element or Facility of the Bulk Electric System. The SDT believes flawed operating communication within the same organization can impact the reliability of the BES.</p> <p>The way the definition of Three-part Communication is worded applies only when the communication is understood by the listener the first time. Because the definition requires the listener to repeat the information back correctly, failure of the listener to understand the information the first time could be construed as a violation or at least not fitting the definition. The definition should rather reflect that three-part communication is an iterative process that should be followed until the listener is confirmed by the speaker to get the information correct. We suggest the definition be revised as follows:</p> <p>A Communications Protocol where information is verbally stated by a party initiating a communication, the information is repeated back correctly to the party that initiated the communication by the second party that received the communication, and the same information is verbally confirmed to be correct or corrected by the party who initiated the communication. The protocol should be followed until the party issuing the information is satisfied that a party receiving the information has understood the communication and confirmed it.</p> <p>Response: The SDT has eliminated the definition of three-part communication and has incorporated the performance of three-part communication into the language of Requirements R2 and R3 in the second draft of COM-003.</p> <p>GRE believes there should be a definition added for Reliability Directive to ensure consistency across the defined projects for standards development. The Drafting Team working on Project 2006-06 has defined Reliability Directive as: A communication initiated by a Reliability Coordinator, Transmission Operator or Balancing Authority where action by the recipient is necessary to address an actual or expected Emergency.</p>

Organization	Yes or No	Question 1 Comment
		<p>GRE recommends use of this definition and the term Reliability Directive as opposed to Directive.</p> <p>Response: The term Reliability Directive is being developed under NERC Project 2006-06 Reliability Coordination. The current draft version of COM-003-1 does not use the terms “directive” or “Reliability Directive,” instead using the new term “Operating Communications.” The SDT is working to coordinate with Project 2006-06 to eliminate any potential conflicts between the standards.</p>
<p>Response: The SDT thanks you for your comments. Please see our responses above.</p>		
Sunflower Electric Power Corp.	Disagree	<p>I feel the use of the NATO phonetic alphabet is over kill. You should use a phonetic alphabet that is in common use in the USA</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT has considered your comments and has changed the standard to permit the use of any correct alpha-numeric clarifiers. The North Atlantic Treaty Organization phonetic alphabet is in common use in the US Military, many police and fire organizations, and the US airline industry.</p>		
Power South Energy	Disagree	<p>Inoperability definition is too broad and not clear.</p>
<p>Response: The SDT thanks you for your comments. The definition for “Interoperability Communication” has been removed and a new definition has been proposed for the term “Operating Communications” in the second draft of the standard.</p>		
National Grid	Disagree	<p>Interoperability Communication: Virtually all communications in a control room environment deal with changing the state or status of an element of facility, as such there is not a need to define this communication protocol. However, addition of “real time communication” in the definition will to an extent address the issue. The definition should be revised as follows:</p> <p>Real Time Communication between two or more entities to exchange reliability-related information to be used by the entities to change the state or status of an element or facility of the Bulk Electric System.</p> <p>Response: Your definition approximates the proposed definition of “Operating Communication” — Communication of instruction to change or maintain the state, status, output, or input of an Element or Facility of the Bulk Electric System. The SDT believes flawed operating communication within the same organization can impact the reliability of the BES.</p> <p>Three-part Communication: The way the definition of Three-part Communication is worded applies only</p>

Organization	Yes or No	Question 1 Comment
		<p>when the communication is understood by the listener the first time. Because the definition requires the listener to repeat the information back correctly, failure of the listener to understand the information the first time could be construed as a violation or at least not fitting the definition. The definition should rather reflect that three-part communication is an iterative process that should be followed until the listener is confirmed by the speaker to get the information correct.</p> <p>We suggest the definition be revised as follows:</p> <p>A Real-Time Operating Communications Protocol where information is verbally stated by a party initiating a communication, the information is repeated back correctly to the party that initiated the communication by the second party that received the communication, and the same information is verbally confirmed to be correct or corrected by the party who initiated the communication. The protocol should be followed until the party issuing the information is satisfied that a party receiving the information has understood the communication and confirmed it.</p> <p>Response: The SDT has eliminated the definition of three-part communication and has incorporated the performance of three-part communication into the language of Requirements R2 and R3 in the second draft of COM-003.</p>
<p>Response: The SDT thanks you for your comments. Please see our responses above.</p>		
Indiana Municipal Power Agency	Disagree	<p>It is not clear in the definition of Interoperability Communication if this is communication between two outside entities (two different companies) or could apply to communication between two entities within the same company. For example, communication between a company's generation plant and the same company's dispatcher.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT is eliminating the term Interoperability Communications because of comments citing ambiguity. We have revised the draft standard by defining the new term “Operating Communications.” With this new definition requiring the protocols for all operations that change or maintain the state, status, output, or input of an Element or Facility of the Bulk Electric System, the SDT believes it has removed any ambiguity over the utilization of communication protocols between or among Functional Entities in the same or in other organizations.</p>		
Long Island Power Authority	Disagree	<p>LIPA disagrees with the definition for Three-Part Communication. LIPA prefers the process offered in COM-002-03 (draft). In COM-003 the listener must understand the communication the first time. Failure to understand and repeat back correctly could be a violation of the requirement. The intent three part</p>

Organization	Yes or No	Question 1 Comment
		<p>communication is to have an iterative process whereby the person issuing the message is ultimately satisfied that the recipient understands the information and will perform the required action. It should not be defined as three steps and only three steps.</p> <p>LIPA offers the following definition:</p> <p>A Real-Time Operating Communications Protocol where information is verbally stated by a party initiating a communication, the information is repeated back to the party that initiated the communication by the second party that received the communication, and the information is verbally confirmed to be correct or corrected by the party who initiated the communication. The protocol should be followed until the party issuing the information is satisfied that a party receiving the information has understood the communication and confirmed it.</p> <p>Response: The SDT has eliminated the definition of three-part communication and has incorporated the performance of three-part communication into the language of Requirements R2 and R3 in the second draft of COM-003. The new language incorporates much of your suggestion.</p> <p>LIPA disagrees with the definition of Interoperability Communication. LIPA believes the Standard is addressing the communication of the Operating State of BES equipment and facilities. The proposed definition utilizes the phrase “change the state ... of a BES facility” which can be interpreted as the position, e.g. open, close, tap position, etc... thereby extending this Standard into routine switching and operation of the BES. The SAR stated this Standard was “to use specific communications protocols under normal, abnormal and emergency conditions to relay critical reliability-related information in a timely and effective manner”. The proposed definition can be interpreted in a manner that extends this to all reliability related information for every BES operation.</p> <p>Response: The definition for “Interoperability Communication” has been removed. The SDT believes flawed operating communication within the same organization and during normal or routine operations can detrimentally impact the reliability of the BES.</p> <p>The drafting team should also consider adding a definition for Directive or acknowledge the definition in draft Com-002-03.</p> <p>Response: The term Reliability Directive is being developed under NERC Project 2006-06 Reliability</p>

Organization	Yes or No	Question 1 Comment
		<p>Coordination. The current draft version of COM-003-1 does not use the terms “directive” or “Reliability Directive,” instead using the new term “Operating Communications.” The SDT is working to coordinate with Project 2006-06 to eliminate any potential conflicts between the standards.</p>
<p>Response: The SDT thanks you for your comments. Please see our responses above.</p>		
NERC Staff	Disagree	<p>NERC staff recommends that the term “Communications Protocol” be removed from the definition section because the term is only used in the title and in another definition. In addition, the definition adds no additional clarity than can be provided by a commonly used definition of the terms.</p> <p>Response: The term “Communication Protocol” has been eliminated from the standard.</p> <p>Similarly, the term “Three-part Communication” can be removed since it is used in only one requirement, and the definition can be incorporated in the requirement.</p> <p>Furthermore, Three-part Communication refers to a process or procedure, not a term. NERC staff recommends that the term “Interoperability Communication” be modified to “Operating Communication” with the definition of “communication with the intent to change or maintain the state, status, output, or input of an Element or Facility of the Bulk Electric System.” This captures all communication that affects BES reliability, not just communication between function entities.</p> <p>Response: The proposed definitions in the previous draft have been removed and the new term “Operating Communications” has been proposed.</p>
<p>Response: The SDT thanks you for your comments. Please see our responses above.</p>		
PEF	Disagree	<p>PEF does not agree with the adoption of the proposed term “Interoperability Communication”. The term “Reliability Communication” should be used instead. The proposed term “Interoperability Communication” is defined such that it applies to a state or status change of an element or facility of the BES - but there are many reliability-related communications which do not necessarily apply to a state or status change.</p>
<p>Response: The SDT thanks you for your comments and your recommendation.</p> <p>The proposed term “Interoperability Communication” has been removed from the previous draft of the standard. Instead the SDT is proposing the new term “Operating Communications” to focus on the communications that change or maintain the state of the BES.</p>		
Pepco Holdings, Inc. -	Disagree	<p>PHI believes the proposed definition for the term Interoperability Communication is too broad and</p>

Organization	Yes or No	Question 1 Comment
Affiliates		<p>ambiguous. It is inconsistent with the effort to develop results based standards which would have an effect in the reliability of bulk electric system.</p> <p>Additionally, PHI does not see the need of a definition of Interoperability Communication now that the term Reliability Directive has been defined in draft standard COM-002-3 which is currently posted for review.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The proposed term “Interoperability Communication” has been removed from the standard. Instead the SDT is proposing the new term “Operating Communications” to focus on the communications that change or maintain the state of the BES.</p> <p>The SDT does not believe its work to be inconsistent with results-based principles. The Need or Problem Statement for this standard is that miscommunication can lead to action or inaction harmful to the reliability of BES. This was identified by the NERC President in his January 2011 report to the industry as one of the eight top priority issues for BPS reliability, and there are a number of events that have occurred in the past where miscommunication was a contributing factor to the event or exacerbated the severity of the event. The Goal, therefore, is to specify clear, formal and universally applied communication protocols that reduce the possibility of miscommunication. The key Objective to accomplish this Goal is to use communication protocols to reduce or correct misunderstandings. The requirements have been written to accomplish this Objective, and are risk-mitigating requirements (while operator performance is measured, the actions themselves are primarily designed to mitigate the risk of miscommunication that could lead to poor BES performance). We believe this standard is consistent with results-based principles, and it will improve the reliability of the BES.</p> <p>The SDT believes the term Reliability Directives as defined in COM 002-03 does not fully address the range of miscommunication risks that could seriously impact the reliability of the BES.</p>		
American Municipal Power	Agree	Please define "directive" as a term.
<p>Response: The SDT thanks you for your comments. The second draft version of COM-003-1 does not use the terms “directive” or “Reliability Directive,” instead using the new term “Operating Communications.” The SDT is working to coordinate with Project 2006-06 to eliminate any potential conflicts between the standards.</p>		
The Empire District Electric Company	Disagree	<p>Replace the proposed COM-003-1 definition of "Thee-part Communication with what is used here:</p> <p>Three Part Communication: A communications protocol to be used when a Reliability Directive is initiated verbally, whereby the action to be taken is identified as a Reliability Directive; the recipient repeat the details of the Reliability Directive back to the issuer of the Reliability Directive; and the issuer acknowledges the</p>

Organization	Yes or No	Question 1 Comment
		<p>response from the recipient of the Reliability Directive as correct, or re-issues the Reliability Directive to resolve any misunderstanding.</p> <p>Response: The SDT has eliminated the definition of three-part communication and has incorporated the performance of three-part communication into the language of Requirements R2 and R3 in the second draft of COM-003. The new language incorporates much of your suggestion.</p>
<p>Response: The SDT thanks you for your comments. Please see our responses above.</p>		
Southern Company Transmission	Disagree	<p>Southern Company supports the SERC SOS comments.</p> <p>SERC SOS comments: We feel that the definition of Interoperability Communication is much too broad and is inconsistent with the effort to develop results-based standards. Adherence to such results-based standards would have a measurable and observable effect on the reliability of the bulk electric system. The definition of Interoperability Communication, as written, can include virtually any information exchange/instruction between entities, both routine and emergency. Such communication may or may not have a measurable and observable effect on bulk system reliability.</p> <p>The concern is that, since the broad term Interoperability Communication is used in every requirement in COM-003-1, entities will be required to use the English language, the central time zone, and 3-part communication in even the most routine exchanges of information. This could create a burden on operating personnel and a distraction from their reliability duties.</p> <p>Response: The SDT is eliminating the term Interoperability Communications because of comments citing ambiguity. We have revised the draft standard by defining the new term “Operating Communications.” With this new definition including all communications that change or maintain the state, status, output, or input of an Element or Facility of the Bulk Electric System, the SDT believes it has removed any ambiguity over the utilization of communication protocols between or among Functional Entities in the same or in other organizations.</p> <p>The SDT does not believe its work to be inconsistent with results-based principles. The Need or Problem Statement for this standard is that miscommunication can lead to action or inaction harmful to the reliability of BES. This was identified by the NERC President in his January 2011 report to the industry as one of the eight top priority issues for BPS reliability, and there are a number of events that have occurred in the past where miscommunication was a contributing factor to the event or exacerbated the severity of the event. The Goal, therefore, is to specify clear, formal and universally applied communication protocols</p>

Organization	Yes or No	Question 1 Comment
		<p>that reduce the possibility of miscommunication. The key Objective to accomplish this Goal is to use communication protocols to reduce or correct misunderstandings. The requirements have been written to accomplish this Objective, and are risk-mitigating requirements (while operator performance is measured, the actions themselves are primarily designed to mitigate the risk of miscommunication that could lead to poor BES performance). We believe this standard is consistent with results-based principles, and it will improve the reliability of the BES.</p> <p>This group does not feel the need for a definition of Interoperability Communication, since the term Reliability Directive has been defined in draft standard COM-002-3, which is currently posted for review. The Reliability Directive term is emergency-focused and consistent with the results-based standards process.</p> <p>Response: The SDT believes the term Reliability Directive as defined in COM 002-03 does not fully address the range of miscommunication risks that could seriously impact the reliability of the BES.</p> <p>The Need for this standard is that miscommunication can lead to action or inaction harmful to the reliability of BES, not just that miscommunications associated with emergencies can lead to action or inaction harmful to the reliability of BES. As such this standard is consistent with results-based principles. To the extent that entities feel actions or inactions caused by miscommunication have no ability to impact the reliability of the BES, then those entities simply disagree with the Need, but that does not indicate the standard is inconsistent with the results-based principles.</p> <p>In addition, the definition of Three-part Communication in this standard does not match the three-part communication requirements stated in COM-002-3. In COM-002-3, the requirements for three-part communication (state - repeat - acknowledge) apply to Reliability Directives, while in COM-003-1 the definition of Three-part Communication refers to “information” in general.</p> <p>Response: The SDT has eliminated the definition of three-part communication and has incorporated the performance of three-part communication into the language of Requirements R2 and R3 in the second draft of COM-003. The requirement now also applies only to “Operating Communications,” which includes all communications that change or maintain the state, status, output, or input of an Element or Facility of the Bulk Electric System</p>

Organization	Yes or No	Question 1 Comment
		<p>If, as stated in the Disposition of Requirements, the revisions to COM-002-3 will be moved to COM-003-1, the definition of Three-part Communication in this draft standard should be consistent with the requirements of COM-002-3.</p> <p>Response: The SDT agrees with this recommendation for consistency, however as envisioned, the requirements of COM-002-3 will be retired when the requirements of COM-003-1 become effective.</p> <p>Southern Company comments:</p> <p>Interoperability Communication - Communication between two or more entities to exchange reliability-related information regarding the Bulk Electric System. Why is a change in state or status required to make a communication between two entities an Interoperability Communication? What term should be used when a conference call is made to all of the RCs in an Interconnection to discuss low frequency?</p> <p>Response: The proposed term “Interoperability Communication” has been removed from the standard. Instead the SDT is proposing the new term “Operating Communications” to focus on the communications that change or maintain the state of the BES.</p> <p>Conference calls and discussions to determine actions and options would not constitute Operating Communications if they do not directly request a change to, or maintain, the state, status, output, or input of an Element or Facility of the Bulk Electric System.</p>
<p>Response: The SDT thanks you for your comments. Please see our responses above.</p>		
<p>Progress Energy Carolina, Inc</p>	<p>Disagree</p>	<p>The definition for Interoperability Communication needs more clarification/an interpretation since the type of communications is not defined, the term "reliability-related information" undefined, and it may be so diluting as to de-emphasize true reliability directives.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The proposed term “Interoperability Communication” has been removed from the standard. Instead the SDT is proposing the new term “Operating Communications” to focus on the communications that change or maintain the state of the BES.</p>		
<p>NYSEG</p>	<p>Disagree</p>	<p>The definition for Interoperability Communication needs to be further explained. The current definition would appear to include not only communication between two control centers, but also between a control center and field personnel for all normal and routine switching, which we do not believe is the intent of the</p>

Organization	Yes or No	Question 1 Comment
		<p>Standard.</p> <p>Response: The proposed term “Interoperability Communication” has been removed from the standard. Instead the SDT is proposing the new term “Operating Communications” to focus on the communications that change or maintain the state of the BES. That definition would also extend to communication between two control centers, and between a control center and field personnel for all normal and routine switching to the extent it meets the criteria of the Operating Communications definition. Miscommunication during routine operations can result in mistakes that could seriously impact reliability on the BES.</p> <p>Communication Protocol as a separate definition does not appear to be necessary. The provided definition describes the term in a simple and generic way and is not specific enough to provide anymore guidance than is already provided in a general understanding of the word “communication” or “protocol”.</p> <p>Response: The SDT agrees and has removed the term.</p> <p>Three-part communication should be revised as follows:</p> <p>An iterative process where verbal communication from a sender to receiver is repeated back to the sender by the receiver to eventually ensure correct and accurate transmission of the entire message.</p> <p>We believe this definition is more consistent with COM-002 R2, which is proposed to be retired once COM-003-1 is approved and Three-part Communication is adopted.</p> <p>Response: The SDT has eliminated the definition of three-part communication and has incorporated the performance of three-part communication into the language of Requirements R2 and R3 in the second draft of COM-003. The new language incorporates the intent of your recommendation.</p>
<p>Response: The SDT thanks you for your comments. Please see our responses above.</p>		
Ameren	Disagree	<p>The definition for three part implies the exact message must be repeated back. What should be said is the content must be repeated back in original or modified forms such that the originator is sure the recipient understands and can execute the action.</p> <p>Response: The SDT has eliminated the definition of three-part communication and has incorporated the performance of three-part communication into the language of Requirements R2 and R3 in the second</p>

Organization	Yes or No	Question 1 Comment
		<p>draft of COM-003. We have incorporated the language to not require a verbatim repeat-back.</p> <p>As far as Interoperability, what is state or status? Is the dispatch instruction to change from 500 MW to 505 MW such a communication? (which changed, state or status?)</p> <p>Response: The proposed term “Interoperability Communication” has been removed from the standard. Instead the SDT is proposing the new term “Operating Communications,” which includes all communications that change or maintain the state, status, output, or input of an Element or Facility of the Bulk Electric System.</p> <p>A dispatch instruction to change from 500 MW to 505 MW would be such a communication. The input or output on the system was changed in your example.</p>
<p>Response: The SDT thanks you for your comments. Please see our responses above.</p>		
<p>Entergy Services</p>	<p>Disagree</p>	<p>The definition for Three-part communication is deficient when compared with the requirements of the recently posted COM-002-3 which describes an iterative process in which the communicating party corrects the recipient in the situation where the repeated message contains inconsistencies. The party receiving the message will not always get the message right the first time.</p> <p>Response: The SDT has eliminated the definition of three-part communication and has incorporated the performance of three-part communication into the language of Requirements R2 and R3 in the second draft of COM-003. The new language incorporates the concept of iteration, and also includes the phrase, “not necessarily verbatim.”</p> <p>Also, Entergy does not believe that the introduction of the term Interoperability Communications is necessary. In the questions below, we identify specific ways that the requirements could be improved by including the term Reliability Directive as included in the recently posted COM-002-3. The term Interoperability Communications is very broad, covering both normal and emergency communications, creates a new category of communications without providing any real benefit to the industry.</p> <p>Response: The proposed term “Interoperability Communication” has been removed from the standard. Instead the SDT is proposing the new term “Operating Communications,” which includes all communications that change or maintain the state, status, output, or input of an Element or Facility of the</p>

Organization	Yes or No	Question 1 Comment
		<p>Bulk Electric System.</p> <p>The SDT believes the term Reliability Directives as defined in COM 002-03 does not fully address the range of miscommunication risks that could seriously impact the reliability of the BES.</p>
<p>Response: The SDT thanks you for your comments. Please see our responses above.</p>		
Transmission System Operations	Disagree	<p>The definition of “Interoperability Communication” is not clear. What does the term “reliability-related” information entail? Does “Interoperability Communication” include instructions from a control room to a generator to adjust vars, from the control room to field personnel to direct the changing of transformer taps, from the control room to field personnel to implement switching instructions, etc? What is the definition of “entity”? Does this mean if switching instructions are given from a control room of one company to personnel in its own company (i.e., the same entity), that the interaction would not be classified as “Interoperability Communication”?</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The proposed term “Interoperability Communication” has been removed from the standard. Instead the SDT is proposing the new term “Operating Communications,” which includes all communications that change or maintain the state, status, output, or input of an Element or Facility of the Bulk Electric System. Each of your examples, if they direct a change or maintain the state, status, output, or input of an Element or Facility of the Bulk Electric System, will be subject to the protocols in COM 003 including three part communication.</p>		
Florida Municipal Power Agency (FMPA) and some members	Disagree	<p>The definition of Communications Protocol can be improved as: Policies and procedures that govern how verbal and written communication is exchanged.</p> <p>Response: The SDT agreed with the numerous comments that the term was not useful and eliminated it from the Standard.</p> <p>The definition of Three-part Communication could be improved by simplifying the language as: A Communications Protocol where information is verbally stated by a party initiating a communication, the information is repeated back correctly by the party receiving the communication to the initiating party, and the same information is verbally confirmed to be correct by the initiating party.</p> <p>Response: The SDT has eliminated the definition of three-part communication and has incorporated the performance of three-part communication into the language of Requirements R2 and R3 in the second</p>

Organization	Yes or No	Question 1 Comment
		<p>draft of COM-003. The new language incorporates much of your suggestion.</p> <p>The definition of Interoperability Communication can be improved by using NERC Glossary of Terms definitions, e.g., Element and Facility ought to be capitalized in the definition, and the use of both Element and Facility is redundant and only the term Facility needs to be used since a Facility is essentially defined as a BES Element.</p> <p>Response: The proposed term “Interoperability Communication” has been removed from the standard. Instead the SDT is proposing the new term “Operating Communications,” which includes all communications that change or maintain the state, status, output, or input of an Element or Facility of the Bulk Electric System. The SDT has capitalized the terms “Element” and “Facility” as suggested, but elected to keep both terms in the definition. The NERC Glossary term Facility is not defined as a BES Element, but as “A set of electrical equipment that operates as a single Bulk Electric System Element.”</p>
<p>Response: The SDT thanks you for your comments. Please see our responses above.</p>		
Georgia Transmission Corp	Disagree	The definition of Interoperability Communication is very broad and has no real benefit.
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT eliminated the term “Interoperability Communications.” Instead, the SDT has revised the draft standard by defining the new term “Operating Communications.” With this new definition including all communications that change or maintain the state, status, output, or input of an Element or Facility of the Bulk Electric System, the SDT believes it has improved the standard to be clearer and less ambiguous.</p>		
Santee Cooper	Disagree	<p>The definition of Interoperability Communication needs to be clarified. What is the intent of the word “entities” in this definition? This definition may no longer be needed with the recent definition of a Reliability Directive.</p> <p>Three-part Communication should be required when issuing and receiving a Reliability Directive. This term has recently been defined by a SDT.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The proposed term “Interoperability Communication” has been removed from the standard. Instead the SDT is proposing the new term “Operating Communications,” which includes all communications that change or maintain the state, status, output, or input of an Element or</p>		

Organization	Yes or No	Question 1 Comment
<p>Facility of the Bulk Electric System.</p> <p>The SDT disagrees that Three-part Communication should be required only when issuing and receiving a Reliability Directive. The SDT believes the term Reliability Directives as defined in COM 002-03 does not fully address the range of miscommunication risks that could seriously impact the reliability of the BES.</p>		
<p>Kansas City Power & Light</p>	<p>Disagree</p>	<p>The definition of Three-part Communication applies only when the communication is understood by the listener the first time. Because the definition requires the listener to repeat the information back correctly, failure of the listener to understand the information the first time could be construed as a violation or at least not fitting the definition. The definition should rather reflect that three-part communication is an iterative process that should be followed until the listener is confirmed by the speaker to get the information correct.</p> <p>We suggest the definition be revised as follows: "A Communications Protocol where information is verbally stated by a party initiating a communication, the information is repeated back correctly to the party that initiated the communication by the second party that received the communication, and the same information is verbally confirmed to be correct or corrected by the party who initiated the communication. The protocol should be followed until the party issuing the information is satisfied that a party receiving the information has understood the communication and confirmed it."</p> <p>Response: The SDT has eliminated the definition of three-part communication and has incorporated the performance of three-part communication into the language of Requirements R2 and R3 in the second draft of COM-003.</p> <p>The definition for Interoperability Communication is too broad. Currently, this could mean any communication of information. This should be confined to emergency or unusual operating conditions.</p> <p>Response: The SDT disagrees that three-part communication should be confined to emergency or unusual operating conditions; miscommunication occurs during routine operations that could seriously impact the reliability of the BES. The proposed term "Interoperability Communication" has been removed from the standard and replaced with the new term "Operating Communications." This term includes all communications that change or maintain the state, status, output, or input of an Element or Facility of the Bulk Electric System. As such, this limits the scope of the requirements so that not all communications of information are included under the standard.</p>

Organization	Yes or No	Question 1 Comment
<p>Response: The SDT thanks you for your comments. Please see our responses above.</p>		
<p>Midwest ISO Standards Collaborators</p>	<p>Disagree</p>	<p>The definition of Three-part Communication applies only when the communication is understood by the listener the first time. Because the definition requires the listener to repeat the information back correctly, failure of the listener to understand the information the first time could be construed as a violation or at least not fitting the definition. The definition should rather reflect that three-part communication is an iterative process that should be followed until the listener is confirmed by the speaker to get the information correct.</p> <p>We suggest the definition be revised as follows:”</p> <p>A Communications Protocol where information is verbally stated by a party initiating a communication, the information is repeated back correctly to the party that initiated the communication by the second party that received the communication, and the same information is verbally confirmed to be correct or corrected by the party who initiated the communication. The protocol should be followed until the party issuing the information is satisfied that a party receiving the information has understood the communication and confirmed it.”</p> <p>Response: The SDT has eliminated the definition of three-part communication and has incorporated the performance of three-part communication into the language of Requirements R2 and R3 in the second draft of COM-003. The SDT has also added language to specify responses are not necessarily required to be verbatim.</p> <p>These principles are included in Requirements R2 and R3 in the recently issued draft Standard COM-002-3 in Project 2006-06. We believe the term “Interoperability Communication” creates confusion within the industry and contradicts the work by RTO and RC SDT in Project 2006-06 that limits the requirement to use three-part communications when issuing Reliability Directives (defined in Project 2006-06) that address anticipated and actual emergency conditions.</p> <p>Response: The current draft version of COM-003-1 does not use the terms “directive” or “Reliability Directive,” instead using the new term “Operating Communications.” The SDT is working to coordinate with Project 2006-06 to eliminate any potential conflicts between the standards.</p> <p>The OPCP SDT disagrees with the concept of only requiring three part communication solely in emergency conditions. Mistakes due to poor communication can also occur during routine operations. Blackout</p>

Organization	Yes or No	Question 1 Comment
		<p>Report Recommendation #26 states communication protocols should be tightened, “especially” those for alerts and emergency communications, but does not recommend they be tightened only for alert and emergency conditions. FERC Order 693 P531 directed communication protocols be tightened, and suggested a new COM Reliability Standard as an acceptable approach. The SAR for this SDT charged the team to “tighten communication protocols, especially for communications during alerts and emergencies,” but did not rule out improving all communications as a way of meeting the objective of the SAR. Additionally the SAR required “the use of specific communication protocols, enabling information to be efficiently conveyed and mutually understood for all operating conditions.”</p> <p>Additionally, it appears that this definition would encompass all verbal communications and, as such, we question the need for such definition. While using three-part communications during routine operations may be a best operating practice, we do not believe that it is so critical to reliability that it becomes an enforceable requirement for routine operating instructions. Rather we believe the enforceable requirement should be limited to require three-part communications during actual emergency and anticipated emergency conditions only.</p> <p>Response: The SDT disagrees that three-part communication should be confined to emergency or unusual operating conditions; miscommunication can occur during routine operations that could seriously impact the reliability of the BES.</p> <p>Both element and facility are used in the Interoperability Communication definition and are NERC defined terms. Did the drafting team intend that the NERC definitions should apply? Then the terms need to be capitalized.</p> <p>Response: The SDT did not retain the term, “Interoperability Communication” in the second draft of the standard. However, where the SDT proposed a new term, “Operating Communication” that uses the terms, “Element” and “Facility” and the SDT has capitalized these words where used so in the new term.</p> <p>In addition, the term “entities” is confusing and needs to be defined.</p> <p>The SDT believes the word entity is well understood in the industry – however the term, “Interoperability Communication” is not used in the second draft of the standard</p>

Organization	Yes or No	Question 1 Comment
<p>Response: The SDT thanks you for your comments. Please see our responses above.</p>		
PSEG Companies	Disagree	<p>The PSEG Companies agree with the concerns expressed in the comments filed by the PJM System Operations Subcommittee (SOS) Group.</p>
<p>Response: The SDT thanks you for your comments. Please see our response to the comments filed by the PJM System Operations Subcommittee (SOS) Group.</p>		
ERCOT ISO	Disagree	<p>The purpose of the standard is for timely communication of reliability-related information “especially during alerts and emergencies”. The definition and use of Interoperability Communication in this standard expands the intended scope of the standard beyond alerts and emergencies.</p> <p>The OPCP SDT disagrees with the concept of requiring three part communication solely in emergency conditions. Mistakes due to poor communication can also occur during routine operations. Blackout Report Recommendation #26 states communication protocols should be tightened, “especially” those for alerts and emergency communications, but does not recommend they be tightened only for alert and emergency conditions. FERC Order 693 P531 directed communication protocols be tightened, and suggested a new COM Reliability Standard as an acceptable approach. The SAR for this SDT charged the team to “tighten communication protocols, especially for communications during alerts and emergencies,” but did not rule out improving all communications as a way of meeting the objective of the SAR. Additionally the SAR required “the use of specific communication protocols, enabling information to be efficiently conveyed and mutually understood for all operating conditions.”</p> <p>Guidance should be provided for verbal communications with respect to hot-line calls (one party too many) and how three-part communication should be handled. This definition assumes a one on one communication.</p> <p>Response: The SDT clarified, in the second draft of the standard, that the use of three-part communication is limited to instances involving oral, person-to-person communication.</p>
<p>Response: The SDT thanks you for your comments. Please see our responses above.</p>		
Northeast Utilities	Disagree	<p>The term “Interoperability Communication” creates confusion within the industry and contradicts the work by RTO and RC SDT in Project 2006-06 that limits the requirement to use three-part communications when</p>

Organization	Yes or No	Question 1 Comment
		<p>issuing Reliability Directives (defined in Project 2006-06) that address anticipated and actual emergency conditions. Additionally, it appears that this definition would encompass all verbal communications and, as such, we question the need for such definition.</p> <p>The definition of “three-part communication” may be viewed as accurate and consistent with the work that has been done and substantially progressed through two other SDTs, we believe the RC SDT requirement, which includes “and shall acknowledge the response as correct or repeat the original statement to resolve any misunderstandings”, is more complete.</p> <p>Response: The SDT has eliminated the definition of three-part communication and has incorporated the performance of three-part communication into the language of Requirements R2 and R3 in the second draft of COM-003. We are following the progress of Project 2006-06 (RCSDT) to work toward consistency.</p> <p>Again, we believe the term “Interoperability Communication” contradicts this work and creates confusion within the industry. It appears to mandate 3-part communication during operational strategic discussions, as well as other “non-action” oriented communications. We believe this Requirement would, in fact, be adverse to reliability instead of enhancing reliability by reducing the amount of pre-action communications that may occur prior to taking action because operators may be more concerned with not repeating back during such pre-action, strategic calls and/or discussion.</p> <p>Response: The proposed term “Interoperability Communication” has been removed from the revised standard. Instead the SDT is proposing the new term “Operating Communications,” which includes all communications that change or maintain the state, status, output, or input of an Element or Facility of the Bulk Electric System. With this change, the SDT does not believe the standard can be construed as requiring repeating back during such conversations on pre-action, strategic calls and/or discussions.</p>
<p>Response: The SDT thanks you for your comments. Please see our responses above</p>		
<p>Tri-State Generation & Transmission Assoc.</p>	<p>Disagree</p>	<p>The term directive is not defined therefore it is unclear what constitutes a directive.</p>
<p>Response: The SDT thanks you for your comments. The second draft version of COM-003-1 does not use the terms “directive” or “Reliability Directive,” instead using the new term “Operating Communications.”</p>		

Organization	Yes or No	Question 1 Comment
Dynergy	Disagree	<p>The way the definition of “Three-part Communication” is worded applies only when the communication is understood by the listener the first time. Because the definition requires the listener to repeat the information back correctly, failure of the listener to understand the information the first time could be construed as a violation or at least not fitting the definition. The definition should rather reflect that three-part communication is an iterative process that should be followed until the listener is confirmed by the speaker to get the information correct.</p> <p>We suggest the definition be revised as follows:</p> <p>”A Communications Protocol where information is verbally stated by a party initiating a communication, the information is repeated back correctly to the party that initiated the communication by the second party that received the communication, and the same information is verbally confirmed to be correct or corrected by the party who initiated the communication. The protocol should be followed until the party issuing the information is satisfied that a party receiving the information has understood the communication and confirmed it.”</p> <p>Response: The SDT has eliminated the definition of three-part communication and has incorporated the performance of three-part communication into the language of Requirements R2 and R3 in the second draft of COM-003. The new language incorporates much of your suggestion. The SDT has also added language to applicable requirements to specify repeat-backs are not required to be verbatim.</p> <p>It should also be noted that these principles are included in Requirements R2 and R3 in the recently issued draft Standard COM-002-3 in Project 2006-06. This definition in this Standard is not needed.</p> <p>We believe the term “Interoperability Communication” creates confusion within the industry and contradicts the work by RTO and RC SDT in Project 2006-06 that limits the requirement to use three-part communications when issuing Reliability Directives (defined in Project 2006-06) that address anticipated and actual emergency conditions. Additionally, it appears that this definition would encompass all verbal communications and, as such, would be a distraction to Operators. Therefore, there is no reliability need for this definition.</p> <p>Response: The proposed term “Interoperability Communication” has been removed from the standard. Instead the SDT is proposing the new term “Operating Communications,” which includes all communications that change or maintain the state, status, output, or input of an Element or Facility of the</p>

Organization	Yes or No	Question 1 Comment
		<p>Bulk Electric System. We are following the progress of Project 2006-06 (RCSDT) to work toward consistency.</p> <p>While using three-part communications during routine operations may be a best operating practice, we do not believe that it is so critical to reliability that it needs to become an enforceable requirement for routine operating instructions. Rather we believe the enforceable requirement should be limited to require three-part communications during actual emergency and anticipated emergency conditions only.</p> <p>The OPCP SDT disagrees with the concept of only requiring three part communication solely in emergency conditions. Mistakes due to poor communication can also occur during routine operations. Blackout Report Recommendation #26 states communication protocols should be tightened, “especially” those for alerts and emergency communications, but does not recommend they be tightened only for alert and emergency conditions. FERC Order 693 P531 directed communication protocols be tightened, and suggested a new COM Reliability Standard as an acceptable approach. The SAR for this SDT charged the team to “tighten communication protocols, especially for communications during alerts and emergencies,” but did not rule out improving all communications as a way of meeting the objective of the SAR. Additionally the SAR required “the use of specific communication protocols, enabling information to be efficiently conveyed and mutually understood for all operating conditions.”</p> <p>Both element and facility are used in the Interoperability Communication definition and are NERC defined terms. Did the drafting team intend that the NERC definitions should apply? Then the terms need to be capitalized.</p> <p>Response: The SDT did not retain the term, “Interoperability Communication” in the second draft of the standard. However, where the SDT proposed a new term, “Operating Communication” that uses the terms, “Element” and “Facility” and the SDT has capitalized these words where used so in the new term.</p> <p>In addition, the term “entities” is confusing and needs to be defined.</p> <p>Response: The SDT believes the word entity is well understood in the industry – however the term, “Interoperability Communication” is not used in the second draft of the standard.</p>
<p>Response: The SDT thanks you for your comments. Please see our responses above.</p>		
<p>Hydro-Quebec TransEnergie</p>	<p>Disagree</p>	<p>The way the definition of “Three-part Communication” is worded applies only when the communication is understood by the listener the first time. The RC SDT requirement which includes “and shall acknowledge the</p>

Organization	Yes or No	Question 1 Comment
		<p>response as correct or repeat the original statement to resolve any misunderstandings” is more complete. Because the definition requires the listener to repeat the information back correctly, failure of the listener to understand the information the first time could be construed as a violation or at least not fitting the definition. The definition should reflect that three-part communication is an iterative process that should be followed until the listener is confirmed by the speaker to get the information correct.</p> <p>A suggested revision to the definition:</p> <p>A Real-Time Communications Protocol where information is verbally stated by a party initiating a communication, the information is repeated back to the party that initiated the communication by the second party that received the communication, and the information is verbally confirmed to be correct or corrected by the party who initiated the communication. The protocol should be followed until the party issuing the information is satisfied that a party receiving the information has understood the communication and confirmed it.</p> <p>These principles are included in Requirements R2 and R3 in the recently issued draft Standard COM-002-3 in Project 2006-06.</p> <p>An alternative suggestion to the definition of Three-part Communication: A Real-Time Operating Communications Protocol where information is verbally stated by a party initiating a communication, the information is repeated back correctly to the party that initiated the communication by the second party that received the communication, and the information is verbally confirmed to be correct by the party who initiated the communication.</p> <p>Response: The SDT has eliminated the definition of three-part communication and has incorporated the performance of three-part communication into the language of Requirements R2 and R3 in the second draft of COM-003. The new language incorporates much of your suggestion. The SDT has also added language to applicable requirements to specify repeat-backs are not required to be verbatim.</p> <p>In the definition of Communications Protocol, the term “Interoperability Communication” creates confusion within the industry, and contradicts the work by RTO and RC SDT in Project 2006-06 that limits the requirement to use three-part communications when issuing Reliability Directives (defined in Project 2006-06) that address anticipated and actual emergency conditions, and do not agree with its definition. What also must be considered is that the RC SDT has stated that when someone “says”, it is a directive--operating conditions are not distinguished. This definition unnecessarily and counterproductively encompasses all</p>

Organization	Yes or No	Question 1 Comment
		<p>verbal communications and, as such, is not needed. It is not so critical to reliability that it should become an enforceable requirement for routine operating instructions.</p> <p>Response: The proposed term “Interoperability Communication” has been removed from the standard. Instead the SDT is proposing the new term “Operating Communications,” which includes all communications that change or maintain the state, status, output, or input of an Element or Facility of the Bulk Electric System.</p> <p>The OPCP SDT disagrees with the concept of only requiring three part communication solely in emergency conditions. Mistakes due to poor communication can also occur during routine operations. Blackout Report Recommendation #26 states communication protocols should be tightened, “especially” those for alerts and emergency communications, but does not recommend they be tightened only for alert and emergency conditions. FERC Order 693 P531 directed communication protocols be tightened, and suggested a new COM Reliability Standard as an acceptable approach. The SAR for this SDT charged the team to “tighten communication protocols, especially for communications during alerts and emergencies,” but did not rule out improving all communications as a way of meeting the objective of the SAR. Additionally the SAR required “the use of specific communication protocols, enabling information to be efficiently conveyed and mutually understood for all operating conditions.”</p> <p>The enforceable requirement should be limited to require three-part communications, and be left to the entity that needs the action to be taken to establish the need for three-part communications by stating in the communication that they are issuing a directive. This would be a clear trigger, and be auditable and measurable. Virtually all communications in a control room environment deal with changing the state or status of an element of facility, as such there is not a need to define this communication protocol.</p> <p>Response: The SDT believes it is just as clear a trigger to use three part communication based on the criteria that three-part communication must be used for any communication that intends to change or maintain the state, status, output, or input of an Element or Facility of the Bulk Electric System.</p> <p>Both element and facility are used in the Interoperability Communication definition and are NERC defined terms. Did the drafting team intend that the NERC definitions should apply? Then the terms need to be capitalized.</p>

Organization	Yes or No	Question 1 Comment
		<p>Response: The SDT did not retain the term, “Interoperability Communication” in the second draft of the standard. However, where the SDT proposed a new term, “Operating Communication” that uses the terms, “Element” and “Facility” and the SDT has capitalized these words where used so in the new term.</p> <p>In addition, the term “entities” is confusing and needs to be defined.</p> <p>Response: The SDT believes the word entity is well understood in the industry – however the term, “Interoperability Communication” is not used in the second draft of the standard.</p>
<p>Response: The SDT thanks you for your comments. Please see our responses above</p>		
<p>Northeast Power Coordinating Council</p>	<p>Disagree</p>	<p>The way the definition of “Three-part Communication” is worded applies only when the communication is understood by the listener the first time. The RC SDT requirement which includes “and shall acknowledge the response as correct or repeat the original statement to resolve any misunderstandings” is more complete. Because the definition requires the listener to repeat the information back correctly, failure of the listener to understand the information the first time could be construed as a violation or at least not fitting the definition. The definition should reflect that three-part communication is an iterative process that should be followed until the listener is confirmed by the speaker to get the information correct.</p> <p>A suggested revision to the definition:</p> <p>A Real-Time Communications Protocol where information is verbally stated by a party initiating a communication, the information is repeated back correctly to the party that initiated the communication by the second party that received the communication, and the same information is verbally confirmed to be correct or corrected by the party who initiated the communication. The protocol should be followed until the party issuing the information is satisfied that a party receiving the information has understood the communication and confirmed it.</p> <p>These principles are included in Requirements R2 and R3 in the recently issued draft Standard COM-002-3 in Project 2006-06.</p> <p>An alternative suggestion to the definition of Three-part Communication:</p> <p>A Real-Time Operating Communications Protocol where information is verbally stated by a party initiating a communication, the information is repeated back correctly to the party that initiated the communication by</p>

Organization	Yes or No	Question 1 Comment
		<p>the second party that received the communication, and the same information is verbally confirmed to be correct by the party who initiated the communication.</p> <p>Response: The SDT has eliminated the definition of three-part communication and has incorporated the performance of three-part communication into the language of Requirements R2 and R3 in the second draft of COM-003. The new language incorporates much of your suggestion. The SDT has also added language to applicable requirements to specify repeat-backs are not required to be verbatim.</p> <p>A suggestion to the definition of Communications Protocol: The SDT could not locate the content here.</p> <p>The term “Interoperability Communication” creates confusion within the industry, and contradicts the work by RTO and RC SDT in Project 2006-06 that limits the requirement to use three-part communications when issuing Reliability Directives (defined in Project 2006-06) that address anticipated and actual emergency conditions, and do not agree with its definition. What also must be considered is that the RC SDT has stated that when someone “says”, it is a directive--operating conditions are not distinguished. This definition unnecessarily and counterproductively encompasses all verbal communications and, as such, is not needed. It is not so critical to reliability that it should become an enforceable requirement for routine operating instructions.</p> <p>Response: The proposed term “Interoperability Communication” has been removed from the standard. Instead the SDT is proposing the new term “Operating Communications,” which includes all communications that change or maintain the state, status, output, or input of an Element or Facility of the Bulk Electric System.</p> <p>The OPCP SDT disagrees with the concept of only requiring three part communication solely in emergency conditions. Mistakes due to poor communication can also occur during routine operations. Recommendation #26 states communication protocols should be tightened, “especially” those for alerts and emergency communications, but does not recommend they be tightened only for alert and emergency conditions. FERC Order 693 P531 directed communication protocols be tightened, and suggested a new COM Reliability Standard as an acceptable approach. The SAR for this SDT charged the team to “tighten communication protocols, especially for communications during alerts and emergencies,” but did not rule out improving all communications as a way of meeting the objective of the SAR. Additionally the SAR</p>

Organization	Yes or No	Question 1 Comment
		<p>required “the use of specific communication protocols, enabling information to be efficiently conveyed and mutually understood for all operating conditions.”</p> <p>The enforceable requirement should be limited to require three-part communications, and be left to the entity that needs the action to be taken to establish the need for three-part communications by stating in the communication that they are issuing a directive. This would be a clear trigger, and be auditable and measurable. Virtually all communications in a control room environment deal with changing the state or status of an element of facility, as such there is not a need to define this communication protocol.</p> <p>Response: The SDT believes it is just as clear a trigger to use three part communication based on the criteria that three-part communication must be used for any communication that intends to change or maintain the state, status, output, or input of an Element or Facility of the Bulk Electric System.</p> <p>Both element and facility are used in the Interoperability Communication definition and are NERC defined terms. Did the drafting team intend that the NERC definitions should apply? If so, the terms need to be capitalized.</p> <p>Response: The SDT did not retain the term, “Interoperability Communication” in the second draft of the standard. However, where the SDT proposed a new term, “Operating Communication” that uses the terms, “Element” and “Facility” and the SDT has capitalized these words where used so in the new term.</p> <p>The term “entities” is confusing and needs to be defined.</p> <p>Response: The SDT believes the word entity is well understood in the industry – however the term, “Interoperability Communication” is not used in the second draft of the standard.</p>
<p>Response: The SDT thanks you for your comments. Please see our responses above</p>		
<p>IRC Standards Review Committee</p>	<p>Disagree</p>	<p>The way the definition of Three-part Communication is worded applies only when the communication is understood by the listener the first time. Because the definition requires the listener to repeat the information back correctly, failure of the listener to understand the information the first time could be construed as a violation or at least not fitting the definition. The definition should rather reflect that three-part communication is an iterative process that should be followed until the listener is confirmed by the</p>

Organization	Yes or No	Question 1 Comment
		<p>speaker to get the information correct.</p> <p>We suggest the definition be revised as follows:</p> <p>A Communications Protocol where information is verbally stated by a party initiating a communication, the information is repeated back correctly to the party that initiated the communication by the second party that received the communication, and the same information is verbally confirmed to be correct or corrected by the party who initiated the communication. The protocol should be followed until the party issuing the information is satisfied that a party receiving the information has understood the communication and confirmed it.</p> <p>Response: The SDT has eliminated the definition of three-part communication and has incorporated the performance of three-part communication into the language of Requirements R2 and R3 in the second draft of COM-003. The new language incorporates much of your suggestion. The SDT has also added language to specify repeat-backs are not required to be verbatim.</p> <p>We believe the term “Interoperability Communication” contradicts the work by the RTO and RC SDT that limits the requirement to use three-part communications to only those communications that explicitly state that the communication is a Reliability Directive and creates confusion within the industry. Additionally, it appears that this definition would encompass all verbal communications and, as such, we question the need for such definition. While we support using three-part communications during routine operations as a best operating practice, we do not believe that it is so critical to reliability that it becomes an enforceable requirement for routine operating instructions. Rather we believe the enforceable requirement should be left to the entity that needs the action to be taken to establish the need for three-part communications by stating in the communication that they are issuing a directive. This would be a clear trigger and auditable and measureable.</p> <p>Response: The proposed term “Interoperability Communication” has been removed from the standard. Instead the SDT is proposing the new term “Operating Communications,” which includes all communications that change or maintain the state, status, output, or input of an Element or Facility of the Bulk Electric System. The SDT believes this provides just as clear a trigger.</p> <p>Both element and facility are used in the Interoperability Communication definition and are NERC defined terms. Did the drafting team intend that the NERC definitions should apply? Then the terms need to be</p>

Organization	Yes or No	Question 1 Comment
		<p>capitalized.</p> <p>Response: The SDT agrees and has done so within the new term, “Operating Communications”.</p>
<p>Response: The SDT thanks you for your comments. Please see our responses above.</p>		
<p>ISO New England Inc.</p>	<p>Disagree</p>	<p>The way the definition of Three-part Communication is worded applies only when the communication is understood by the listener the first time. Because the definition requires the listener to repeat the information back correctly, failure of the listener to understand the information the first time could be construed as a violation. The definition should rather reflect that three-part communication is an iterative process that should be followed until the listener is confirmed by the speaker to get the information correct. We suggest the definition be revised as follows:</p> <p>A Communications Protocol where information is verbally stated by a party initiating a communication, the information is repeated back to the party that initiated the communication by a second party that received the communication, and the information is verbally confirmed to be correct or corrected by the party who initiated the communication. The protocol should be followed until the party issuing the information is satisfied that a party receiving the information has understood the communication and confirmed it.</p> <p>Response: The SDT has eliminated the definition of three-part communication and has incorporated the performance of three-part communication into the language of Requirements R2 and R3 in the second draft of COM-003. The new language incorporates much of your suggestion. The SDT has also added language to applicable requirements to specify repeat-backs are not required to be verbatim.</p> <p>We believe the term “Interoperability Communication” contradicts the work by the RTO and RC SDT that limits the requirement to use three-part communications to only those communications that explicitly state that the communication is a Reliability Directive and creates confusion within the industry. Additionally, it appears that this definition would encompass all verbal communications and, as such, we question the need for such definition. While we support using three-part communications during routine operations as a best operating practice, we do not believe that it is so critical to reliability that it becomes an enforceable requirement for routine operating instructions. Rather we believe the enforceable requirement should be left to the entity that needs the action to be taken to establish the need for three-part communications by stating in the communication that they are issuing a directive. This would be a clear trigger and auditable</p>

Organization	Yes or No	Question 1 Comment
		<p>and measurable.</p> <p>Response: The proposed term “Interoperability Communication” has been removed from the standard. Instead the SDT is proposing the new term “Operating Communications,” which includes all communications that change or maintain the state, status, output, or input of an Element or Facility of the Bulk Electric System. The SDT believes this provides just as clear a trigger.</p>
<p>The way the definition of Three-part Communication is worded seems to only apply when the communication is understood by the listener the first time. Because the definition requires the listener to repeat the information back correctly, failure of the listener to understand the information the first time could be construed as a violation. The definition should, rather, reflect that three-part communication is an iterative process that should be followed until the listener is confirmed by the speaker to get the information correct. We suggest the definition be revised as follows:</p> <p>A Communications Protocol where information is verbally stated by a party initiating a communication, the information is repeated back to the party that initiated the communication by a second party that received the communication, and the information is verbally confirmed to be correct or corrected by the party who initiated the communication. The protocol should be followed until the party issuing the information is satisfied that a party receiving the information has understood the communication and confirmed it.</p> <p>Response: The SDT has eliminated the definition of three-part communication and has incorporated the performance of three-part communication into the language of Requirements R2 and R3 in the second draft of COM-003. The new language incorporates much of your suggestion. The SDT has also added language to applicable requirements to specify repeat-backs are not required to be verbatim.</p>		
FirstEnergy	Disagree	<p>Three-part Communication The phrase "the information is repeated back correctly" may pose compliance problems if the second party does not repeat the information back correctly the first time.</p> <p>We suggest the definition be revised as follows:</p> <p>"A Communications Protocol where information is verbally stated by one person to a second person whereby communication is initiated, the second person repeats the information back to the first person as means to verify the communication. The initiating party either confirms the response as correct or repeats the original statement and resolves any misunderstandings.</p> <p>Response: The SDT has eliminated the definition of three-part communication and has incorporated the performance of three-part communication into the language of Requirements R2 and R3 in the second draft of COM-003. The new language incorporates much of your suggestion. The SDT has also added language to specify repeat-backs are not required to be verbatim.</p>

Organization	Yes or No	Question 1 Comment
		<p>"Interoperability Communication</p> <p>We recommend this definition be removed and be incorporated into the RCSDT's proposed definition of Reliability Directive. Please see our comments in Question 6 for a complete explanation.</p> <p>Response: The proposed term “Interoperability Communication” has been removed from the standard. Instead the SDT is proposing the new term “Operating Communications,” which includes all communications that change or maintain the state, status, output, or input of an Element or Facility of the Bulk Electric System.</p> <p>Please see response to comments in Question 6 as well.</p>
<p>Response: The SDT thanks you for your comments. Please see our responses above</p>		
PPL	Disagree	<p>Three-part Communication is too prescriptive. How will “all call/blast” communications be handled? Also, it is unclear what communications are included in Interoperability Communication.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT has eliminated the definition of three-part communication and has incorporated it into the language of Requirements R2 and R3 in the new draft. The language has been modified to be more flexible and support different scenarios. The SDT considered adding a requirement to address “all call” or “blast” communications but determined that a requirement is not necessary. As revised, the need to perform a “repeat back” of an Operating Communication is limited to oral person-to-person communications.</p>		
California Independent System Operator	Disagree	<p>Three-Part Communications:</p> <p>There is no leeway given if the “intent” of the information is repeated back correctly. If the initiating party mispronounces a word and the receiver does not, is it a violation?</p> <p>Also there is a possibility of delaying actions due to multiple repeat backs while attempting to repeat back verbatim. The air traffic control /pilot communications could be held up as the current best practice standard in critical communications, and utilizing three-part techniques... and they do NOT use verbatim word-for-word repeat. Rather the messages are often truncated, but still indicate an understanding of the message.</p> <p>Response: The SDT has eliminated the definition of three-part communication and has incorporated the performance of three-part communication into the language of Requirements R2 and R3 in the second draft</p>

Organization	Yes or No	Question 1 Comment
		<p>of COM-003. The SDT has also added language to applicable requirements to specify repeat-backs are not required to be verbatim.</p> <p>Interoperability Communication: The proposed definition does not distinguish between internal and external entities. A more specific term than entity is needed here for clarity. With no more guidance than provided, a Generation Dispatcher may be considered a separate entity than the Transmission Dispatcher in the same room. As proposed the definition opens the doors for wildly different interpretations. We think this term, in this usage, applies to communication between companies, but we are not sure.</p> <p>Response: We agree with your comments. The SDT is eliminating the term “Interoperability Communications” because of comments citing ambiguity. We have revised the draft standard by defining the new term “Operating Communications.” With this new definition including all communications that change or maintain the state, status, output, or input of an Element or Facility of the Bulk Electric System, the SDT believes it has removed any ambiguity over the utilization of communication protocols between or among Functional Entities in the same or in other organizations.</p> <p>Interoperability Communication is a bit of an unconventional use of the word interoperability. The standard strives to ensure communication protocols ensure interoperability. Communication Interoperability normally in usage, refers to the ability of dissimilar systems to exchange data. Its use here is unnecessarily confusing. It’s a rather messy way of saying, inter-company communication.</p> <p>Response: The proposed term “Interoperability Communication” has been removed from the standard. Instead the SDT is proposing the new term “Operating Communications,” which includes all communications that change or maintain the state, status, output, or input of an Element or Facility of the Bulk Electric System.</p>
<p>Response: The SDT thanks you for your comments. Please see our responses above.</p>		
Electric Market Policy	Disagree	<p>We do not agree with the adaptation of the proposed term “Interoperability Communication”. As defined, it is limited to the communication of information to be used to change the state or status of a BES element or facility. That definition is too limiting in that there are many types of reliability-related information that need</p>

Organization	Yes or No	Question 1 Comment
		<p>to be clearly communicated that do not lead to changing the state of a BES facility. For example; information related to ratings, information related to the results of studies, information related to data errors or loss of data, etc.</p> <p>If the term “Interoperability Communication” is to be retained, we strongly suggest a name change. The word “interoperability” is widely used to refer to the ability of a system to work with or use the parts or equipment of another system. For example please see the current standards development efforts identified in the NIST Framework and Roadmap for Smart Grid Interoperability Standards available at: http://www.nist.gov/public_affairs/releases/smartgrid_interoperability.pdf. Using the term “interoperability” to refer to reliability-related human communications could be confusing to regulators, compliance personnel, auditors, and many others who have to deal with a variety of standards.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>Response: The proposed term “Interoperability Communication” has been removed from the standard. Instead the SDT is proposing the new term “Operating Communications,” which includes all communications that change or maintain the state, status, output, or input of an Element or Facility of the Bulk Electric System.</p>		
PJM	Disagree	<p>We feel that the definition of Interoperability Communication is much too broad and is inconsistent with the effort to develop results-based standards which would have a measurable and observable effect on the reliability of the bulk electric system. The definition of Interoperability Communication, as written, can include virtually any information exchange/instruction between entities, both routine and emergency. Such communication may or may not have a measurable and observable effect on bulk system reliability. Since the broad term Interoperability Communication is used in every requirement in COM-003-1, entities will be required to use the English language, the central time zone, and 3-part communication in even the most routine exchanges of information. This could create a burden on operating personnel and a distraction from their reliability duties. This group does not feel the need for a definition of Interoperability Communication, since the term Reliability Directive has been defined in draft standard COM-002-3, which is currently posted for review. The Reliability Directive term is emergency-focused and consistent with the results-based standards process</p> <p>Response: Response: The proposed term “Interoperability Communication” has been removed from the standard. Instead the SDT is proposing the new term “Operating Communications,” which includes all communications that change or maintain the state, status, output, or input of an Element or Facility of the</p>

Organization	Yes or No	Question 1 Comment
		<p>Bulk Electric System. Routine operations that would affect the BES as described would be subject to the use of the communication protocols in COM 003. The SDT believes the term Reliability Directives as defined in COM 002-03 does not fully address the range of miscommunication risks that could seriously impact the reliability of the BES.</p> <p>The SDT does not believe its work to be inconsistent with results-based principles. The Need or Problem Statement for this standard is that miscommunication can lead to action or inaction harmful to the reliability of BES. This was identified by the NERC President in his January 2011 report to the industry as one of the eight top priority issues for BPS reliability, and there are a number of events that have occurred in the past where miscommunication was a contributing factor to the event or exacerbated the severity of the event. The Goal, therefore, is to specify clear, formal and universally applied communication protocols that reduce the possibility of miscommunication. The key Objective to accomplish this Goal is to use communication protocols to reduce or correct misunderstandings. The requirements have been written to accomplish this Objective, and are risk-mitigating requirements (while operator performance is measured, the actions themselves are primarily designed to mitigate the risk of miscommunication that could lead to poor BES performance). We believe this standard is consistent with results-based principles, and it will improve the reliability of the BES.</p> <p>In addition, the definition of Three-part Communication in this standard does not match the three-part communication requirements stated in COM-002-3. In COM-002-3, the requirements for three-part communication (state - repeat - acknowledge) apply to Reliability Directives, while in COM-003-1 the definition of Three-part Communication refers to “information” in general. If, as stated in the Disposition of Requirements, the revisions to COM-002-3 will be moved to COM-003-1, the definition of Three-part Communication in this draft standard should be consistent with the requirements of COM-002-3. The way the definition of Three-part Communication is worded applies only when the communication is understood by the listener the first time. Because the definition requires the listener to repeat the information back correctly, failure of the listener to understand the information the first time could be construed as a violation or at least not fitting the definition. The definition should rather reflect that three-part communication is an iterative process that should be followed until the listener is confirmed by the speaker to get the information correct.</p> <p>We suggest the definition be revised as follows:</p>

Organization	Yes or No	Question 1 Comment
		<p>"A Communications Protocol where information is verbally stated by a party initiating a communication, the information is repeated back correctly to the party that initiated the communication by the second party that received the communication, and the same information is verbally confirmed to be correct or corrected by the party who initiated the communication. The protocol should be followed until the party issuing the information is satisfied that a party receiving the information has understood the communication and confirmed it.</p> <p>Response: The SDT has eliminated the definition of three-part communication and has incorporated the performance of three-part communication into the language of Requirements R2 and R3 in the second draft of COM-003. The SDT has also added language to applicable requirements to specify repeat-backs are not required to be verbatim.</p> <p>Both element and facility are used in the Interoperability Communication definition and are NERC defined terms. Did the drafting team intend that the NERC definitions should apply? Then the terms need to be capitalized.</p> <p>Response: The SDT agrees and has done so within the new term, "Operating Communications".</p>
<p>Response: The SDT thanks you for your comments. Please see our responses above</p>		
PJM SOS Comments	Disagree	<p>We feel that the definition of Interoperability Communication is much too broad and is inconsistent with the effort to develop results-based standards which would have a measurable and observable effect on the reliability of the bulk electric system. The definition of Interoperability Communication, as written, can include virtually any information exchange/instruction between entities, both routine and emergency. Such communication may or may not have a measurable and observable effect on bulk system reliability. Since the broad term Interoperability Communication is used in every requirement in COM-003-1, entities will be required to use the English language, the central time zone, and 3-part communication in even the most routine exchanges of information. This could create a burden on operating personnel and a distraction from their reliability duties. This group does not feel the need for a definition of Interoperability Communication, since the term Reliability Directive has been defined in draft standard COM-002-3, which is currently posted for review. The Reliability Directive term is emergency-focused and consistent with the results-based standards process.</p>

Organization	Yes or No	Question 1 Comment
		<p>Response: The proposed term “Interoperability Communication” has been removed from the standard. Instead the SDT is proposing the new term “Operating Communications,” which includes all communications that change or maintain the state, status, output, or input of an Element or Facility of the Bulk Electric System. Routine operations that would affect the BES as described would be subject to the use of the communication protocols in COM 003. The SDT believes the term Reliability Directives as defined in COM 002-03 does not fully address the range of miscommunication risks that could seriously impact the reliability of the BES.</p> <p>The SDT does not believe its work to be inconsistent with results-based principles. The Need or Problem Statement for this standard is that miscommunication can lead to action or inaction harmful to the reliability of BES. This was identified by the NERC President in his January 2011 report to the industry as one of the eight top priority issues for BPS reliability, and there are a number of events that have occurred in the past where miscommunication was a contributing factor to the event or exacerbated the severity of the event. The goal, therefore, is to specify clear, formal and universally applied communication protocols that reduce the possibility of miscommunication. The key objective to accomplish this goal is to use communication protocols to reduce or correct misunderstandings. The requirements have been written to accomplish this objective, and are and risk-mitigating requirements (while operator performance is measured, the actions themselves are primarily designed to mitigate the risk of miscommunication that could lead to poor BES performance). We believe this standard is consistent with results-based principles, and it will improve the reliability of the BES.</p> <p>In addition, the definition of Three-part Communication in this standard does not match the three-part communication requirements stated in COM-002-3. In COM-002-3, the requirements for three-part communication (state - repeat - acknowledge) apply to Reliability Directives, while in COM-003-1 the definition of Three-part Communication refers to “information” in general. If, as stated in the Disposition of Requirements, the revisions to COM-002-3 will be moved to COM-003-1, the definition of Three-part Communication in this draft standard should be consistent with the requirements of COM-002-3. The way the definition of Three-part Communication is worded applies only when the communication is understood by the listener the first time. Because the definition requires the listener to repeat the information back correctly, failure of the listener to understand the information the first time could be construed as a violation or at least not fitting the definition. The definition should rather reflect that three-part communication is an</p>

Organization	Yes or No	Question 1 Comment
		<p>iterative process that should be followed until the listener is confirmed by the speaker to get the information correct.</p> <p>We suggest the definition be revised as follows:”</p> <p>A Communications Protocol where information is verbally stated by a party initiating a communication, the information is repeated back to the party that initiated the communication by the second party that received the communication, and the information is verbally confirmed to be correct or corrected by the party who initiated the communication. The protocol should be followed until the party issuing the information is satisfied that a party receiving the information has understood the communication and confirmed it.</p> <p>Response: The SDT has eliminated the definition of three-part communication and has incorporated the performance of three-part communication into the language of Requirements R2 and R3 in the second draft of COM-003. The SDT has also added language to applicable requirements to specify repeat-backs are not required to be verbatim.</p> <p>”Both element and facility are used in the Interoperability Communication definition and are NERC defined terms. Did the drafting team intend that the NERC definitions should apply? Then the terms need to be capitalized.</p> <p>Response: The SDT agrees and has done so within the new term, “Operating Communications”.</p>
<p>Response: The SDT thanks you for your comments. Please see our responses above</p>		
<p>SERC OC&SOS Standards Review Group</p>	<p>Disagree</p>	<p>We feel that the definition of Interoperability Communication is much too broad and is inconsistent with the effort to develop results-based standards. Adherence to such results-based standards would have a measurable and observable effect on the reliability of the bulk electric system. The definition of Interoperability Communication, as written, can include virtually any information exchange/instruction between entities, both routine and emergency. Such communication may or may not have a measurable and observable effect on bulk system reliability. The concern is that, since the broad term Interoperability Communication is used in every requirement in COM-003-1, entities will be required to use the English language, the central time zone, and 3-part communication in even the most routine exchanges of information. This could create a burden on operating personnel and a distraction from their reliability duties. This group does not feel the need for a definition of Interoperability Communication, since the term</p>

Organization	Yes or No	Question 1 Comment
		<p>Reliability Directive has been defined in draft standard COM-002-3, which is currently posted for review. The Reliability Directive term is emergency-focused and consistent with the results-based standards process.</p> <p>Response: The SDT is eliminating the term Interoperability Communications because of comments citing ambiguity. We have revised the draft standard by defining the new term “Operating Communications.” With this new definition requiring the protocols for all operations that change or maintain the state, status, output, or input of an Element or Facility of the Bulk Electric System, the SDT believes it has removed any ambiguity over the utilization of communication protocols between or among Functional Entities in the same or in other organizations.</p> <p>The SDT does not believe its work to be inconsistent with results-based principles. The Need or Problem Statement for this standard is that miscommunication can lead to action or inaction harmful to the reliability of BES. This was identified by the NERC President in his January 2011 report to the industry as one of the eight top priority issues for BPS reliability, and there are a number of events that have occurred in the past where miscommunication was a contributing factor to the event or exacerbated the severity of the event. The goal, therefore, is to specify clear, formal and universally applied communication protocols that reduce the possibility of miscommunication. The key objective to accomplish this goal is to use communication protocols to reduce or correct misunderstandings. The requirements have been written to accomplish this objective, and are and risk-mitigating requirements (while operator performance is measured, the actions themselves are primarily designed to mitigate the risk of miscommunication that could lead to poor BES performance). We believe this standard is consistent with results-based principles, and it will improve the reliability of the BES.</p> <p>In addition, the definition of Three-part Communication in this standard does not match the three-part communication requirements stated in COM-002-3. In COM-002-3, the requirements for three-part communication (state - repeat - acknowledge) apply to Reliability Directives, while in COM-003-1 the definition of Three-part Communication refers to “information” in general. If, as stated in the Disposition of Requirements, the revisions to COM-002-3 will be moved to COM-003-1, the definition of Three-part Communication in this draft standard should be consistent with the requirements of COM-002-3.</p> <p>Response: The SDT has eliminated the definition of three-part communication and has incorporated the performance of three-part communication into the language of Requirements R2 and R3 in the second draft</p>

Organization	Yes or No	Question 1 Comment
		of COM-003. The SDT agrees with your comments on consistency between the 2 standards.
Response: The SDT thanks you for your comments. Please see our responses above		
NIPSCO	Agree	When COM-002-3 is fully incorporated, more definitions such as Reliability Directive will need to be added.
Response: The SDT thanks you for your comments.		
Duke Energy	Disagree	<p>When viewed in the context of its use in R5 and R6, the definition of Interoperability Communication is excessively broad and unclear. R5 refers to the issuing of a “directive” during verbal Interoperability Communications. The term “directive” is undefined.</p> <p>R6 requires the use of the NATO phonetic alphabet during verbal Interoperability communications such as directives, notifications, directions, instructions, orders or other reliability related operating information. This could conceivably encompass all communications.</p> <p>Response: The proposed term “Interoperability Communication” has been removed from the revised standard. Instead the SDT is proposing the new term “Operating Communications,” which includes all communications that change or maintain the state, status, output, or input of an Element or Facility of the Bulk Electric System.</p> <p>Also, the definition refers to communications between two or more “entities”. Does “entities” refer to functional entities or registered entities?</p> <p>Response: The new term “Operating Communications” does not contain the word “entities.”</p>
Response: The SDT thanks you for your comments. Please see our responses above		
Westar Energy	Disagree	Would like to see the Interoperability Communication definition be more specific.
<p>Response: The SDT thanks you for your comments.</p> <p>The proposed term “Interoperability Communication” has been removed from the standard. Instead the SDT is proposing the new term “Operating Communications,” which includes all communications that change or maintain the state, status, output, or input of an Element or Facility of the Bulk Electric System. The SDT believes this is more specific.</p>		

2. The SDT incorporated TOP-002-2 Requirement R18 into this new standard COM-003-1 as Requirement R7. In TOP-002-2, Requirement R18 applies to the Transmission Service Provider and Load Serving Entity. These entities are now added to COM-003-1. Do you agree with this proposal? If not, please explain in the comment area.

Summary Consideration: While many commenters did agree with the proposal, most commenters who responded to this question disagreed with the proposal.

The dissenting commenters addressed several key issues. Many indicated that Requirement R7 should not be applicable to TSPs and LSEs because these entities were not included in the SAR for this project. The SDT agrees and has removed TSPs and LSEs from the standard to be consistent with the approved SAR.

Additional commenters indicated the word “equipment” as used in Requirement R7 was too broad. The standard has been modified to use the defined terms “Element” and “Facility” instead in the revised standard Part 1.1.4.

Other commenters indicated Requirement R7 addressed a planning function already included in TOP-002, and should not be included in COM-003. While the SDT agrees that TOP-002-2a R18 is a planning function the drafting team working on TOP-002 revisions under Project 2007-03 has proposed retiring this requirement, and the OPCP SDT believes communications between entities would be improved when use of pre-determined identifiers is required for interface Elements and Facilities. The SDT proposes the concept of R7 be retained and transferred to Requirement R1, Part 1.1.4.

Commenters indicated a general consensus for the mandatory use of line and equipment identifiers applying only to interface Elements, not Elements or Facilities internal to the footprint of the entity. The SDT agreed, and modified the standard to apply only to interface Elements and Facilities.

Some additional comments were received indicating the previously posted standard was too prescriptive in specifying “how” to communicate, instead of “what.” They also indicated the proposed standard was unnecessary and would distract operators from reliably controlling the system. The SDT disagreed based on Blackout Task Force Report recommendation 26, which calls for tightening communication to improve reliability. The SDT proposes that the second draft of the standard is more focused on “what” protocols to use in specific situations.

There were additional comments that uniform and mutually agreed line and equipment identifiers should not be mandated so long as the identifiers are pre-determined. The SDT agrees documentation of mutual agreement is not necessary, so long as the identifiers are pre-determined, understood and used during Operating Communications. The standard has been modified to reflect this change – Requirement R7 was absorbed into R1 as Part 1.1.4 as shown below:

R1. Each Reliability Coordinator, Transmission Operator, Balancing Authority, Generator Operator, and Distribution Provider shall use the following communications protocols:

1.1 When participating in oral or written Operating Communications:

1.1.4. When referring to a Transmission interface Element or Transmission interface Facility, use the name specified by the owner(s) for that Transmission interface Element or Transmission Facility.

Organization	Yes or No	Question 2 Comment
Ameren	Agree	
American Municipal Power	Agree	
British Columbia Transmission Corporation	Agree	
Bureau of Reclamation	Agree	
California Independent System Operator	Agree	
ERCOT ISO	Agree	
ExxonMobil Research and Engineering	Agree	
FirstEnergy	Agree	
Georgia Transmission	Agree	

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Organization	Yes or No	Question 2 Comment
Corp		
Long Island Power Authority	Agree	
New York State Reliability Council	Agree	
NIPSCO	Agree	
NYSEG	Agree	
Oncor Electric Delivery	Agree	
Orange and Rockland Utilities, Inc.	Agree	
PacifiCorp	Agree	
PEF	Agree	
Pepco Holdings, Inc. - Affiliates	Agree	
PowerSouth Energy	Agree	
South Carolina Electric and Gas	Agree	
Sunflower Electric Power Corp.	Agree	

Organization	Yes or No	Question 2 Comment
Sunflower Electric Power Corporation	Agree	
Transmission System Operations	Agree	
Westar Energy	Agree	
Western Area Power Administration	Agree	
Xcel Energy	Agree	
Washington City Light & Power	Disagree	
The Empire District Electric Company	Disagree	<p>A more efficient method of designation common pre-determined line and equipment identifiers would be through the Reliability Coordinator. Having the Reliability Coordinator establish this would create a single methodology as opposed to several different methodologies that would have to be agreed upon between entities and a significant amount of work for all entities.</p>
<p>The SDT thanks you for your comments. The second draft of the standard requires that, when referring to a Transmission interface Element/Facility, entities must use the name specified by the owner(s) of that Element /Facility. We believe that assignment to be the most appropriate since it will not require any entity to change its existing practice.</p>		
Santee Cooper	Disagree	<p>A TSP and LSE should not be subjected to other requirements within the COM 003 Standard such as Three-part Communications.</p> <p>In addition, R18 of TOP002-2 required the use of uniform line identifiers among neighboring BAs. As this requirement (R7) is now written in COM003 it is not clear that this is when the use of uniform line identifiers is required. As currently written, it could be interpreted that the use of uniform line identifiers is required for all communication which is more restricting.</p>

Organization	Yes or No	Question 2 Comment
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT reviewed the SAR and has removed TSPs and LSEs as applicable entities.</p> <p>The second draft of the standard requires that, when referring to a Transmission interface Element/Facility, entities must use the name specified by the owner(s) of that Element /Facility.</p>		
<p>E.ON U.S. LLC</p>	<p>Disagree</p>	<p>As the requirement already exists it is redundant to incorporate it into COM-003. The incorporation not only exposes a responsible entity to double jeopardy, it now exposes Transmission Service Providers and LSEs to COM-003 requirements that should not apply to these entities.</p> <p>Response: The SDT reviewed the SAR and has removed TSPs and LSEs as applicable entities consistent with your comments.</p> <p>TOP-002 addresses planning ahead of the operating hour whereas COM-003 addresses communication during real-time operations. In the absence of evidence that the lack of common identifiers is an imminent and continuing risk to BES reliability, it does not make sense to have operators addressing urgent, real-time situations bear significant penalty risk should they refer a BES element by something other than a newly established common identifier.</p> <p>Response: The drafting team working on revisions to TOP-002-2a has recommended retiring R18. The OPCP SDT believes this requirement is necessary in COM-003-1 for reliable real-time operations. Not ensuring that operators are communicating about the same piece of equipment can lead to actions or inactions that could compromise reliability.</p> <p>Is it the intent of the requirement that the common identifiers be the same for all neighboring parties, all of whom must “agree” to the identification? If not, then an element might be referred to by one identifier with Party A, another with Party B etc. which might well defeat the purpose of the requirement. If it is required that there be a single identifier, then all neighbors would have to agree upon the identifier constrained as each may be by, for example, the formatting limitation of their respective SCADA/EMS systems.</p> <p>Response: The second draft of the standard no longer requires explicit agreement. The new Requirement R1 Part 1.1.4 calls for the owner of the transmission asset to specify the name for its interface Elements and Facilities.</p>

Organization	Yes or No	Question 2 Comment
		<p>Cost to modify software to accommodate common identifiers could be significant and NERC should weigh these costs and the aforementioned operational risks against the perceived incremental improvements to the BES reliability.</p> <p>Response: The standard does not require modifications to software. To the extent entities wish to modify their internal systems to facilitate this requirement, the SDT disagrees the cost to modify software would be significant, as it would be limited to <u>only</u> interface Elements/Facilities as stated in R1.1.4 of the second draft of the standard.</p>
<p>Response: The SDT thanks you for your comments. Please see our responses above.</p>		
<p>American Electric Power</p>	<p>Disagree</p>	<p>Based on definitions provided in the functional model, the inclusion of the TSP and LSE in this standard is inappropriate. These entities manage the relationship with the end-use customer and are not responsible for the operation or maintenance of BES facilities.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT reviewed the SAR and has removed TSPs and LSEs as applicable entities.</p>		
<p>We Energies</p>	<p>Disagree</p>	<p>Because applicability to a TSP and LSE of this standard stems solely from TOP-002-2 R18, R7 should be the only requirement that applies to a TSP or LSE.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT reviewed the SAR and has removed TSPs and LSEs as applicable entities.</p>		
<p>Bonneville Power Administration</p>	<p>Disagree</p>	<p>BPA Would like further clarification about what is meant by “pre-determined, mutually agreed upon line and equipment identifiers”.</p> <p>Response: The second draft of the standard requires that, when referring to a Transmission interface Element/Facility, entities must use the name specified by the owner(s) of that Element /Facility.</p> <p>Is it a specified format no matter which part of the system is being used, or is it only for 115 kV and above as it applies to LSE’s and TSP’s. If it only refers to Transmission equipment above 115 kV, then BPA would likely agree.</p> <p>Response: The SDT has limited the standard to communication with the intent to change or maintain the state,</p>

Organization	Yes or No	Question 2 Comment
		<p>status, output, or input of an Element or Facility of the Bulk Electric System (see definition of “Operating Communications.” As such, the format would only apply in those situations. In addition, the SDT removed LSEs and TSPs as responsible entities in the second draft of the standard.</p>
<p>Response: The SDT thanks you for your comments. Please see our responses above.</p>		
<p>Old Dominion Electric Cooperative</p>	<p>Disagree</p>	<p>Comments: We believe that it may be important for entities registered as a Reliability Coordinator, Balancing Authority, Transmission Owner, Transmission Operator, Generator Operator, Transmission Service Provider , Load Serving Entity and Distribution Provider to have a formalized Communications Protocol Operating Procedure (CPOP) for Interoperability Communications, but this requirement will place an unnecessary burden on the personnel at many of the smaller Load Serving Entities and Distribution Providers on the NERC Compliance Registry. In most real-time scenarios, the BES facilities are not operated nor maintained by the Load Serving Entity or Distribution Provider. As with many standards, entities will be required to demonstrate why the standard/requirement is applicable. We suggest the drafting team consider modifying the applicability of this standard as follows similar to the format used in PRC-OO5:4.</p> <p>Applicability:</p> <ul style="list-style-type: none"> 4.1. Transmission Operator 4.2. Transmission Owner 4.3. Balancing Authority 4.4. Reliability Coordinator 4.5. Generator Operator 4.6. Distribution Provider that is responsible for Real-time generation control and Real-time operation of the interconnected Bulk Electric System 4.7. Transmission Service Provider 4.8. Load Serving Entity that is responsible for Real-time generation control and Real-time operation of the interconnected Bulk Electric System
<p>Response: The SDT thanks you for your comments and suggestion. The SDT has deleted the requirement for a Communications Protocol Operating Procedure. The SDT reviewed the SAR and has removed TSPs and LSEs as applicable entities; however DPs were included as applicable entities and have been</p>		

Organization	Yes or No	Question 2 Comment
<p>retained in COM-003-1. The specified role of the DP to shed load justifies the retention of the DP as an applicable Entity.</p>		
<p>Electric Market Policy</p>	<p>Disagree</p>	<p>In our experience, neither the TSP nor the LSE provide or receive information about specific lines or equipment in real-time. Therefore, requirement R7 should not apply to them absent clear evidence that a realistic (not hypothetical) threat to reliability would exist if they are omitted. We do not think that such a threat would exist. Applying R7 to TSPs and LSEs would only cause them grief and further burden the compliance staffs of the regional entities for no appreciable benefit.</p>
<p>Response: The SDT thanks you for your comments. The SDT reviewed the SAR and has removed TSPs and LSEs as applicable entities.</p>		
<p>Kansas City Power & Light</p>	<p>Disagree</p>	<p>Including “equipment” is too broad. This could mean anything and should be limited to transmission devices that could affect the reliable operation of the bulk electric system.</p>
<p>Response: The SDT thanks you for your comments. R7 (now R1.1.4) has been revised in the second draft of the standard, and refers to interface Elements and interface Facilities rather than “equipment”.</p>		
<p>PPL</p>	<p>Disagree</p>	<p>It is not clear what real time communications take place with a TSP and/or a LSE that would put the BES in jeopardy and thus necessitate them to be included as an applicable entity.</p>
<p>Response: The SDT thanks you for your comments. The SDT reviewed the SAR and has removed TSPs and LSEs as applicable entities.</p>		
<p>Manitoba Hydro</p>	<p>Disagree</p>	<p>Leave TOP-002-2 R18 in its original location. 1) “Mutual line and equipment identifiers” should not be moved from TOP-002-2 and placed in COM-003-1 R7. TOP-002-2 Standard’s focus is “Planning, coordination and procedures” whereas: o R1 is “Maintain current Plans” o R2 is “Participate in planning and design” o R3 is “LSE coordinate with Host” o R4 is “BA coordinate with neighbours” o R5 is “plan to meet schedules”</p>

Organization	Yes or No	Question 2 Comment
		<p>o R6 is “plan to meet N-1”</p> <p>o R7 is “plan to meet capacity and reserves”</p> <p>o R8 is “plan to meet VAR limits”</p> <p>o R9 is “plan to meet interchange”</p> <p>o R10 is “plan to meet IROL, SOL’s”</p> <p>o R11 is “perform studies for SOL’s” and “utilize identical SOL’s for common facilities”</p> <p>o R12 is “include known SOLs or IROLs”</p> <p>o R13 is “GO shall verify generation capability”</p> <p>o R14 is “GO shall notify of changes”</p> <p>o R15 is “GO shall provide generation forecast”</p> <p>o R16 is “shall notify RC of changes”</p> <p>o R17 is “notify RC of R1 to R16”</p> <p>o R18 is “shall use uniform identifiers”</p> <p>o R19 is “maintain computer models for planning”</p> <p>2)TOP-002-2 R18 “shall use uniform identifies” appears to be more strongly related to where it already exists and would have more impact to have it moved between R2 and R3.</p> <p>3) Uniform identifiers are determined in the planning stages and are common knowledge to entities by the time they are in service and not a real time communication issue.</p> <p>a. Having TOP-002-2 R18 moved to COM-003-1 R7, takes the purpose of the COM-003 standard outside its context of “timely convey reliability information . . . especially during alerts and emergencies”.</p> <p>b.COM-003-1’s purpose and all its requirements directly relate to real time communication.</p> <p>4) TOP-002-2 R11 “identical SOL’s for common facilities” complements R18 “shall use uniform identifiers” and again are both planning requirements. 5)The unofficial comment for “Pre-determined Line and Equipment Identifiers” indicates that mutual agreement of these identifiers are to be reached in advance, thus agreeing with above.</p> <p>Leave R18 in TOP-002-2, but possibly move it between R2 and R3, thus R2 in COM-003-1 would be removed.</p> <p>Response: The drafting team working on revisions to TOP-002-2a has recommended retiring R18. The OPCP SDT believes communications between entities would be improved when use of pre-determined identifiers is</p>

Organization	Yes or No	Question 2 Comment
		<p>required for interface Elements and Facilities. The SDT proposes the concept of R7 being retained and transferred to R1 Part 1.1.4. The SDT feels that this requirement is appropriate under COM-003, as the use of pre-determined names for interface Elements/Facilities during oral and written Operating Communications supports the purpose of COM-003.</p> <p>Regarding adding TSP and LSE, no comment added.</p> <p>Response: The SDT reviewed the SAR and has removed TSPs and LSEs as applicable entities.</p>
<p>Response: The SDT thanks you for your comments. Please see our responses above.</p>		
Tri-State Generation & Transmission Assoc.	Disagree	LSE and TSP are not responsible for the reliability of the Bulk Electric System. That responsibility resides with the TOP.
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT reviewed the SAR and has removed TSPs and LSEs as applicable entities.</p>		
National Grid		National Grid has no specific stand either ways. However, please refer to response to Question 8 for issues pertaining to the language of the requirement.
<p>Response: The SDT thanks you for your comments.</p> <p>Please refer to the SDT response to Question 8.</p>		
NERC Staff	Disagree	NERC staff agrees with the proposal, but would offer the following modification in order to add clarity. We recommend that the phrase “when issuing directives, notifications, directions, instructions, orders or other reliability related operating information that involves alpha-numeric information during verbal Interoperability Communications” be replaced with “when verbal Operating Communications with alpha-numeric information is involved.” This would utilize the definition of Operating Communications offered in the response to Question 1. This will hopefully eliminate the need to further define what communication is or is not included in the phrase “directives, notifications, directions, instructions, orders or other reliability related operating information.”
<p>Response: The SDT thanks you for your comments.</p>		

Organization	Yes or No	Question 2 Comment
<p>The SDT agrees with your comments and has incorporated the Operating Communications revisions to R7 (now R1 Part 1.1.4) in the second draft of the standard.</p>		
<p>Pacific Northwest Small Utilities Comment Group</p>		<p>Our utilities agree with the move in principle, but are concerned about the transition. How will NERC ensure that registered entities are not doubly jeopardized during the time when the same requirement exists in two active standards? The addition of LSE to COM-003 goes way beyond the obligations in TOP-002-2 R18; LSE’s are now in every requirement of COM-003.</p>
<p>Response: The SDT thanks you for your comments. The drafting team working on revisions to TOP-002-2a has recommended retiring R18. The OPCP SDT believes communications between entities would be improved when use of pre-determined identifiers is required for interface Elements and Facilities. The SDT proposes the concept of R7 being retained and transferred to R1 Part 1.1.4. The SDT reviewed the SAR and has removed TSPs and LSEs as applicable entities.</p>		
<p>Puget Sound Energy</p>	<p>Disagree</p>	<p>PSE agrees in the consolidation of communication type activities into one standard; however the blanket addition of the TSP and LSE across all requirements doesn't seem appropriate. Additional thought should be given in the potential for these two entities to participate in the communication activities contemplated by each requirement, rather than incorporating them wholesale. For example, a quick search on the term “directive” in the current set of standards indicated that neither Transmission Service Providers or Load Serving Entities (or even some of the other entities covered by the proposed standard) are likely to issue directives under the requirements of those standards, so is it appropriate to subject them to the requirements of Requirement 5?</p>
<p>Response: The SDT thanks you for your comments. The SDT reviewed the SAR, agrees with your comments and has removed TSPs and LSEs as applicable entities.</p>		
<p>PJM</p>	<p>Disagree</p>	<p>Requirement R7, regarding the use of pre-determined line & equipment identifiers, applies to TSPs & LSEs. However, the other requirements of this standard do not seem to apply to these entities. For instance, most of the reliability-related alerts are communicated through the Reliability Coordinator Information System (RCIS). TSPs do not have access to this real-time communication tool, so the TSP should not be included in the applicability for the entire standard. Response: The SDT reviewed the SAR, agrees with your comments and has removed TSPs and LSEs as applicable entities.</p>

Organization	Yes or No	Question 2 Comment
		<p>Furthermore, Requirement R18 in TOP-002-2 mandated that neighboring Balancing Authorities use the uniform line identifiers. In COM-003-1, this requirement is lost, since Requirement R7 makes no mention of neighboring BAs.</p> <p>Response: The SDT understands the comment in regard to the use of the word “neighboring”. The SDT agrees and has modified Requirement R7 to only apply to interface Elements/Facilities.</p> <p>This requirement represents a “how” and not a “what”. In general, standards should be focused on “what” not how. The only real need for a requirement is to establish that each entity issuing a directive shall use three-part communications and the recipient of a directive shall also properly participate in the of use three-part communication protocol until the message has been correctly spoken and comprehended.</p> <p>Response: The OPCP SDT was chartered to develop Communication Protocols for Operating Personnel. The SDT proposes that the second draft of the standard is more focused on “what” protocols to use in specific situations. In addition to three-part communication, the SDT believes the standard should consider other necessary protocols that prevent miscommunication.</p>
<p>Response: The SDT thanks you for your comments. Please see our responses above.</p>		
<p>PJM SOS Comments</p>	<p>Disagree</p>	<p>Requirement R7, regarding the use of pre-determined line & equipment identifiers, applies to TSPs & LSEs. However, the other requirements of this standard do not seem to apply to these entities. For instance, most of the reliability-related alerts are communicated through the Reliability Coordinator Information System (RCIS). TSPs do not have access to this real-time communication tool, so the TSP should not be included in the applicability for the entire standard.</p> <p>Response: The SDT reviewed the SAR, agrees with your comments and has removed TSPs and LSEs as applicable entities.</p> <p>Furthermore, Requirement R18 in TOP-002-2 mandated that neighboring Balancing Authorities use the uniform line identifiers. In COM-003-1, this requirement is lost, since Requirement R7 makes no mention of neighboring BAs.</p> <p>Response: The SDT understands the comment in regard to the use of the word “neighboring”. The SDT agrees</p>

Organization	Yes or No	Question 2 Comment
		<p>and has modified Requirement R7 (now R1 Part 1.1.4) to only apply to interface Elements/Facilities.</p> <p>This requirement represents a “how” and not a “what”. In general, standards should be focused on “what” not how. The only real need for a requirement is to establish that each entity issuing a directive shall use three-part communications and the recipient of a directive shall also properly participate in the of use three-part communication protocol until the message has been correctly spoken and comprehended.</p> <p>Response: The OPCP SDT was chartered to develop Communication Protocols for Operating Personnel. The SDT proposes that the second draft of the standard is more focused on “what” protocols to use in specific situations. In addition to three-part communication, the SDT believes the Standard should address other necessary protocols that prevent miscommunication.</p>
<p>Response: The SDT thanks you for your comments. Please see our responses above.</p>		
<p>Southern Company Transmission</p>	<p>Disagree</p>	<p>Southern Company supports SERC SOS comments.</p> <p>SERC SOS comments:</p> <p>Requirement R7, regarding the use of pre-determined line & equipment identifiers, applies to TSPs & LSEs. However, the other requirements of this standard do not seem to apply to these entities. For instance, most of the reliability-related alerts are communicated through the Reliability Coordinator Information System (RCIS). TSPs do not have access to this real-time communication tool, so the TSP should not be included in the applicability for the entire standard.</p> <p>Response: The SDT reviewed the SAR, agrees with your comments and has removed TSPs and LSEs as applicable entities.</p> <p>Furthermore, Requirement R18 in TOP-002-2 mandated that neighboring Balancing Authorities use the uniform line identifiers. In COM-003-1, this requirement is lost, since Requirement R7 makes no mention of neighboring BAs.</p> <p>Response: The SDT understands the comment in regard to the use of the word “neighboring”. The SDT agrees and has modified Requirement R7 to only apply to interface Elements/Facilities.</p> <p>Southern Company comments:</p>

Organization	Yes or No	Question 2 Comment
		<p>No proposed revision to remove R18 from TOP-002-2 has been provided in this SDT proposal. If this standard is adopted and TOP-002-2 is not revised at the same time the same requirement will be in two reliability standards.</p> <p>Response: The drafting team working on revisions to TOP-002-2a has recommended retiring R18. The OPCP SDT team believes communications between entities would be improved when use of pre-determined identifiers is required for interface Elements and Facilities. The SDT proposes the concept of R7 being retained and transferred to R1 Part 1.1.4.</p>
<p>Response: The SDT thanks you for your comments. Please see our responses above.</p>		
<p>Florida Municipal Power Agency (FMPA) and some members</p>	<p>Agree</p>	<p>The implementation plan does not specify that TOP 002 2, R18 will be retired. The disposition of the SAR explains this, but, it should be clear in the implementation plan.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The drafting team working on revisions to TOP-002-2a has recommended retiring R18. The OPCP SDT believes communications between entities would be improved when use of pre-determined identifiers is required for interface Elements and Facilities. The SDT proposes the concept of R7 be retained and transferred to R1 Part 1.1.4.</p>		
<p>Indiana Municipal Power Agency</p>	<p>Disagree</p>	<p>The OPCP SDT does not give a real justified reason on making this requirement move from TOP-002-2 to COM-003-1, except saying that the team believes it is appropriate. Unless there is a very sound or technical justification for moving it, the requirement should be left in the current standard (TOP-002-2) to reduce the extra work and confusion this may cause among</p> <p>Response: The drafting team working on revisions to TOP-002-2a has recommended retiring R18. The OPCP SDT believes communications between entities would be improved when use of pre-determined identifiers is required for interface Elements and Facilities. The SDT proposes the concept of R7 being retained and transferred to R1 Part 1.1.4.</p> <p>In addition, since Inoperability Communication is not clearly defined, if two LSE entities are communicating, do they have to follow the communication protocol required in COM-003?</p> <p>Response: The SDT reviewed the SAR and has removed TSPs and LSEs as applicable entities.</p>

Organization	Yes or No	Question 2 Comment
<p>Response: The SDT thanks you for your comments. Please see our responses above.</p>		
PSEG Companies	Disagree	<p>The PSEG Companies agree with the concerns expressed in the comments filed by the PJM System Operations Subcommittee (SOS) Group.</p>
<p>Response: The SDT thanks you for your comments. Please refer to our response to the comments filed by the PJM System Operations Subcommittee (SOS) Group.</p>		
Dynergy	Disagree	<p>The SDT actually expanded Requirement R18 of TOP-002-2 by adding the term “equipment”. In any event, this Requirement represents a “how” and not a “what”. In general, standards should be focused on “what” not how.</p> <p>Response: The SDT appreciates the comment in regard to the use of the word “equipment”. The SDT agrees and has modified Requirement R7 to only apply to interface Elements/Facilities.</p> <p>The OPCP SDT was chartered to develop Communication Protocols for Operating Personnel.</p> <p>The SDT proposes that the second draft of the standard is more focused on “what” protocols to use in specific situations.</p> <p>The only real need for a requirement is to establish that each entity issuing a directive shall use three-part communications and the recipient of a directive shall also properly participate in the use of the three-part communication protocol until the message has been correctly spoken and comprehended.</p> <p>Response: In addition to three-part communication, the SDT believes the standard should address other protocols that prevent miscommunication.</p>
Midwest ISO Standards Collaborators	Disagree	<p>The SDT actually expanded Requirement R18 of TOP-002-2 by adding the term “equipment”.</p> <p>Response: The SDT appreciates the comment in regard to the use of the word “equipment”. The SDT agrees and has modified Requirement R7 (now R1 Part 1.1.4) to only apply to interface Elements/Facilities.</p> <p>In any event, this Requirement represents a “how” and not a “what”. In general, standards should be focused on “what” not how. The only real need for a requirement is to establish that each entity issuing a directive shall use three-part communications and the recipient of a directive shall also properly participate in the of use three-part communication protocol until the message has been correctly spoken and comprehended.</p> <p>Response: The OPCP SDT was chartered to develop Communication Protocols for Operating Personnel. The SDT</p>

Organization	Yes or No	Question 2 Comment
		<p>proposes that the second draft of the standard is more focused on “what” protocols to use in specific situations. In addition to three-part communication, the SDT believes the standard should consider protocols that prevent miscommunication.</p>
<p>Response: The SDT thanks you for your comments. Please see our responses above.</p>		
<p>Hydro-Québec TransEnergie</p>	<p>Disagree</p>	<p>The SDT expanded Requirement R18 of TOP-002-2 by adding the term “equipment”.</p> <p>Response: The SDT appreciates the comment in regard to the use of the word “equipment”. The SDT agrees and has modified Requirement R7 (now R1 Part 1.1.4) to only apply to interface Elements/Facilities</p> <p>This Requirement represents a “how” and not a “what”. In general, standards should be focused on “what” not how.</p> <p>The only real need for a requirement is to establish that each entity issuing a directive shall use three-part communications and the recipient of a directive shall also properly participate in the of use three-part communication protocol until the message has been correctly spoken and understood.</p> <p>Response: The OPCP SDT was chartered to develop Communication Protocols for Operating Personnel. The SDT proposes that the second draft of the standard is more focused on “what” protocols to use in specific situations. In addition to three-part communication, the SDT believes the standard should consider other protocols that prevent miscommunication.</p> <p>LSEs and TSPs do not own or operate equipment, and as such should not fall under the mandates of this requirement. Neither the TSP nor the LSE provide or receive information about specific lines or equipment in real-time. Therefore, requirement R7 should not apply to them absent clear evidence that a realistic (not hypothetical) threat to reliability would exist if they are omitted. We do not think that such a threat would exist.</p> <p>Response: The SDT reviewed the SAR, agrees with your comment and has removed TSPs and LSEs as applicable entities.</p>
<p>Response: The SDT thanks you for your comments. Please see our responses above.</p>		
<p>Northeast Power</p>	<p>Disagree</p>	<p>The SDT expanded Requirement R18 of TOP-002-2 by adding the term “equipment”.</p> <p>Response: The SDT appreciates the comment in regard to the use of the word “equipment”. The SDT agrees and</p>

Organization	Yes or No	Question 2 Comment
Coordinating Council		<p>has modified Requirement R7 (now R1 Part 1.1.4) to only apply to interface Elements/Facilities.</p> <p>This Requirement represents a “how” and not a “what”. In general, standards should be focused on “what” not how.</p> <p>The only real need for a requirement is to establish that each entity issuing a directive shall use three-part communications and the recipient of a directive shall also properly participate in the of use three-part communication protocol until the message has been correctly spoken and understood.</p> <p>Response: The OPCP SDT was chartered to develop Communication Protocols for Operating Personnel. In addition to three-part communication, the SDT believes the Standard should address other protocols that prevent miscommunication.</p> <p>LSEs and TSPs do not own or operate equipment, and as such should not fall under the mandates of this requirement. Neither the TSP nor the LSE provide or receive information about specific lines or equipment in real-time. Therefore, requirement R7 should not apply to them absent clear evidence that a realistic (not hypothetical) threat to reliability would exist if they are omitted. We do not think that such a threat would exist.</p> <p>Response: The SDT reviewed the SAR, agrees with your comment and has removed TSPs and LSEs as applicable entities.</p>
Northeast Utilities	Disagree	<p>The SDT expanded Requirement R18 of TOP-002-2 by adding the term “equipment”.</p> <p>Response: The SDT appreciates the comment in regard to the use of the word “equipment”. The SDT agrees and has modified Requirement R7 (now R1 Part 1.1.4) to only apply to interface Elements/Facilities.</p> <p>This Requirement represents a “how” and not a “what”. In general, standards should be focused on “what” not how.</p> <p>The only real need for a requirement is to establish that each entity issuing a directive shall use three-part communications and the recipient of a directive shall also properly participate in the of use three-part communication protocol until the message has been correctly spoken and understood.</p> <p>Response: The OPCP SDT was chartered to develop Communication Protocols for Operating Personnel. The SDT proposes that the second draft of the standard is more focused on “what” protocols to use in specific situations.</p>

Organization	Yes or No	Question 2 Comment
		<p>In addition to three-part communication, the SDT believes the Standard should address other protocols that prevent miscommunication.</p> <p>LSEs and TSPs do not own or operate equipment, and as such should not fall under the mandates of this requirement. Neither the TSP nor the LSE provide or receive information about specific lines or equipment in real-time. Therefore, requirement R7 should not apply to them absent clear evidence that a realistic (not hypothetical) threat to reliability would exist if they are omitted. We do not think that such a threat would exist.</p> <p>Response: The SDT reviewed the SAR, agrees with your comment and has removed TSPs and LSEs as applicable entities</p>
<p>Response: The SDT thanks you for your comments. Please see our responses above.</p>		
Progress Energy Carolina, Inc	Disagree	<p>The word "Neighboring" is used in TOP-002 R18. Excluding this word in the proposed COM-003-1 means that each entity would have to coordinate the uniform identifiers with an undefined number of entities in the entire Interconnection.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT agrees and has modified R7 to only apply only to interface Elements and interface Facilities.</p>		
Transmission Agency of Northern California	Disagree	<p>There is no additional reliability benefit to the proposed applicability of COM-003-1 Requirement R7 to Transmission Service Providers (TSP) and Load Serving Entities (LSE), since TSP and LSE must already comply with effectively the same terms in TOP-002-2 Requirement R18. Furthermore, TSP and LSE exposure to penalties and sanctions associated with non-compliance of TOP-002-2 Requirement R18 would effectively be doubled if they were required to also comply with COM-003-1 Requirement R7.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT reviewed the SAR, agrees and has removed TSPs and LSEs as applicable entities. Note that the drafting team working on proposed revisions to TOP-002 has recommended retiring Requirement R18.</p>		
Consumers Energy	Disagree	<p>There is no reason to move R18 from TOP-002 to COM-003. There is also no reason to utilize a shotgun blast method of coverage for this standard. Also, regardless of technical accuracy, TOP-002-2 R18 should not be moved to COM-003-1 without a simultaneous and corresponding change to TOP-002-2, lest an entity be found non-compliant with both standards for a compliance violation.</p>

Organization	Yes or No	Question 2 Comment
<p>Response: The SDT thanks you for your comments. The drafting team working on revisions to TOP-002-2a has recommended retiring R18. The OPCP team believes communications between entities would be improved when use of pre-determined identifiers is required for interface Elements and Facilities. The SDT proposes the concept of R7 be retained and transferred to R1 Part 1.1.4.</p>		
<p>Next Era Energy Resources, LLC</p>	<p>Disagree</p>	<p>This requirement is already covered by TOP-002. If the TOP-002 standard is deemed deficient because certain entities have been excluded or language appears to be missing, the changes need to occur to TOP-002 as opposed to copying and revising the existing requirement elsewhere. This would ensure that compliance oversight, understanding, and adherence goals are unencumbered by unnecessary redundancies. Moreover, this would ensure that the industry continues to re-enforce standards with changes that are within the scope of their original reliability purpose. The latter is in line with one of the core objectives of the Performance-based Reliability Standards Task Force’s recommendations to focus on identifying and minimizing duplicated requirements.</p>
<p>Response: The drafting team working on revisions to TOP-002-2a has recommended retiring R18. The OPCP team believes communications between entities would be improved when pre-determined names are used for referencing interface Elements and Facilities. The SDT proposes the concept of R7 being retained and transferred to R1 Part 1.1.4.</p>		
<p>Transmission Owner</p>	<p>Disagree</p>	<p>This requirement is already covered by TOP-002. If the TOP-002 standard is deemed deficient because certain entities have been excluded or language appears to be missing, the changes need to occur to TOP-002 as opposed to copying and revising the existing requirement elsewhere. This would ensure that compliance oversight, understanding, and adherence goals are unencumbered by unnecessary redundancies. Moreover, this would ensure that the industry continues to re-enforce standards with changes that are within the scope of their original reliability purpose. The latter is in line with one of the core objectives of the Performance-based Reliability Standards Task Force’s recommendations to focus on identifying and aggregating duplicated requirements.</p>
<p>Response: The drafting team working on revisions to TOP-002-2a has recommended retiring R18. The OPCP team believes communications between entities would be improved when use of pre-determined names is required for interface Elements and Facilities. The SDT proposes the concept of R7 be retained and transferred to R1 Part 1.1.4.</p>		
<p>Independent Electricity</p>	<p>Disagree</p>	<p>This requirement represents a “how” and not a “what”. In general, standards should be focused on “what” not how.</p>

Organization	Yes or No	Question 2 Comment
System Operator		<p>The only real need for a requirement is to establish that each entity issuing a directive shall use three-part communications and the recipient of a directive shall also use three-part communication protocol until the message's correct understanding is confirmed.</p> <p>Response: The OPCP SDT was chartered to develop Communication Protocols for Operating Personnel. The SDT proposes that the second draft of the standard is more focused on "what" protocols to use in specific situations. In addition to three-part communication, the SDT believes the Standard should address other protocols that prevent miscommunication.</p>
<p>Response: The SDT thanks you for your comments. Please see our responses above.</p>		
IRC Standards Review Committee	Disagree	<p>This requirement represents a "how" and not a "what". In general, standards should be focused on "what" not how.</p> <p>The only real need for a requirement is to establish that each entity issuing a directive shall use three-part communications and the recipient of a directive shall also properly participate in the of use three-part communication protocol until the message has been correctly spoken and comprehended.</p> <p>Response: The OPCP SDT was chartered to develop Communication Protocols for Operating Personnel. The SDT proposes that the second draft of the standard is more focused on "what" protocols to use in specific situations. In addition to three-part communication, the SDT believes the Standard should address other protocols that prevent miscommunication.</p>
ISO New England Inc.	Disagree	<p>This requirement represents a "how" and not a "what". In general, standards should be focused on "what" not how.</p> <p>The only real need for a requirement is to establish that each entity issuing a directive shall use three-part communications and the recipient of a directive shall also properly participate in the of use three-part communication protocol until the message has been correctly spoken and comprehended.</p> <p>Response: The OPCP SDT was chartered to develop Communication Protocols for Operating Personnel. The SDT proposes that the second draft of the standard is more focused on "what" protocols to use in specific situations. In addition to three-part communication, the SDT believes the Standard should address other protocols that prevent miscommunication.</p>
<p>Response: The SDT thanks you for your comments. Please see our responses above.</p>		

Organization	Yes or No	Question 2 Comment
ATC and ITC	Disagree	<p>TOP-002 R18 states that BA, TOP, GOP TSP and LSE shall use uniform line identifiers when referring to transmission facilities of an interconnected network. COM-003 R7 states that each RC, BA, TO, TOP, GOP, TSP, LSE and DP shall use pre-determined, mutually agreed upon line and equipment identifiers for verbal and written Interoperability Communications. TOP-002 allowed the TOP to communicate what the line identifiers were via a list and use during communications. The new requirement implies that the parties must agree upon the line identifiers and that agreement must be documented. ATC believes that the requirement should state that “mutual agreement” allows for multiple identifiers. We believe that this is needed in order to avoid the following issues.</p> <ol style="list-style-type: none"> 1) This clarification will avoid any need for arbitration or formal dispute resolution steps. 2) If the standard does not allow for this provision entities will be forced to deviate from their own line naming convention and will result in entities to modify their drawings, field signs, and SCADA systems.
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT agrees that mutual agreement is not necessary so long as the identifiers are pre-determined, unique and used during Operating Communications. The second draft of the standard requires that, when referring to a Transmission interface Element/Facility, entities must use the name specified by the owner(s) of that Element /Facility.</p>		
MRO NERC Standards Review Subcommittee	Disagree	<p>TOP-002 R18 states that BA, TOP, GOP TSP and LSE shall use uniform line identifiers when referring to transmission facilities of an interconnected network. COM-003 R7 states that each RC, BA, TO, TOP, GOP, TSP, LSE and DP shall use pre-determined, mutually agreed upon line and equipment identifiers for verbal and written Interoperability Communications. TOP-002 allowed the TOP to communicate what the line identifiers were via a list and use during communications. The new requirement implies that the parties must agree upon the line identifiers and that agreement must be documented.</p> <p>We believe the requirement should require the exchange of line identifies but not impose that they be mutually agreed upon. This requirement represents a “how” and not a “what”. In general, standards should be focused on “what” not how.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT agrees that mutual agreement is not necessary so long as the identifiers are pre-determined, unique and used during Operating Communications. The second draft of the standard requires that, when referring to a Transmission interface Element/Facility, entities must use the name specified by the owner(s) of that Element /Facility.</p> <p>The OPCP SDT was chartered to develop Communication Protocols for Operating Personnel. The SDT proposes that the second draft of the</p>		

Organization	Yes or No	Question 2 Comment
<p>standard is more focused on “what” protocols to use in specific situations. In addition to three-part communication, the SDT believes the Standard should address other protocols that prevent miscommunication.</p>		
<p>Great River Energy</p>	<p>Disagree</p>	<p>TOP-002_R18 is fundamentally different from the new proposed requirement in COM-003-1_R7. TOP-002 R18 states that the BA, TOP, GOP TSP and LSE shall use uniform line identifiers when referring to transmission facilities of an interconnected network. COM-003-1_R7 states that each RC, BA, TO, TOP, GOP, TSP, LSE and DP shall use PRE-DETERMINED, MUTUALLY AGREED UPON line and equipment identifiers for verbal and written Interoperability Communications. GRE believes the TOP-002_R18 could be included in COM-003-1 but included as stated verbatim in TOP-002.</p>
<p>Response: The SDT thanks you for your comments and recommendation. The drafting team working on revisions to TOP-002-2a has recommended retiring R18. The OPCP team believes communications between entities would be improved when use of pre-determined identifiers is required for interface Elements and Facilities. The SDT proposes the concept of R7 being retained and transferred to R1 Part 1.1.4. The SDT agrees that mutual agreement is not necessary so long as the identifiers are pre-determined, unique and used during Operating Communications. The second draft of the standard requires that, when referring to a Transmission interface Element/Facility, entities must use the name specified by the owner(s) of that Element /Facility.</p>		
<p>Entergy Services</p>	<p>Disagree</p>	<p>TSP and LSE are not typically included in real-time communications and should not be included in this requirement. The intent this requirement in TOP-002-2 pertained to communications between neighboring BAs and TOPs. Adding LSE and TSP to this requirement doesn’t make sense, and this change should not be made.</p>
<p>Response: The SDT thanks you for your comments. The SDT reviewed the SAR, agrees with your comment and has removed TSPs and LSEs as applicable entities.</p>		
<p>SERC OC&SOS Standards Review Group</p>	<p>Disagree</p>	<p>TSPs and LSEs are not typically included in real-time communications and should not be included in COM-003-1. The intent of requirement R18 in TOP-002-2 pertained to communications between neighboring BAs and TOPs. Adding LSEs and TSPs to the applicability of this standard doesn’t make sense, and this change should not be made.</p>
<p>Response: The SDT thanks you for your comments. The SDT reviewed the SAR, agrees with your comment and has removed TSPs and LSEs as applicable entities.</p>		
<p>Duke Energy</p>	<p>Disagree</p>	<p>We disagree with moving R18 into COM-003-1 and broadening it to include every line and piece of equipment. This would create an enormous amount of effort to implement, and would substantially increase compliance risk,</p>

Organization	Yes or No	Question 2 Comment
		without any increase in reliability. Furthermore, if R18 is moved into COM-003-1, when would it be removed from TOP-002-2? Until R18 is actually removed from TOP-002-2, entities would be subject to compliance double jeopardy.
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT appreciates the comment in regard to the use of the word “equipment”. The SDT agrees and has modified Requirement R7 to only apply to interface Elements/Facilities.</p> <p>The drafting team working on revisions to TOP-002-2a has recommended retiring R18. The OPCP team believes communications between entities would be improved when use of pre-determined identifiers is required for interface Elements and Facilities. The SDT proposes the concept of R7 being retained and transferred to R1 Part 1.1.4.</p>		
NRECA RTF Members	Agree	Yes, we believe that the use of pre-determined, mutually agreed upon line and equipment identifiers for verbal and written Interoperability Communications enhances the reliable operation of the BES.
<p>Response: The SDT thanks you for your comments.</p>		

3. Requirement R1 of the draft COM-003-1 states, “Each Reliability Coordinator, Balancing Authority, Transmission Owner, Transmission Operator, Generator Operator, Transmission Service Provider, Load Serving Entity and Distribution Provider shall develop a written Communications Protocol Operating Procedure (CPOP) for Interoperability Communications among personnel responsible for Real-time generation control and Real-time operation of the interconnected Bulk Electric System. The CPOP shall include but is not limited to all elements described in Requirements R2 through R7 to ensure effective Interoperability Communications.” Do you agree with this proposal? If not, please explain in the comment area.

Summary Consideration:

The majority of the commenters indicated a Communications Protocol Operating Procedure (CPOP) would be administrative in nature and would not satisfy the criterion of enhancing the reliable operation of the BES.

The SDT agrees that a CPOP is administrative in nature, and does not satisfy the criteria of enhancing the reliable operation of the BES. The SDT has removed it from the proposed standard.

The SDT also removed TSPs and LSEs from the list of applicable entities because they were not named in the SAR. DPs have been maintained as applicable entities in the standard, as they were named in the SAR and perform activities impacting the BES.

Organization	Yes or No	Question 3 Comment
Bureau of Reclamation	Agree	
NIPSCO	Agree	
Oncor Electric Delivery	Agree	
PacifiCorp	Agree	
PEF	Agree	
South Carolina Electric and Gas	Agree	
Sunflower Electric Power Corp.	Agree	

Organization	Yes or No	Question 3 Comment
Western Area Power Administration	Agree	
ATC and ITC	Disagree	: Based upon the concerns that we have with R2-R7 we would not support this requirement. We would support the requirement if it stopped after the first sentence and then merely listed the minimum requirements that should be included in the Procedure such as; (1) time zone, (2) language spoken, (3) when phonetic alphabet will be used, etc.. This will allow the Entities to draft their own CPOP per the intent of the requirement and avoid the concerns that we have documented for the remainder of the requirements.
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute to reliability. The SDT agrees, and has deleted the requirement for a CPOP.</p>		
Progress Energy Carolina, Inc	Disagree	A requirement to create a CPOP and mandating absolute adherence to that CPOP is overly prescriptive, may not improve reliability of BES operations, and may serve to delay communications and therefore delay actions necessary to respond to threats to the reliability of the BES.
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute to reliability. The SDT agrees, and has deleted the requirement for a CPOP.</p>		
American Municipal Power	Disagree	A written CPOP will place an unnecessary burden on smaller entities without an increase in reliable communications. I feel that the other requirements are somewhat self-explanatory and that an annual review of the phonetics and three-part communications would improve reliability more than having a written CPOP requirement.
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute to reliability. The SDT agrees, and has deleted the requirement for a CPOP.</p>		
Puget Sound Energy	Disagree	<p>As discussed in Question 2, further consideration should be given to whether it is appropriate to include all the listed entities in this requirement.</p> <p>Additionally, the phrase “is not limited to” should be removed from the last sentence of the proposed requirement. The standard should specifically spell out what should be included in the CPOP. This phrase would lead to confusion about what an entity must include in the CPOP and is likely to result in inconsistent enforcement of the requirement.</p> <p>Also R1 appears to require a CPOP that will be used by personnel responsible for Real-time generation control</p>

Organization	Yes or No	Question 3 Comment
		<p>and Real-time operation of the interconnected Bulk Electric System. It is unclear if this specificity in who has to follow this extends to R2-R7 as well (while as noted the CPOP has to include elements of R2-R7). Without that clarity, the aspects of R2-R7 could seem to extend to communication between non-critical personnel regarding non-critical information.</p> <p>In addition, it appears that each of these entities must develop their own CPOP with clarity how the protocol gets vetted so that it is effectively employed across the entities. Finally, when reviewing the Functional Model document and its discussion of tasks and relationships to other entities, it is unclear why the TO is included in the applicability as they perform no real-time functions and provide no real time information.</p>
<p>Response: The SDT thanks you for your comments. The SDT did remove the TSP and LSE from the second draft of the standard. Many of the comments we received pointed out that having a CPOP does not directly contribute to reliability. The SDT agrees, and has deleted the requirement for a CPOP.</p>		
<p>British Columbia Transmission Corporation</p>	<p>Disagree</p>	<p>BCTC agrees with R1, R2, R3, R5 and R7 but strongly objects to R4 and R6.</p> <p>As a majority of the Interoperability Communications is within our time zone there is no advantage in using Central Standard Time as this will only make the communications more difficult as both parties are required to change time, R4 is unreasonable.</p> <p>R6 requiring the use of North American Treaty Organization (NATO) phonetic alphabet adds no value and will only cause confusion presently an instruction would be issued as: "At Kelly Lake open 5CB4" R6 it will now become "At Kelly Lake open Fife Charlie Bravo Fow-er"</p>
<p>Response: The SDT thanks you for your comments. Since the comments made by BCTC are directed specifically to requirements R4 and R6, the SDT responses to BCTC are covered in the responses to the relevant section for those requirements. You are correct, based on the requirement to use a phonetic alphabet, an operator that might normally say "At Kelly Lake open 5CB4" will now be required to say something similar to "At Kelly Lake open Fife Charlie Bravo Fow-er." This is intended to ensure that the recipient of the communication does not mistake the instruction for "At Kelly Lake open 5CP4." While "B" and "P" may sound similar, "Bravo" and "Papa" clearly do not.</p>		
<p>Bonneville Power Administration</p>	<p>Disagree</p>	<p>BPA does not agree with the one time zone or the NATO Standard. We believe the protocols are unnecessary and in fact will add more confusion to the process. We also do not agree, if this requires creating a brand new documented procedure just to address this standard, when elements are already covered in a different standard (common language in TOP).</p>
<p>Response: The SDT thanks you for your comments. Since the comments made by BPA are directed specifically to requirement R6, the SDT</p>		

Organization	Yes or No	Question 3 Comment
<p>responses to BPA are covered in the responses to the relevant requirements. Note that the SDT is proposing an alternative to R6.</p>		
<p>California Independent System Operator</p>	<p>Disagree</p>	<p>CAISO Comment; The requirement does not distinguish between intra and inter communications. Even though the proposed definition of “Interoperability Communications” is between two “entities”, how will an auditor interpret it? Will this be taken to the extreme and be required to address communications between two different functions within one organization? For example, between the generation desk and the scheduling desk? How important is this plan? This requirement has a low Violation Risk Factor while the individual requirements that makeup the plan have High Violation Risk Factors. Furthermore, the Violation Security Levels do not address failure to follow the protocol in the plan. Based on the VFR and VSL, it is easy to conclude this plan does little in supporting an adequate level of reliability.</p>
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute to reliability. The SDT agrees, and has deleted the requirement for a CPOP. Additionally, it should be noted that the SDT has removed the definition and any reference to “Interoperability Communications”.</p>		
<p>NorthWestern Energy</p>	<p>Disagree</p>	<p>COM-001 and COM-002 standards, along with Operator Training, adequately address this issue. Therefore there is no need for this additional requirement.</p>
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute to reliability. The SDT agrees, and has deleted the requirement for a CPOP.</p>		
<p>New York State Reliability Council</p>	<p>Disagree</p>	<p>Comments: NYSRC agrees with the need for CPOP but does not agree that R4 can or should apply to all interoperability communications between entities. Since the examples in Attachment 1 specifically state RC and TOP, this standard should not apply to any other entity except for the RC and TOP. COM-002-03(draft) could require the other entities to utilize three part communication for reliability-related Interoperability communication.</p>
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute to reliability. The SDT agrees, and has deleted the requirement for a CPOP. The concern stated by NYSRC regarding R4 is addressed in the SDT responses to question #5.</p>		
<p>Old Dominion Electric Cooperative</p>	<p>Disagree</p>	<p>Comments: We believe that it may be important for entities registered as a Reliability Coordinator, Balancing Authority, Transmission Owner, Transmission Operator, Generator Operator, Transmission Service Provider , Load Serving Entity and Distribution Provider to have a formalized Communications Protocol Operating Procedure (CPOP) for Interoperability Communications, but this requirement will place an unnecessary burden on the</p>

Organization	Yes or No	Question 3 Comment
		<p>personnel at many of the smaller Load Serving Entities and Distribution Providers on the NERC Compliance Registry. In most real-time scenarios, the BES facilities are not operated nor maintained by the Load Serving Entity or Distribution Provider. As with many standards, entities will be required to demonstrate why the standard/requirement is applicable. We suggest the drafting team consider modifying the applicability of this standard as follows similar to the format used in PRC-005:4. Applicability:</p> <ul style="list-style-type: none"> 4.1. Transmission Operator 4.2. Transmission Owner 4.3. Balancing Authority 4.4. Reliability Coordinator 4.5. Generator Operator 4.6. Distribution Provider that is responsible for Real-time generation control and Real-time operation of the interconnected Bulk Electric System 4.7. Transmission Service Provider 4.8. Load Serving Entity that is responsible for Real-time generation control and Real-time operation of the interconnected Bulk Electric System
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute to reliability. The SDT agrees, and has deleted the requirement for a CPOP. We did not include the LSE or TSP because they were not listed in the SAR but did include DPs in the standard as DPs carry out actions related to the reliability of the Bulk Electric System such as voltage reduction and load shedding.</p>		
<p>Tri-State Generation & Transmission Assoc.</p>	<p>Disagree</p>	<p>DP, LSE and TSP are not responsible for the reliability of the Bulk Electric System. Also, attachment 1 explains Operating State Alert Levels that defines colors that are already in use by the Department of Homeland Security. Re-using these colors presents confusion to the operators of the BES. This places an unnecessary additional burden on Real Time day-to-day operations with a high risk of confusion in an emergency.</p>
<p>Response: The SDT thanks you for your comments. The SDT appreciates the comments with regards to concerns related to including TSPs, DPs and LSEs. The SDT has removed the LSE and TSP functions from the applicability of the current draft of the standard, which is consistent with the SAR. However, the SDT believes that DPs carry out actions related to the reliability of the Bulk Electric System such as voltage reduction and load shedding. Several existing standards contain requirements concerning operating communications that DPs must presently comply with that would be governed by the protocols of COM -003-1. It should be noted that the requirements of the second draft of COM-003-1 are only applicable to</p>		

Organization	Yes or No	Question 3 Comment
<p>Operating Communications. To the extent that these entities do not take actions that change or maintain the state, status, output, or input of an Element or Facility of the Bulk Electric System, COM-003-1 would not apply.</p> <p>The SDT refers Tri-State Generation & Transmission Assoc. to response to Question 9 to see responses showing changes proposed on Attachment 1 of COM-003.</p>		
<p>Pacific Northwest Small Utilities Comment Group</p>	<p>Disagree</p>	<p>DPs and LSEs are in general users, not owners or operators of interconnected BES equipment per the registry criteria. DPs and LSEs should be removed from this requirement since LSEs typically do not own or operate the interconnected BES equipment</p>
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute to reliability. The SDT agrees, and has deleted the requirement for a CPOP.</p> <p>The SDT reviewed the SAR and has removed TSPs and LSEs as applicable entities; however DPs were included as applicable entities and have been retained in COM-003-1. The specified role of the DP to shed load justifies the retention of the DP as an applicable entity.</p>		
<p>Transmission Owner</p>	<p>Disagree</p>	<p>FPL agrees with the reliability goal of establishing a set of agreed upon communication standards to ensure consistent communications particularly for actual and anticipated emergency coordination needs. FPL also believes that existing coordination/communication standards already fulfill this objective and that it might be of “training” or “reference” value to aggregate those requirements to a single document or view. However, FPL is not convinced that this requirement, largely administrative in nature, will result in marked improvement in reliability. Organizations tend to take the path of least resistance and unless forced out of that path with extensive and granular guidance on what CPOPs should contain above and beyond existing standards or contract language, CPOPs would likely become a simple patchwork of requirements constructed out of existing NERC standard language and contract language. Standards need to be clearly implementable before they are approved yet important implementation questions do not appear to have been answered.</p> <p>(1) What if parties cannot reach agreement?</p> <p>(2) Is it enough to have attempted to coordinate?</p> <p>(3) What if parties already have agreed upon procedures such as NPIRs, or those stated in Interconnection Agreements - do they take precedent or must they be redesigned/relegated?</p> <p>(4) What if CPOPs differ greatly across interconnections because of differing parties? (One might conclude that by formalizing these different practices, as opposed to mandating standard practices, the goal of more reliable coordination may not have been achieved)</p>

Organization	Yes or No	Question 3 Comment
		<p>(5) What level of evidence constitutes “agreement” especially in circumstances where entities may be remiss to agree?</p> <p>(6) What if CPOPs are simply a patchwork of requirements constructed out of existing NERC standard language and contract language - does that achieve the CPOP goal?</p>
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute to reliability. The SDT agrees, and has deleted the requirement for a CPOP.</p>		
Consumers Energy	Disagree	<p>I agree written Communication Protocols should be in place. Since we do not agree with all of the requirements mentioned we cannot agree with this statement. Furthermore, since these protocols will have to be between Functional Entities and most likely multiple companies, a methodology needs to be in place to prevent duplication of efforts and double jeopardy in the audit process.</p>
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute to reliability. The SDT agrees, and has deleted the requirement for a CPOP.</p>		
Florida Municipal Power Agency (FMPA) and some members	Disagree	<p>If one of the goals is consistent communications, why would the standard require each Entity to develop a separate CPOP? For consistency, shouldn't the Reliability Coordinator develop the CPOP (with input from the other Entities) and all other Entities within the RC's area adopt it?</p>
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute to reliability. The SDT agrees, and has deleted the requirement for a CPOP.</p>		
Entergy Services	Disagree	<p>Interoperability communications should be removed as recommended in our response to question 1. Creating requirements for the communications protocol will by necessity require entities to document how they meet the requirements. A requirement for an operating procedure is redundant. The requirement to have an operating procedure in effect makes this a “how” requirement. An entity could choose to have more than one procedure that described their communications protocol. This requirement as written could force an entity to put all of their communications procedures into one CPOP, which doesn't improve reliability. Therefore the requirement is not needed and should not be included in the standard.</p>
<p>Response: The SDT thanks you for your comments. “Interoperability Communications” has been removed because it appeared to be ambiguous and unclear.</p>		

Organization	Yes or No	Question 3 Comment
<p>Many of the comments we received pointed out that having a CPOP does not directly contribute to reliability. The SDT agrees, and has deleted the requirement for a CPOP.</p>		
We Energies	Disagree	<p>It is not clear what the purpose of the CPOP is, or how having it would improve reliability of the Bulk Electric System. This standard, (or alternatively COM-002-003) should focus on requiring Three-Part Communication during Reliability Directives. In addition, the vague and broad nature of the existing definition of Interoperability Communication makes creating CPOP’s problematic and open to conflict with the CPOP’s developed independently by other entities. As noted in question 2, R1 should not apply to a TSP or LSE.</p>
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute to reliability. The SDT agrees, and has deleted the requirement for a CPOP. The SDT reviewed the SAR and has removed TSPs and LSEs as applicable entities.</p>		
Independent Electricity System Operator	Disagree	<p>It is not clear what the purpose of this communication protocol is or what should even be included in the protocol. This standard only needs to focus on requiring three-part communications during actual and anticipated emergency conditions without inclusion of the elements to be communicated as they cover a wide range of conditions which can vary among the communicating parties.</p>
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute to reliability. The SDT agrees, and has deleted the requirement for a CPOP.</p>		
IRC Standards Review Committee	Disagree	<p>It is not clear what the purpose of this communication protocol is or what should even be included in the protocol. This standard only needs to focus on requiring three-part communications during actual and anticipated emergency conditions. The NERC BOT has approved pursuing the Performance-based Reliability Standard Task Force’s recommendations to assess the existing standards, modify and develop standards that support reliability performance and risk management, and work on an overall plan to transition existing standards to a new set of standards. One goal of this effort is to delineate actionable reliability requirements from record/documentation requirements.</p> <p>This proposal takes the opposite approach and incorporates a new administrative requirement. We - and the industry as a whole based on the response to the Task Force - do not support such an approach. We suggest deleting this Requirement from the Standard.</p> <p>Furthermore, the establishment of R2-R7 as elements of the CPOP required in R1 appears to contradict the recent</p>

Organization	Yes or No	Question 3 Comment
		<p>shift in direction that NERC has taken regarding defining criteria as bullets under a requirement. See NERC’s August 10th informational filing regarding assignment of violation risk factors and violation severity levels in regards to dockets RM08-11-000, RR08-4-000, RR07-9-000, and RR07-10-000.COM-003 R2 states: “shall use pre-defined system condition terminology as defined in Attachment 1-COM-003-1 for verbal and written Interoperability Communications.” Why does R1 establish the requirement for a procedure, when the procedure is essentially defined by R2-R7. If there is such reliability need to establish these requirements, one could conclude nothing else is so important that it needs to be included because it is not identified in the standard. Furthermore, R2 appears to define Interoperability Communications for attachment 1 communications only. Is this the intent of the drafting team?</p>
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute to reliability. The SDT agrees, and has deleted the requirement for a CPOP.</p>		
<p>ISO New England Inc.</p>	<p>Disagree</p>	<p>It is not clear what the purpose of this communication protocol is or what should even be included in the protocol. This standard only needs to focus on requiring three-part communications during actual and anticipated emergency conditions. The NERC BOT has approved pursuing the Performance-based Reliability Standard Task Force’s recommendations to assess the existing standards, modify and develop standards that support reliability performance and risk management, and work on an overall plan to transition existing standards to a new set of standards. One goal of this effort is to delineate actionable reliability requirements from record/documentation requirements. This proposal takes the opposite approach and incorporates a new administrative requirement. We - and the industry as a whole based on the response to the Task Force - do not support such an approach. We suggest deleting this Requirement from the Standard. Furthermore, the establishment of R2-R7 as elements of the CPOP required in R1 appears to contradict the recent shift in direction that NERC has taken regarding defining criteria as bullets under a requirement. See NERC’s August 10th informational filing regarding assignment of violation risk factors and violation severity levels in regards to dockets RM08-11-000, RR08-4-000, RR07-9-000, and RR07-10-000.COM-003 R2 states: “shall use pre-defined system condition terminology as defined in Attachment 1-COM-003-1 for verbal and written Interoperability Communications.” Why does R1 establish the requirement for a procedure, when the procedure is essentially defined by R2-R7. If there is such a reliability need to establish these requirements, one could conclude nothing else is so important that it needs to be included because it is not identified in the standard. Furthermore, R2 appears to define Interoperability Communications for attachment 1 communications only. Is this the intent of the drafting team?</p>

Organization	Yes or No	Question 3 Comment
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute to reliability. The SDT agrees, and has deleted the requirement for a CPOP.</p>		
National Grid	Disagree	<p>It is not clear what the purpose of this communication protocol is or what should even be included in the protocol. This standard only needs to focus on requiring three-part communications during actual and anticipated emergency conditions.</p>
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute to reliability. The SDT agrees, and has deleted the requirement for a CPOP.</p>		
PJM	Disagree	<p>It is not clear what the purpose of this communication protocol is or what should even be included in the protocol. This standard only needs to focus on requiring three-part communications during actual and anticipated emergency conditions. We feel that there should not be a requirement in the standard to have a “procedure”. It is our understanding that, to be auditably compliant with a standard, the responsible entity must develop a procedure, train on that procedure, and be able to demonstrate compliance via documents, data, logs, records, etc. If Requirements R2 - R7 are included in this standard, the entity will need to develop a procedure to be compliant. In other words, the procedure itself will become the focus rather than the actual communications protocol. Therefore, we feel that requirement R1 is redundant and should not be included. The NERC BOT has approved pursuing the Performance-based Reliability Standard Task Force’s recommendations to assess the existing standards, modify and develop standards that support reliability performance and risk management, and work on an overall plan to transition existing standards to a new set of standards. One goal of this effort is to delineate actionable reliability requirements from record/documentation requirements. This proposal takes the opposite approach and incorporates a new administrative requirement. We - and the industry as a whole based on the response to the Task Force - do not support such an approach. We suggest deleting this Requirement from the Standard. Furthermore, the establishment of R2-R7 as elements of the CPOP required in R1 appears to contradict the recent shift in direction that NERC has taken regarding defining criteria as bullets under a requirement. See NERC’s August 10th informational filing regarding assignment of violation risk factors and violation severity levels in regards to dockets RM08-11-000, RR08-4-000, RR07-9-000, and RR07-10-000. Furthermore, R2 appears to define Interoperability Communications for attachment 1 communications only. Is this the intent of the drafting team?</p>
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute to reliability. The SDT agrees, and has deleted the requirement for a CPOP.</p>		

Organization	Yes or No	Question 3 Comment
PJM SOS Comments	Disagree	<p>It is not clear what the purpose of this communication protocol is or what should even be included in the protocol. This standard only needs to focus on requiring three-part communications during actual and anticipated emergency conditions. We feel that there should not be a requirement in the standard to have a “procedure”. It is our understanding that, to be auditably compliant with a standard, the responsible entity must develop a procedure, train on that procedure, and be able to demonstrate compliance via documents, data, logs, records, etc. If Requirements R2 - R7 are included in this standard, the entity will need to develop a procedure to be compliant. In other words, the procedure itself will become the focus rather than the actual communications protocol. Therefore, we feel that requirement R1 is redundant and should not be included. The NERC BOT has approved pursuing the Performance-based Reliability Standard Task Force’s recommendations to assess the existing standards, modify and develop standards that support reliability performance and risk management, and work on an overall plan to transition existing standards to a new set of standards. One goal of this effort is to delineate actionable reliability requirements from record/documentation requirements. This proposal takes the opposite approach and incorporates a new administrative requirement. We - and the industry as a whole based on the response to the Task Force - do not support such an approach. We suggest deleting this Requirement from the Standard. Furthermore, the establishment of R2-R7 as elements of the CPOP required in R1 appears to contradict the recent shift in direction that NERC has taken regarding defining criteria as bullets under a requirement. See NERC’s August 10th informational filing regarding assignment of violation risk factors and violation severity levels in regards to dockets RM08-11-000, RR08-4-000, RR07-9-000, and RR07-10-000. Furthermore, R2 appears to define Interoperability Communications for attachment 1 communications only. Is this the intent of the drafting team?</p>
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute to reliability. The SDT agrees, and has deleted the requirement for a CPOP.</p>		
NYSEG	Disagree	<p>It is not clear when the Interoperability Communication is required to be used. Is it only for communications between registered entities (inter) or internal to a registered entity (intra)? And is it required for all communications or used only in certain circumstances (i.e. emergency (if emergency, it needs to be defined what constitutes an emergency))?</p>
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute to reliability. The SDT agrees, and has deleted the requirement for a CPOP.</p>		
PowerSouth Energy	Disagree	<p>It's not clear as to who is being targeted as the "personnel responsible for real-time generation control and real-</p>

Organization	Yes or No	Question 3 Comment
		time operation of the BES". Is this just the system operator or is this the generator unit operator or the field switchman?
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute to reliability. The SDT agrees, and has deleted the requirement for a CPOP.</p> <p>The person responsible may be any individual from an Applicable Entity who sends or receives an operating communication changing the state or status of the BES. Note that in the second draft of this standard, the phrase, "personnel responsible for real-time generation control and real-time operation of the BES" is not used.</p>		
Long Island Power Authority	Disagree	LIPA agrees with the need for CPOP but does not agree that R4 can or should apply to all interoperability communications between entities. Since the examples in Attachment 1 specifically state RC and TOP, this standard should not apply to any other entity except for the RC and TOP. COM-002-03(draft) could require the other entities to utilize three part communication for reliability-related Interoperability communication.
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute to reliability. The SDT agrees, and has deleted the requirement for a CPOP.</p>		
City Of Greenfield	Disagree	Listed as an LSE & DP, we are a small municipal utility that does not own nor operate any generation or transmission equipment. Therefore this standard is not applicable to our facility. Keep in mind, not all LSE's & DP's operate generation or transmission equipment. There are several small utilities that this standard would not be applicable to. LSE's & DP's should be put into class sizes depending on the size of the company or utility. Example: Class #1 LSE & DP : Companies that own & operate generation & transmission Class #2 LSE & DP : Companies that do not own or operate generation & transmission.(municipals,co-ops,etc)
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute to reliability. The SDT agrees, and has deleted the requirement for a CPOP.</p> <p>The SDT reviewed the SAR and has removed TSPs and LSEs as applicable entities; however DPs were included as applicable entities and have been retained in COM-003-1. The specified role of the DP to shed load justifies the retention of the DP as an applicable Entity.</p>		
NERC Staff	Disagree	NERC staff recommends that Requirement R1 be deleted because it is strictly an administrative requirement that is not necessary. It is not results-based, and is redundant given the imbedded reference to Requirements R2 to R7. If an entity can demonstrate compliance with the other requirements, Requirement R1 performs no additional reliability enhancement. A Requirement should state a performance outcome or a risk to be mitigated. If there is a need to document something, the appropriate location for that is in the Measures section of the

Organization	Yes or No	Question 3 Comment
		<p>standard. A distinction should be made here that producing a document containing specific content necessary for reliability, such as a system restoration procedure, can be an effective requirement used to minimize risk. However, documentation that does not stand on its own as a result necessary for reliability should not be made into a requirement. Such documentation requirements should either be eliminated or moved to an administrative, informational section of the standards. An example of a weak requirement is “the Responsible Entity shall document the implementation of security patches”. The requirement that directly contributes to a risk reduction outcome is to implement applicable cyber security patches. Documentation of the implementation is simply a vehicle for demonstrating compliance. The NERC staff does not find that the CPOP satisfies the criterion of reducing risk.</p>
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute to reliability. The SDT agrees, and has deleted the requirement for a CPOP.</p>		
<p>NextEra Energy Resources, LLC</p>	<p>Disagree</p>	<p>NextEra agrees with the reliability goal of establishing a set of agreed upon communication standards to ensure consistent communications particularly for actual and anticipated emergency coordination needs. NextEra believes that existing coordination/communication standards already fulfill this objective and that it might be of “training” or “reference” value to aggregate those requirements to a single document or view. However, NextEra is not convinced that this requirement, largely administrative in nature, will result in marked improvement in reliability. Organizations tend to take the path of least resistance and unless forced out of that path with extensive and granular guidance on what CPOPs should contain above and beyond existing standards or contract language, CPOPs would likely become a simple patchwork of requirements constructed out of existing NERC standard language and contract language. Standards need to be clearly implementable before they are approved yet important implementation questions do not appear to have been answered. (1) What if parties cannot reach agreement? (2) Is it enough to have attempted to coordinate? (3) What if parties already have agreed upon procedures such as NPIRs, or those stated in Interconnection Agreements - do they take precedent or must they be redesigned/relegated? (4) What if CPOPs differ greatly across interconnections because of differing parties? (One might conclude that by formalizing these different practices, as opposed to mandating standard practices, the goal of more reliable coordination may not have been achieved) (5) What level of evidence constitutes “agreement” especially in circumstances where entities may be remiss to agree? (6) What if CPOPs are simply a patchwork of requirements constructed out of existing NERC standard language and contract language - does that achieve the CPOP goal?</p>
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute</p>		

Organization	Yes or No	Question 3 Comment
<p>to reliability. The SDT agrees, and has deleted the requirement for a CPOP.</p>		
<p>Pepco Holdings, Inc. - Affiliates</p>	<p>Disagree</p>	<p>PHI agrees that communications procedures are necessary. We do not see the need to create a CPOP that includes requirements R2 through R7 given that each requirement defines how and what is to be communicated. This requirement as written could force entities to incorporate all of their communication procedures into a CPOP which will not improve reliability.</p>
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute to reliability. The SDT agrees, and has deleted the requirement for a CPOP.</p>		
<p>Orange and Rockland Utilities, Inc.</p>	<p>Disagree</p>	<p>R4 - Use of the CST time format would present challenges affecting hardware, software, and training in the ECC and is counter to practices of scheduling, switching execution, and time-stamping of activities currently executed by the ECC. A more defined definition of “Interoperability Communications” needs to be instituted in conjunction with R4 applicability.</p>
<p>Response: See the responses under question #5 which addresses R4. The SDT has eliminated the term “Interoperability Communications”</p>		
<p>E.ON U.S. LLC</p>	<p>Disagree</p>	<p>Requiring production of a document that merely repeats Requirement 2-7 of COM-003 does not further BES reliability. Requirements R2-R7 set forth all that such a document would contain. Stating that the CPOP should include but not be limited to R2-R7 is nonsensical. What additional issues should the CPOP be required to address and why aren’t those issues the subject of a COM-003 requirement?</p>
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute to reliability. The SDT agrees, and has deleted the requirement for a CPOP.</p>		
<p>Southern Company Transmission</p>	<p>Disagree</p>	<p>Southern Company supports the SERC SOS comments. SERC SOS comments: This group feels that there should not be a requirement in the standard to have a “procedure”. It is our understanding that, to be auditably compliant with a standard, the responsible entity must develop a procedure, train on that procedure, and be able to demonstrate compliance via documents, data, logs, records, etc. If Requirements R2 - R7 are included in this standard, the entity will need to develop a procedure to be compliant. Therefore, we feel that requirement R1 is redundant and should not be included. Southern company comments: The VSF for not having a written procedure is Severe. If an entity does not have a written procedure but complies with the other requirements in this standard has the reliability of the Bulk Electric System been affected? If the reliability of the Bulk Electric System is not affected by not having a written</p>

Organization	Yes or No	Question 3 Comment
		procedure why is this requirement in a Reliability Standard?
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute to reliability. The SDT agrees, and has deleted the requirement for a CPOP.</p>		
Great River Energy	Disagree	<p>The NERC BOT has approved pursuing the Performance-based Reliability Standard Task Force’s recommendations to assess the existing standards, modify and develop standards that support reliability performance and risk management, and work on an overall plan to transition existing standards to a new set of standards. One goal of this effort is to eliminate administrative requirements. This proposal takes the opposite approach and incorporates a new administrative requirement. GRE does not support such an approach. GRE suggests deleting this Requirement from the Standard.</p>
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute to reliability. The SDT agrees, and has deleted the requirement for a CPOP.</p>		
PSEG Companies	Disagree	<p>The PSEG Companies agree with the concerns expressed in the comments filed by the PJM System Operations Subcommittee (SOS) Group.</p>
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute to reliability. The SDT agrees, and has deleted the requirement for a CPOP.</p>		
Duke Energy	Disagree	<p>There is no need to have a CPOP to describe how an entity will comply with R2 through R7. A CPOP would just be a restatement of the requirements. If an entity complies with R2 through R7, there’s no reliability related benefit to having a CPOP.</p>
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute to reliability. The SDT agrees, and has deleted the requirement for a CPOP.</p>		
ERCOT ISO	Disagree	<p>This approach of an administrative type requirement is in conflict with the NERC BOT approval of pursuing the development of standards to support reliability performance and eliminate administrative requirements. It is not necessary to have a separate CPOP document to insure operating personnel communicate effectively.</p>
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute to reliability. The SDT agrees, and has deleted the requirement for a CPOP.</p>		
SERC OC&SOS	Disagree	<p>This group feels that there should not be a requirement in the standard to have a “procedure”. It is our</p>

Organization	Yes or No	Question 3 Comment
Standards Review Group		understanding that, to be auditably compliant with a standard, the responsible entity must develop a procedure, train on that procedure, and be able to demonstrate compliance via documents, data, logs, records, etc. If Requirements R2 - R7 are included in this standard, the entity will need to develop a procedure to be compliant. Therefore, we feel that requirement R1 is redundant and should not be included.
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute to reliability. The SDT agrees, and has deleted the requirement for a CPOP.</p>		
Ameren	Disagree	This is a near fill-in-the-blank requirement. The mere inclusion, or recitation, of the R2-7 elements does not assure a meaningful plan. It is easy to say “Our plans includes R3”. That does not assure reliable communications. This requirement should describe a functional CPOP.
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute to reliability. The SDT agrees, and has deleted the requirement for a CPOP.</p>		
Georgia Transmission Corp	Disagree	This is a requirement for an operating procedure which is redundant and would require the entities to document how they met the requirement.
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute to reliability. The SDT agrees, and has deleted the requirement for a CPOP.</p>		
Dynergy	Disagree	<p>This proposed communication protocol is redundant to Requirements R2-R7 and should not be included in this Standard. This standard only needs to focus on requiring three-part communications during actual and anticipated emergency conditions.</p> <p>The NERC BOT has approved pursuing the Performance-based Reliability Standard Task Force’s recommendations to assess the existing standards, modify and develop standards that support reliability performance and risk management, and work on an overall plan to transition existing standards to a new set of standards. One goal of this effort is to eliminate administrative requirements. This proposed Requirement takes the opposite approach and incorporates a new administrative requirement. We - and the industry as a whole based on the response to the Task Force - do not support such an approach. We suggest deleting this Requirement from the Standard.</p>
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute to reliability. The SDT agrees, and has deleted the requirement for a CPOP.</p>		
Hydro-Québec	Disagree	This proposed communication protocol is redundant to Requirements R2-R7, and should not be included in this

Organization	Yes or No	Question 3 Comment
TransEnergie		<p>Standard. This standard only needs to focus on requiring three-part communications during actual and anticipated emergency conditions for all entities involved in real time operations. The NERC BOT has approved pursuing the Results-based Reliability Standard Task Force’s recommendations to assess the existing standards, modify and develop standards that support reliability performance and risk management, and work on an overall plan to transition existing standards to a new set of standards. One goal of this effort is to eliminate administrative requirements. This proposal takes the opposite approach and incorporates a new administrative requirement. The industry as a whole, based on the response to the Task Force, does not support such an approach. This Requirement should be deleted from the Standard. There is no need to create a CPOP that includes requirements R2 through R7 given that each requirement spells out how and what is to be communicated. A CPOP may be needed for Interoperability Communications that are not addressed in R2-7.</p>
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute to reliability. The SDT agrees, and has deleted the requirement for a CPOP.</p>		
Kansas City Power & Light	Disagree	<p>This proposed communication protocol is redundant to Requirements R2-R7 and should not be included in this Standard. This standard only needs to focus on requiring three-part communications during actual and anticipated emergency conditions and using agreed upon terminology for switching equipment for bulk electric system.</p>
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute to reliability. The SDT agrees, and has deleted the requirement for a CPOP.</p>		
Midwest ISO Standards Collaborators	Disagree	<p>This proposed communication protocol is redundant to Requirements R2-R7 and should not be included in this Standard. This standard only needs to focus on requiring three-part communications during actual and anticipated emergency conditions. The NERC BOT has approved pursuing the Performance-based Reliability Standard Task Force’s recommendations to assess the existing standards, modify and develop standards that support reliability performance and risk management, and work on an overall plan to transition existing standards to a new set of standards. One goal of this effort is to eliminate administrative requirements. This proposal takes the opposite approach and incorporates a new administrative requirement. We - and the industry as a whole based on the response to the Task Force - do not support such an approach. We suggest deleting this Requirement from the Standard.</p>
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute</p>		

Organization	Yes or No	Question 3 Comment
<p>to reliability. The SDT agrees, and has deleted the requirement for a CPOP.</p>		
<p>Northeast Power Coordinating Council</p>	<p>Disagree</p>	<p>This proposed communication protocol is redundant to Requirements R2-R7, and should not be included in this Standard. This standard only needs to focus on requiring three-part communications during actual and anticipated emergency conditions. The NERC BOT has approved pursuing the Results-based Reliability Standard Task Force’s recommendations to assess the existing standards, modify and develop standards that support reliability performance and risk management, and work on an overall plan to transition existing standards to a new set of standards. One goal of this effort is to eliminate administrative requirements. This proposal takes the opposite approach and incorporates a new administrative requirement. The industry as a whole, based on the response to the Task Force, does not support such an approach. This Requirement should be deleted from the Standard. There is no need to create a CPOP that includes requirements R2 through R7 given that each requirement spells out how and what is to be communicated. A CPOP may be needed for Interoperability Communications that are not addressed in R2-7.</p>
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute to reliability. The SDT agrees, and has deleted the requirement for a CPOP.</p>		
<p>Northeast Utilities</p>	<p>Disagree</p>	<p>This proposed communication protocol is redundant to Requirements R2-R7, and should not be included in this Standard. This standard only needs to focus on requiring three-part communications during actual and anticipated emergency conditions. The NERC BOT has approved pursuing the Results-based Reliability Standard Ad Hoc Working Group recommendations to assess the existing standards, modify and develop standards that support reliability performance and risk management, and work on an overall plan to transition existing standards to a new set of standards. One goal of this effort is to eliminate administrative requirements. This proposal takes the opposite approach and incorporates a new administrative requirement. The industry as a whole, based on the response to the Task Force, does not support such an approach. This Requirement should be deleted from the Standard.</p>
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute to reliability. The SDT agrees, and has deleted the requirement for a CPOP.</p>		
<p>Electric Market Policy</p>	<p>Disagree</p>	<p>We agree that communications procedures are necessary, but we do not agree with several of the requirements proposed to be addressed in the elements of the CPOP. See our comments on specific requirements elsewhere in our responses.</p>

Organization	Yes or No	Question 3 Comment
		We do not see the need to create a CPOP that includes requirements R2 through R7 given that each requirement spells out how and what is to be communicated. We could agree that a CPOP may be needed for Interoperability Communications that are not addressed in R2-7.
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute to reliability. The SDT agrees, and has deleted the requirement for a CPOP.</p>		
Xcel Energy	Disagree	We agree with the structure of the standard, however we have issues with several of the CPOP elements being proposed. (See detail comments in following questions.)
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute to reliability. The SDT agrees, and has deleted the requirement for a CPOP.</p>		
Santee Cooper	Disagree	We believe that a company’s documentation demonstrating compliance for R2 through R7 would eliminate the need for a CPOP document.
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute to reliability. The SDT agrees, and has deleted the requirement for a CPOP.</p>		
Sunflower Electric Power Corporation	Disagree	We believe that distribution providers (electric cooperatives) should be removed from this standard unless they control a BES segment
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute to reliability. The SDT agrees, and has deleted the requirement for a CPOP.</p> <p>The SDT reviewed the SAR and has removed TSPs and LSEs as applicable entities; however DPs were included as applicable entities and have been retained in COM-003-1. The specified role of the DP to shed load justifies the retention of the DP as an applicable Entity subject to the DPs’ impact on Elements on the BES.</p>		
NRECA RTF Members	Disagree	We believe that it may be important for entities registered as a Reliability Coordinator, Balancing Authority, Transmission Owner, Transmission Operator, Generator Operator, Transmission Service Provider , Load Serving Entity and Distribution Provider to have a formalized Communications Protocol Operating Procedure (CPOP) for Interoperability Communications, but this requirement will place an unnecessary burden on the personnel at many of the smaller Load Serving Entities and Distribution Providers on the NERC Compliance Registry. In most real-time scenarios, the BES facilities are not operated nor maintained by the Load Serving Entity or Distribution Provider. As with many standards, entities will be required to demonstrate why the standard/requirement is

Organization	Yes or No	Question 3 Comment
		<p>applicable. We suggest the drafting team consider modifying the applicability of this standard as follows similar to the format used in PRC-005:</p> <p>4. Applicability:</p> <p>4.1. Transmission Operator</p> <p>4.2. Transmission Owner</p> <p>4.3. Balancing Authority</p> <p>4.4. Reliability Coordinator</p> <p>4.5. Generator Operator</p> <p>4.6. Distribution Provider that is responsible for Real-time generation control and Real-time operation of the interconnected Bulk Electric System</p> <p>4.7. Transmission Service Provider</p> <p>4.8. Load Serving Entity that is responsible for Real-time generation control and Real-time operation of the interconnected Bulk Electric System</p>
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute to reliability. The SDT agrees, and has deleted the requirement for a CPOP.</p> <p>The SDT reviewed the SAR and has removed TSPs and LSEs as applicable entities; however DPs were included as applicable entities and have been retained in COM-003-1. The specified role of the DP to shed load justifies the retention of the DP as an applicable Entity subject to the DPs’ impact on Elements on the BES.</p>		
Washington City Light & Power	Disagree	<p>We believe that it may be important for entities registered as a Reliability Coordinator, Balancing Authority, Transmission Owner, Transmission Operator, Generator Operator, Transmission Service Provider , Load Serving Entity and Distribution Provider to have a formalized Communications Protocol Operating Procedure (CPOP) for Interoperability Communications, but this requirement will place an unnecessary burden on the personnel at many of the smaller Load Serving Entities and Distribution Providers on the NERC Compliance Registry. In most real-time scenarios, the BES facilities are not operated nor maintained by the Load Serving Entity or Distribution Provider. As with many standards, entities will be required to demonstrate why the standard/requirement is applicable.</p>
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute</p>		

Organization	Yes or No	Question 3 Comment
<p>to reliability. The SDT agrees, and has deleted the requirement for a CPOP.</p> <p>The SDT reviewed the SAR and has removed TSPs and LSEs as applicable entities; however DPs were included as applicable entities and have been retained in COM-003-1. The specified role of the DP to shed load justifies the retention of the DP as an applicable Entity subject to the DPs’ impact on Elements on the BES.</p>		
Transmission System Operations	Disagree	We believe the phrase, “but is not limited to” should be deleted. The elements required to be in the CPOP should be well-defined.
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute to reliability. The SDT agrees, and has deleted the requirement for a CPOP.</p>		
FirstEnergy	Disagree	We feel that procedures are beneficial for entities to have as far as internal training of new personnel and as a reference guide for all personnel, but we do not agree that it should be a requirement of a reliability standard. It is not appropriate to subject an entity to monetary fines for not having a procedure even if that entity has fully complied with all the other requirements (R2 through R7) of this standard that the procedure is referencing. Although this requirement may fall into the category of best practices and administrative requirements, it certainly does not rise to the level of performance-based, risk-based, or competency-based requirements. The real evidence of an entity implementing R2 through R7 is by evaluating the measures of those requirements and a variety of information could be used by an entity such as training records, procedures, voice recordings etc. Having a procedure does not need to be a standalone requirement.
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute to reliability. The SDT agrees, and has deleted the requirement for a CPOP.</p>		
MRO NERC Standards Review Subcommittee	Disagree	We request that R1 be rewritten for real time operation of elements and facilities connected to the BES. Based upon the concerns that we have with Requirements R2-R7 we would not support this requirement. We would support requirement R1 if it stopped after the first sentence and then merely listed the minimum requirements that should be included in the Procedure such as; (1) time zone, (2) language spoken, (3) when phonetic alphabet will be used, etc.. This will allow the Entities to draft their own CPOP per the intent of the requirement and avoid the concerns that we have documented for the remainder of the requirements. Reliability Standards are supposed to describe “What” is required, not “How” compliance would be achieved. We believe this proposed Reliability Standard describes more the “How”, and is contrary to the Results Based Standards Initiative being implemented by NERC. The NERC BOT has approved pursuing the Performance-based Reliability

Organization	Yes or No	Question 3 Comment
		<p>Standard Task Force’s recommendations to assess the existing standards, modify and develop standards that support reliability performance and risk management, and work on an overall plan to transition existing standards to a new set of standards. One goal of this effort is to eliminate administrative requirements. This proposal takes the opposite approach and incorporates a new administrative requirement. We - and the industry as a whole based on the response to the Task Force - do not support such an approach. We suggest deleting this Requirement from the Standard. The CPOP should only apply to verbal communications. It could be implied that written communications (switching order affecting the BES) must have a CPOP, which would essentially be a writing guide procedure for how to write a procedure. The CPOP would need to be developed for each entity on how to write a CPOP and all the requirements contained in this draft standard. Every entity has unique switching instruction templates that have been developed over time in negotiations with unions, third-parties, etc, which have detailed procedures for their use. Requiring the use of a CPOP on top of that is adding additional complexity that adds nothing to the reliability of the BES.</p>
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute to reliability. The SDT agrees, and has deleted the requirement for a CPOP.</p>		
<p>The Empire District Electric Company</p>	<p>Disagree</p>	<p>What benefit to the BES would this provide? Rather I see more confusion by having entities develop different CPOPs. How will this benefit real time operation? This seems to be a requirement by NERC to assist NERC in analysis "after the fact" of an event, but in reality it can hinder daily operations.</p>
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute to reliability. The SDT agrees, and has deleted the requirement for a CPOP.</p>		
<p>Indiana Municipal Power Agency</p>	<p>Disagree</p>	<p>What reliability purpose is served by restating requirements two through seven in a Communications Protocol Operating Procedure (CPOP)? Since these requirements are the only required items in the CPOP, entities will just be restating these requirements in their CPOP. In addition, this is an administrative requirement which does not fit into the new performance-based standard principle that should be used by SDT's.</p>
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute to reliability. The SDT agrees, and has deleted the requirement for a CPOP.</p>		
<p>American Electric Power</p>	<p>Disagree</p>	<p>While having a procedure is important and the responsible entities should have a procedure to be compliant, there is not necessary to establish this requirement to have a procedure. We need to stay focused on what the purpose of the standard is to be and not dilute its effectiveness by focusing on documented procedures.</p>

Organization	Yes or No	Question 3 Comment
		Furthermore, if the extent of communication concerns warrants the extensive effort to establish pre-defined line and equipment identifiers, then this should be established in a uniform manner and not left to result in multitudes of approaches. There will likely need to be system modifications to address character limitations with respect to line and equipment identifiers.
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute to reliability. The SDT agrees, and has deleted the requirement for a CPOP.</p>		
Westar Energy	Disagree	While I agree that a CPOP is necessary and should include the elements of the requirements, I am not sold on all of the requirements yet as written.
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute to reliability. The SDT agrees, and has deleted the requirement for a CPOP. Please comment on the revisions we made to the remaining requirements.</p>		
ExxonMobil Research and Engineering	Disagree	While recording telephone conversations may be routine for utility companies, many industrial facilities that fall under the jurisdiction of this standard do not currently have the facilities necessary to record the conversations and store them for an extended length of time. If a company does not currently possess the capability to record telephone conversations, is it the intent of this standard to require them to install such facilities? If so, what is the time frame surrounding the installation of the facilities necessary to record and store telephone conversations? Currently, we maintain a log of our communications which includes the question or instruction and our (or in the case of a question the third party's) response. Does this satisfy the requirements for evidence as defined in measures M2 through M7?
<p>Response: The SDT thanks you for your comments. The SDT respectfully refers to the measures, which identify types of evidence that may be used. The SDT recognizes that similar requirements already exist within the COM standards and that the same types of evidence have been included in the associated measures. Having voice recordings is an example of what could be used as evidence; not what is required or the only type of evidence. Time frames for implementation of the Requirements of COM-003-1 are identified under the Proposed Effective Date in the second draft of the standard.</p>		
PPL	Disagree	Will the CPOPs be developed regionally, by RCs, by TOPs, by BAs? Will some entities have to adhere to various CPOPs since they may operate in various areas? Too many unanswered questions to support this concept.
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute</p>		

Organization	Yes or No	Question 3 Comment
<p>to reliability. The SDT agrees, and has deleted the requirement for a CPOP.</p>		
<p>Manitoba Hydro</p>	<p>Agree</p>	<p>Yes, with comments</p> <p>1) In this requirement “Interoperability Communications between personnel responsible for real time” becomes clouded when compared to the “Interoperability Communications” definition that states “exchange information between entities”.</p> <p>a. Improving the “Interoperability Communication” definition as per early suggestion should clarify this.</p> <p>2) Changing the order of requirements would make the flow of the standard smoother.</p> <p>a. Since this standard is mostly designed for real time communication, the requirements should pyramid down.</p> <ul style="list-style-type: none"> o R1 is fine. o R2 should be “English” o R3 should be “NATO” o R4 should be “Time” o R5 should be “Three-part communications” o R6 reserved for “Full name identification” (See below for clarification) <p>Conclusion: This requirement is acceptable as long as the enclosed comments are considered.</p>
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that having a CPOP does not directly contribute to reliability. The SDT agrees, and has deleted the requirement for a CPOP.</p> <p>The SDT supports the ordering of the comments you suggested. After aggregating all of the industry comments and changes, the SDT reformatted the posted Standard. While it is not Identical, some groupings and concepts are similar. We would be interested in your comments on this next draft version.</p>		

4. Requirement R2 of the draft COM-003-1 states, “Each Responsible Entity shall use pre-defined system condition terminology as defined in Attachment 1-COM-003-1 for all verbal and written Interoperability Communications.” Do you agree with this proposal? If not, please explain in the comment area.

Summary Consideration:

Most stakeholders who responded to this question disagreed with the proposal.

The major recommendation from the comments for question 4 was that the term “Interoperability Communications” should be removed from the standard. The OPCP SDT agreed and changed “Interoperability Communications” to “Operating Communications” which is now defined as – “Communication of instruction to change or maintain the state, status, output, or input of an Element or Facility of the Bulk Electric System.”

Several commenters pointed out that “Alert Levels” with defined colors are already in use by the Department of Homeland Security and may be misinterpreted.

Other commenters stated that attempting to mold all possible situations into the pre-defined terms is overly restrictive and may result in reduced accuracy, unnecessary confusion and misinterpretation.

The SDT proposes that determining alert levels falls outside the scope of a “communication protocol” and has removed the requirement (R2) to use Attachment 1 from the revised standard.

Organization	Yes or No	Question 4 Comment
British Columbia Transmission Corporation	Agree	
ExxonMobil Research and Engineering	Agree	
Florida Municipal Power Agency (FMPA) and some members	Agree	

Organization	Yes or No	Question 4 Comment
Old Dominion Electric Cooperative	Agree	
Oncor Electric Delivery	Agree	
Orange and Rockland Utilities, Inc.	Agree	
PacifiCorp	Agree	
Sunflower Electric Power Corp.	Agree	
Transmission System Operations	Agree	
Westar Energy	Agree	
American Electric Power	Disagree	<p>AEP suggests that RCIS be expanded to include the additional parties necessary to support Interoperability Communications. Without such an expansion, the communication requirements for the RC are burdensome and the effectiveness may be compromised by the volume of parties that will need to be included. Is it practical for RFC to communicate across some 60 parties or should this be limited to only those that need to know?</p> <p>Attachment 1 does not seem consistent with the stated purpose of this standard as Attachment seems to focus on defining the operating condition, not communication during alerts and emergencies. The SDT should consider if the scope of the standard is appropriate to resolve this discrepancy. To the extent that it gets mandated, Attachment 1 could be administered through the addition of “check boxes” on the expanded RCIS.</p>
<p>Response: The SDT thanks you for your comments and recommendations regarding RCIS expansion. While the SDT believes that it has merit, such an initiative is beyond the scope of this standard’s development. The team will recommend your proposal to the proper authority for their consideration.</p> <p>The SDT determined that determining alert levels falls outside the scope of a “communication protocol” and has removed the requirement to</p>		

Organization	Yes or No	Question 4 Comment
<p>use Attachment 1 from the revised standard.</p>		
<p>Sunflower Electric Power Corporation</p>	<p>Agree</p>	<p>As defined in Attachment 1 - COM-003-1</p>
<p>Response: The SDT thanks you for your comments. Note that the SDT determined that determining alert levels falls outside the scope of a “communication protocol” and has removed the requirement to use Attachment 1 from the revised standard.</p>		
<p>Tri-State Generation & Transmission Assoc.</p>	<p>Disagree</p>	<p>Attachment 1 explains Operating State Alert Levels that defines colors that are already in use by the Department of Homeland Security. Re-using these colors presents confusion to the operators of the BES. This places an unnecessary additional burden on Real Time day-to-day operations with a high risk of confusion in an emergency. Additionally, this is too complicated and requires a complete retraining of operators in the English language.</p>
<p>Response: The SDT thanks you for your comments. The SDT determined that determining alert levels falls outside the scope of a “communication protocol” and has removed the requirement to use Attachment 1 from the revised standard.</p>		
<p>Duke Energy</p>	<p>Disagree</p>	<p>Attachment 1 is limited to notifications from the RC to other entities regarding Alerts for Physical Security Emergency, Cyber Security Emergency or Transmission Emergency. Also, these types of notifications wouldn’t meet the definition of “Interoperability Communications”, because they wouldn’t necessarily be used to effect a change in the state or status of an element or facility of the Bulk Electric System.</p>
<p>Response: The SDT thanks you for your comments. The SDT determined that determining alert levels falls outside the scope of a “communication protocol” and has removed the requirement to use Attachment 1 from the revised standard. The term Interoperability Communications has been removed from the second draft of the standard.</p>		
<p>NorthWestern Energy</p>	<p>Disagree</p>	<p>Attachment 1 seems too overly complicated for emergency Operating circumstances and provides an additional burden for Real Time personnel who are stressed with difficult decisions already.</p>
<p>Response: The SDT thanks you for your comments. The SDT determined that determining alert levels falls outside the scope of a “communication protocol” and has removed the requirement to use Attachment 1 from the revised standard.</p>		
<p>Kansas City Power & Light</p>	<p>Disagree</p>	<p>Attachment 1 should be removed from this standard. This is a duplication of the alerts by the NERC Alerts system and the EISAC. In addition, these are reliability standards and should deal with real-time and expected future reliability issues. Alerts are an inappropriate for this standard.</p>

Organization	Yes or No	Question 4 Comment
<p>Response: The SDT thanks you for your comments. The SDT determined that determining alert levels falls outside the scope of a “communication protocol” and has removed the requirement to use Attachment 1 from the revised standard.</p>		
We Energies	Disagree	<p>Attempting to mold all possible circumstantial situations into the pre-defined terminologies is overly restrictive and may result in reduced accuracy, unnecessary confusion and misinterpretation. R2 should have the word “all” included (as is stated in this question) in order to restrict the applicability of Interoperability Communications to only those situations defined in Attachment 1. As noted in question 2, R2 should not apply to a TSP or LSE.</p>
<p>Response: The SDT thanks you for your comments. The SDT determined that determining alert levels falls outside the scope of a “communication protocol” and has removed the requirement to use Attachment 1 from the revised standard.</p> <p>Note that the definition of “Interoperability Communications” has been deleted from the revised standard and replaced with the term, “Operating Communication” with a more narrow focus on communications that change or maintain the state, status, output, or input of an Element or Facility of the Bulk Electric System.</p> <p>The SDT has removed the TSPs and LSEs because they were not bound by this requirement in the originating SAR.</p>		
California Independent System Operator	Disagree	<p>CAISO Comments;</p> <p>Regarding CEA;</p> <p>CIP-002 requires responsible entities to identify their cyber assets and critical cyber assets. This requirement does not address any identification and requires responsible entities to declare emergency conditions for non-critical assets. How does this provide an adequate level of reliability? What technical justification did the SDT use in determining an actual or imminent cyber or physical threat to any BES generating facility, substation, or transmission line constitute an emergency declaration?</p> <p>Regarding PSEA and CEA;</p> <p>This requirement does not provide an adequate level of reliability. As a general statement, receiving notification from the RC stating XXXX BA has identified (actual or imminent) physical or cyber threats affecting 1 or 999 control center(s), generating facility(ies), substation(s), or transmission line(s) close to your jurisdiction would provide an adequate level of reliability compared to XXXX BA has declared a PSEA or CEA condition ORANGE. Why is the SDT promoting requirements that reduce reliability and dumb-down communications? Is this the correct standard to add a requirement such as this? Physical and Cyber threats are addressed in the</p>

Organization	Yes or No	Question 4 Comment
		<p>CIP standards and emergencies are addressed in the EOP standards. Both require notification so why include it in a COM standard?</p> <p>Is there a possibility of double jeopardy between this requirement and CIP requirements?</p> <p>If this requirement must be included, Per attachment 1 - COM-003-1 (PSEA and CEA section) the Reliability Coordinator is the only responsible entity with any defined actions. It is suggested the SDT remove the BA, TO, TOP, GO, TSP, LSE, and DP due to lack of applicability. The same entities should be removed from the measure (M2) also. Until “soft words” such as “threat” and “sabotage” are defined or clarity is provided the industry should not be proposing standards based upon them.</p> <p>Regarding TEA;</p> <p>What technical justification did the SDT use in determining that notifying all BA, DP, GOP, TOP, and TO in the RC area of a possible IROL violation provides an adequate level of reliability? There are no associated actions for the BA, DP, GOP, TO, and TOP to perform upon notification so what is the purpose of this requirement?</p> <p>The Alert Level Guide is still in the test phase; does not the Alert Level Guide need to be approved prior to any standard which references the guide be approved?</p> <p>Comments: Per attachment 1 - COM-003-1 the Reliability Coordinator is the only responsible entity with any actions. Suggest removing BA, TO, TOP, GO, TSP, LSE, and DP. Or assign them actions. The same entities should be removed from the measure (M2) also.</p>
<p>Response: The SDT thanks you for your comments. The SDT determined, based on your comments and the comments of other stakeholders, that determining alert levels falls outside the scope of a “communication protocol” and has removed the requirement to use Attachment 1 from the revised standard.</p>		
<p>New York State Reliability Council</p>	<p>Disagree</p>	<p>Comments: NYSRC believes the use of “shall” and “all” coupled with the broad applicability of this Standard and the broad definition of Interoperability Communication will result in entities either not complying with R2 or making statements regarding the Operating Alert State when unnecessary. Attachment 1-Com-003 is very prescriptive in the use pre-defined terminology, colors and levels, and what to report on. There is no benefit to specifying the specific terminology. This requirement should require the RC to define the terms/levels/alert states to include within the CPOP that sufficiently communicate the increased levels of Alert or Response encountered/required. Many entities have invested time and training in the existing processes that meet the intent of this requirement.</p> <p>Read strictly, the only predefined alert conditions are Physical security, Cyber security and Transmission</p>

Organization	Yes or No	Question 4 Comment
		<p>Security as it applies to the RC and TOP only.</p> <p>NYSRC notes that R2 in the draft Standard does not match R2 in this question. Specifically the word ALL is not in the Standard.</p>
<p>Response: The SDT thanks you for your comments. The SDT determined that determining alert levels falls outside the scope of a “Communication Protocol” and has removed the requirement to use Attachment 1 from the revised standard.</p> <p>The SDT notes you referenced the term “Interoperability Communication” and the requirement to have a CPOP. Both have been eliminated in the second draft of the Standard. The SDT appreciates the observation and the word “all” was not in the requirement. It should not have been in the question.</p>		
National Grid	Disagree	<p>Defining specific wording per Attachment 1 is overly prescriptive. The requirements should focus on what is required not how. The RC and encompassing entities should be required to define terms that will be used in communications. This would allow for the use of terms that are well understood in an area rather than adding new terms.</p> <p>Also, System operators need to spend time looking for the right color and level to communicate the prevailing system condition terminology to avoid violating the standard. This task does not lend itself to promptly and effectively deal with the emergency situation.</p> <p>There is still plenty of grey area in Attachment 1 and there does not appear to be any differentiation in actions taken based on the alert levels.</p> <p>Finally, the section Background Information in the Comment's form mentions “The SDT proposes four system condition alerts instead of initial three in the RCWG version.” However, Attachment 1 only mentions 3 alerts - Physical Security, Cyber Security, and Transmission Emergency Alerts leading to confusion.</p>
<p>Response: The SDT thanks you for your comments. The SDT determined that determining alert levels falls outside the scope of a “communication protocol” and has removed the requirement to use Attachment 1 from the revised standard.</p>		
American Municipal Power	Agree	<p>Eliminating lax communications and improving identifiers is one of the cheapest and easiest ways to improve reliability.</p>
<p>Response: The SDT thanks you for your comments. Your insight is refreshing as well as accurate.</p>		
Transmission	Disagree	<p>FPL agrees that standard system condition terminology could be beneficial in communications but this</p>

Organization	Yes or No	Question 4 Comment
Owner		requirement introduces alert level conventions with no clarity on what the corresponding associated actions for such levels are and as a result, aside from the value derived from have improvement in terminology during communications, it is unclear what reliability improvements this will achieve in carrying out instructions since details on what sort of tasks need to be carried out for each level have not been defined. Also, this requirement should clearly indicate that this alerting system and any communication conventions be required for emergency conditions.
<p>Response: The SDT thanks you for your comments. The SDT determined that determining alert levels falls outside the scope of a “communication protocol” and has removed the requirement to use Attachment 1 from the revised standard.</p>		
Bonneville Power Administration	Agree	In Attachment #1 - Operating State Alert Levels, for the Transmission Emergency Alert (TEA) Level 2 definition, a “why” needs to be incorporated into the definition. It appears that the reason we're going to TEA 2 is to avoid violation of an SOL but it needs to be called out.
<p>Response: The SDT thanks you for your comments. The SDT is interested in your comment but would require additional information and discussion to address it properly.</p>		
Northeast Utilities	Disagree	It is not clear what value there is in identifying alert levels since there does not appear to be any differentiation in actions taken based on the alert levels. Additionally, it has been our experience of during the field-test of these Alert Levels, that there are inconsistencies in when to implement various stages of Alerts and, we believe, this introduces more confusion than exists today.
<p>Response: The SDT thanks you for your comments. The SDT determined that determining alert levels falls outside the scope of a “communication protocol” and has removed the requirement to use Attachment 1 from the revised standard.</p>		
Independent Electricity System Operator	Disagree	It is not clear what value there is in identifying alert levels. There does not appear to be any differentiation in actions taken based on the alert levels. Why not just state the number of substations attacked, etc? Further, the “pre-defined” system conditions and alert levels are too detailed and overly prescriptive. System operators need to spend time looking for the right color and level to communicate the prevailing system condition terminology to avoid violating the standard. This task, in and of itself, does not ensure nor improve reliability and does not lend itself to promptly and effectively deal with the emergency situation.
<p>Response: The SDT thanks you for your comments. The SDT determined that determining alert levels falls outside the scope of a “communication protocol” and has removed the requirement to use Attachment 1 from the revised standard.</p>		

Organization	Yes or No	Question 4 Comment
IRC Standards Review Committee	Disagree	<p>It is not clear what value there is in identifying alert levels.</p> <p>There does not appear to be any differentiation in actions taken based on the alert levels. Why not just state the number of substations attacked, etc?</p> <p>Further, the “pre-defined” system conditions and alert levels are too detailed and overly prescriptive. System operators need to spend time looking for the right color and level to communicate the prevailing system condition terminology to avoid violating the standard. This task does not lend itself to promptly and effectively deal with the emergency situation.</p> <p>Many RC communications are issued to multiple parties using blast communication systems such as the RCIS. Several of the parties such as Distribution Provider and Generator Operator cannot have access to these systems due FERC standards of conduct requirements.</p> <p>Attachment 1 and R2 do not appear to be in synch primarily due to the definition of Interoperability Communications. By definition, Interoperability Communication is about how entities change the state of the BES and Attachment 1 is about notifying of what already happened to the BES.</p>
<p>Response: The SDT thanks you for your comments. The SDT determined that determining alert levels falls outside the scope of a “communication protocol” and has removed the requirement to use Attachment 1 from the revised standard.</p>		
ISO New England Inc.	Disagree	<p>It is not clear what value there is in identifying alert levels.</p> <p>There does not appear to be any differentiation in actions taken based on the alert levels. Why not just state the number of substations attacked, etc?</p> <p>Further, the “pre-defined” system conditions and alert levels are too detailed and overly prescriptive. System operators need to spend time looking for the right color and level to communicate the prevailing system condition terminology to avoid violating the standard. This task does not lend itself to promptly and effectively deal with the emergency situation.</p> <p>Many RC communications are issued to multiple parties using blast communication systems such as the RCIS. Several of the parties such as Distribution Provider and Generator Operator cannot have access to these systems due FERC standards of conduct requirements.</p> <p>Attachment 1 and R2 do not appear to be in synch primarily due to the definition of Interoperability Communications. By definition, Interoperability Communication is about how entities change the state of the BES and Attachment 1 is about notifying of what already happened to the BES.</p>

Organization	Yes or No	Question 4 Comment
<p>Response: The SDT thanks you for your comments. The SDT determined that determining alert levels falls outside the scope of a “communication protocol” and has removed the requirement to use Attachment 1 from the revised standard.</p>		
<p>Dynegy</p>	<p>Disagree</p>	<p>It is not clear what value there is in identifying alert levels.</p> <p>There does not appear to be any differentiation in actions taken based on the alert levels. Why not just state the number of substations attacked, etc?</p> <p>Further, the “pre-defined” system conditions and alert levels are too detailed and overly prescriptive. System operators need to spend time looking for the right color and level to communicate the prevailing system condition terminology to avoid violating the standard. This task does not lend itself to promptly and effectively deal with the emergency situation.</p> <p>Many RC communications are issued to multiple parties using blast communication systems such as the RCIS. Several of the parties such as Distribution Provider and Generator Operator cannot have access to these systems due FERC standards of conduct requirements.</p> <p>Attachment 1 and R2 do not appear to be in synch primarily due to the definition of Interoperability Communications. By definition, Interoperability Communication is about how entities change the state of the BES and Attachment 1 is about notifying of what already happened to the BES.</p>
<p>Response: The SDT thanks you for your comments. The SDT determined that determining alert levels falls outside the scope of a “communication protocol” and has removed the requirement to use Attachment 1 from the revised standard.</p>		
<p>Great River Energy</p>	<p>Disagree</p>	<p>It is not clear what value there is in identifying alert levels.</p> <p>There does not appear to be any differentiation in actions taken based on the alert levels. Why not just state the number of substations attacked, etc?</p> <p>Further, the “pre-defined” system conditions and alert levels are too detailed and overly prescriptive. System operators need to spend time looking for the right color and level to communicate the prevailing system condition terminology to avoid violating the standard. This task does not lend itself to promptly and effectively deal with the emergency situation.</p> <p>Many RC communications are issued to multiple parties using blast communication systems such as the RCIS. Several of the parties such as Distribution Provider and Generator Operator cannot have access to these systems due FERC standards of conduct requirements.</p> <p>Attachment 1 and R2 do not appear to be in synch primarily due to the definition of Interoperability</p>

Organization	Yes or No	Question 4 Comment
		<p>Communications. By definition, Interoperability Communication is about how entities change the state of the BES and Attachment 1 is about notifying of what already happened to the BES.</p>
<p>Response: The SDT thanks you for your comments. The SDT determined that determining alert levels falls outside the scope of a “communication protocol” and has removed the requirement to use Attachment 1 from the revised standard.</p>		
<p>Hydro-Québec TransEnergie</p>	<p>Disagree</p>	<p>It is not clear what value there is in identifying these alert levels. There does not appear to be any differentiation in actions taken based on the alert levels. Just stating the severity and details of the incident should suffice.</p> <p>There does not appear to be any differentiation in actions taken based on the alert levels. Why not just state the number of substations attacked, etc?</p> <p>Further, the “pre-defined” system conditions and alert levels are too detailed and overly prescriptive. System operators will need to spend time looking for the right color and level to communicate the prevailing system condition terminology to avoid violating the standard. This task does not lend itself to promptly and effectively deal with the emergency situation. The level(s) identified in the notification text are at odds with the condition (color versus numerical). Suggest that the standard either use Condition (color) or the level (numerical).</p> <p>Many RC communications are issued to multiple parties using blast communication systems such as the RCIS. Several of the listed entities such as Distribution Provider and Generator Operator cannot have access to these systems due FERC standards of conduct requirements.</p> <p>Attachment 1 and R2 are not consistent with the definition of Interoperability Communications. By definition, Interoperability Communication pertains to all communications about how entities change the state of the BES (not just physical or cyber attacks). Attachment 1 is about notifying of what physical and cyber attacks have already happened to the BES. It is not clear in the context of Interoperability Communications what the recipient of a specific notification is expected to do when there is a change of state or status of an element or facility of the Bulk Electric System.</p> <p>Attachment 1 pertains specifically to Operating State Alert Levels and says nothing about the communication of information to be used to change the state or status of a BES element or facility (which is the SDT’s proposed definition of Interoperability Communications). Therefore, it is not appropriate to require that all verbal and written Interoperability Communications use the pre-defined terminology in Attachment 1. Only those communications concerning Operating State Alert Levels should be required to use that terminology.</p> <p>By the proposed definition, such communications are not Interoperability Communications since the</p>

Organization	Yes or No	Question 4 Comment
		<p>information is not used to change the state or status of a BES element or facility. The SDT needs to revise this requirement to clarify that it pertains only to communicating the Operating State Alert Levels and nothing more.</p> <p>None of the examples in either of the attachments appear to address EEAs (EEA is mentioned in the top paragraph of page 9 that is included in EOP-002-2.1) or SOLs. This limits the use of Interoperability Communications to only events where there exists either a physical or cyber threat, or where an IROL can't be mitigated.</p> <p>The requirements should focus on what is required, not how. The RC and encompassed entities should be required to define terms that will be used in communications. This would allow for the use of terms that are well understood in an area, rather than having to add new terms.</p> <p>The Background Information in this Comment Form introductory section mentions "The SDT proposes four system condition alerts instead of initial three in the RCWG version." However, Attachment 1 only mentions 3 alerts - Physical Security, Cyber Security, and Transmission Emergency Alerts leading to confusion.</p> <p>Finally, Attachment should only be used as a guide.</p>
<p>Response: The SDT thanks you for your comments. The SDT determined that determining alert levels falls outside the scope of a "communication protocol" and has removed the requirement to use Attachment 1 from the revised standard.</p>		
<p>Midwest ISO Standards Collaborators</p>	<p>Disagree</p>	<p>It is not clear what value there is in identifying alert levels.</p> <p>There does not appear to be any differentiation in actions taken based on the alert levels. Why not just state the number of substations attacked, etc?</p> <p>Many RC communications are issued to multiple parties using blast communication systems such as the RCIS. Several of the parties such as Distribution Provider and Generator Operator cannot have access to these systems due FERC standards of conduct requirements.</p> <p>Attachment 1 and R2 are not consistent with the definition of Interoperability Communications. By definition, Interoperability Communication pertains to all communications about how entities change the state of the BES (not just about physical or cyber attacks). Attachment 1 is only about notifying of what physical and cyber attacks and transmission emergencies have already happened to the BES.</p>
<p>Response: The SDT thanks you for your comments. Response: The SDT determined that determining alert levels falls outside the scope of a "communication protocol" and has removed the requirement to use Attachment 1 from the revised standard.</p>		

Organization	Yes or No	Question 4 Comment
Northeast Power Coordinating Council	Disagree	<p>It is not clear what value there is in identifying these alert levels.</p> <p>There does not appear to be any differentiation in actions taken based on the alert levels. Just stating the severity and details of the incident should suffice.</p> <p>Further, the “pre-defined” system conditions and alert levels are too detailed and overly prescriptive. System operators will need to spend time looking for the right color and level to communicate the prevailing system condition terminology to avoid violating the standard. This task does not lend itself to promptly and effectively deal with the emergency situation. The level(s) identified in the notification text are at odds with the condition (color versus numerical). Suggest that the standard either use Condition (color) or the level (numerical).</p> <p>Many RC communications are issued to multiple parties using blast communication systems such as the RCIS. Several of the listed entities such as Distribution Provider and Generator Operator cannot have access to these systems due FERC standards of conduct requirements.</p> <p>Attachment 1 and R2 are not consistent with the definition of Interoperability Communications. By definition, Interoperability Communication pertains to all communications about how entities change the state of the BES (not just physical or cyber attacks). Attachment 1 is about notifying of what physical and cyber attacks have already happened to the BES.</p> <p>It is not clear in the context of Interoperability Communications what the recipient of a specific notification is expected to do when there is a change of state or status of an element or facility of the Bulk Electric System.</p> <p>Attachment 1 pertains specifically to Operating State Alert Levels and says nothing about the communication of information to be used to change the state or status of a BES element or facility (which is the SDT’s proposed definition of Interoperability Communications). Therefore, it is not appropriate to require that all verbal and written Interoperability Communications use the pre-defined terminology in Attachment 1. Only those communications concerning Operating State Alert Levels should be required to use that terminology. By the proposed definition, such communications are not Interoperability Communications since the information is not used to change the state or status of a BES element or facility. The SDT needs to revise this requirement to clarify that it pertains only to communicating the Operating State Alert Levels and nothing more.</p> <p>None of the examples in either of the attachments appear to address EEAs (EEA is mentioned in the top paragraph of page 9 that is included in EOP-002-2.1) or SOLs. This limits the use of Interoperability Communications to only events where there exists either a physical or cyber threat, or where an IROL can’t be mitigated. The requirements should focus on what is required, not how.</p>

Organization	Yes or No	Question 4 Comment
		<p>The RC and encompassed entities should be required to define terms that will be used in communications. This would allow for the use of terms that are well understood in an area, rather than having to add new terms.</p> <p>The Background Information in this Comment Form introductory section mentions “The SDT proposes four system condition alerts instead of initial three in the RCWG version.” However, Attachment 1 only mentions 3 alerts - Physical Security, Cyber Security, and Transmission Emergency Alerts leading to confusion.</p>
<p>Response: The SDT thanks you for your comments. The SDT determined that determining alert levels falls outside the scope of a “communication protocol” and has removed the requirement to use Attachment 1 from the revised standard.</p>		
Western Area Power Administration	Disagree	<p>It’s very confusing to refer to each condition using a color and/or a level number. In other areas, we are accustomed to using Alert Levels (i.e. EEA states). The color designation seems to throw in an unnecessary element that doesn’t add any value.</p>
<p>Response: The SDT thanks you for your comments. The SDT determined that determining alert levels falls outside the scope of a “communication protocol” and has removed the requirement to use Attachment 1 from the revised standard.</p>		
Long Island Power Authority	Disagree	<p>LIPA believes the use of “shall” and “all” coupled with the broad applicability of this Standard and the broad definition of Interoperability Communication will result in entities either not complying with R2 or making statements regarding the Operating Alert State when unnecessary.</p> <p>Attachment 1-Com-003 is very prescriptive in the use pre-defined terminology, colors and levels, and what to report on. There is no benefit to specifying the specific terminology. This requirement should require the RC to define the terms/levels/alert states to include within the CPOP that sufficiently communicate the increased levels of Alert or Response encountered/required.</p> <p>Many entities have invested time and training in the existing processes that meet the intent of this requirement.</p> <p>Read strictly, the only predefined alert conditions are Physical security, Cyber security and Transmission Security as it applies to the RC and TOP only.</p> <p>LIPA notes that R2 in the draft Standard does not match R2 in this question. Specifically the word ALL is not in the Standard.</p>
<p>Response: The SDT thanks you for your comments. The SDT determined that determining alert levels falls outside the scope of a “communication protocol” and has removed the requirement to use Attachment 1 from the revised standard.</p>		

Organization	Yes or No	Question 4 Comment
Manitoba Hydro	Disagree	<p>Move this new requirement R1.2 in COM-002-2.</p> <p>1) COM-003-1 R2 “Pre-defined system condition terminology” are all planned definitions.</p> <p>a.COM-003-1 purpose is to “convey information effectively” meaning the use of English, NATO, three-part communication, 24 time format are all verbal aspects to accomplish this purpose and not suited to pre-defined or planned items.</p> <p>2) COM-003-1 R2 appears more appropriate and relevant placed in COM-002-2. COM-002-2’s Purpose is “capabilities for addressing real time emergencies and to ensure communications by personnel are effective.”</p> <p>a. Placing “Pre-defined system condition terminology” in COM-002-2 after R1.1 as R1.2 appears to have more of a chronological approach.</p> <p>i.R1.1 states “conditions that could threaten”</p> <p>ii.R1.2 use “pre defined system conditions”</p> <p>Conclusion: Remove COM-003-1 R2 and replace in COM-002-2 as R1.2</p>
<p>Response: The SDT thanks you for your comments. The SDT determined that determining alert levels falls outside the scope of a “communication protocol” and has removed the requirement to use Attachment 1 from the revised standard.</p>		
NERC Staff	Disagree	<p>NERC staff agrees with the principle behind Requirement R2. However, it appears that two separate communication actions are being performed, the action to notify the Reliability Coordinator, and the action by the Reliability Coordinator to communicate the alert level to affected functional entities. Therefore, we recommend that that Requirement R2 be split into two requirements and offer the following wording:</p> <p>A Balancing Authority, Transmission Owner, Transmission Operator, Generator Operator, Transmission Service Provider, Load Serving Entity and Distribution Provider shall notify its Reliability Coordinator when it becomes aware that there is a situation involving the facilities under its control that meets the criteria for an alert, as specified in Attachment 1 - Operating State Alert Levels, to keep the Reliability Coordinator informed on the initial and subsequent status of the situation.</p> <p>When a Reliability Coordinator is notified (or becomes aware) that there is a situation within its Reliability Coordinator Area that meets conditions specified in Attachment 1 - Operating State Alert Levels, the Reliability Coordinator shall use the phraseology when making the notifications specified in Attachment 1 to keep others informed on the initial and subsequent status of the situation.</p> <p>The NERC staff recommends that the SDT review the content of the Attachment for consistency, clarity and</p>

Organization	Yes or No	Question 4 Comment
		omissions (such as found in the table on page 14 of the draft - the cell, "Notify the following entities:" is blank).
<p>Response: The SDT thanks you for your comments. The SDT determined that determining alert levels falls outside the scope of a "communication protocol" and has removed the requirement to use Attachment 1 from the revised standard.</p>		
NextEra Energy Resources, LLC	Disagree	NextEra agrees that standard system condition terminology could be beneficial in communications but this requirement introduces alert level conventions with no clarity on what the corresponding associated actions for such levels are and as a result, aside from the value derived from having improvement in terminology during communications, it is unclear what reliability improvements this will achieve in carrying out instructions.
<p>Response: The SDT thanks you for your comments. The SDT determined that determining alert levels falls outside the scope of a "communication protocol" and has removed the requirement to use Attachment 1 from the revised standard.</p>		
Indiana Municipal Power Agency	Disagree	No. Does attachment 1 cover all possible communication scenarios and terminology? Using pre-defined condition terminology does not allow flexibility in communications and for near changes in communications that might be needed depending on the situation.
<p>Response: The SDT thanks you for your comments. Response: The SDT determined that determining alert levels falls outside the scope of a "communication protocol" and has removed the requirement to use Attachment 1 from the revised standard.</p>		
PEF	Disagree	PEF recommends that the color coding and definitions that are used by Homeland Security also be used for the notification of physical and cyber emergency alerts reported to the RC. This would follow the ES-ISAC standard already adopted by the electric industry. If the attachment is adopted as is, PEF recommends adding the EEA levels to provide "pre-defined system condition terminology."
<p>Response: The SDT thanks you for your comments. The SDT determined that determining alert levels falls outside the scope of a "communication protocol" and has removed the requirement to use Attachment 1 from the revised standard.</p>		
NYSEG	Disagree	R2 indicates the need to use pre-defined system condition terminology for all verbal and written Interoperability Communications yet Attachment 1 only defines transmission loading and physical and cyber security threats. Either need to rewrite the Requirement to include only these circumstances, or define every possible system condition used in Interoperability Communications. Additionally, there does not appear to be any benefit in attempting to pre-define transmission loading, and physical and cyber alert system conditions since the actions associated with each are similar, if not the same,

Organization	Yes or No	Question 4 Comment
		for almost all conditions.
<p>Response: The SDT thanks you for your comments. The SDT determined that determining alert levels falls outside the scope of a “communication protocol” and has removed the requirement to use Attachment 1 from the revised standard.</p>		
Bureau of Reclamation	Disagree	Reclamation does not agree with the Attachment 1 condition color coding as it will conflict with the DHS system of notification of change in threat condition. The three color system is unique to the notifications issued by DHS. Use of that color system is reserved by the DHS. Federal agencies are required to perform specific tasks when DHS issues alerts or changes the threat condition. Only DHS can change the threat condition. The concept needs to be revised considerably to avoid the conflict or create a potential security issue.
<p>Response: The SDT thanks you for your comments. The SDT determined that determining alert levels falls outside the scope of a “communication protocol” and has removed the requirement to use Attachment 1 from the revised standard.</p>		
Pepco Holdings, Inc. - Affiliates	Disagree	Requiring system operators to use the color-coded system condition terminology during communication adds a layer of responsibility that will distract from the operator’s real-time reliability-related tasks.
<p>Response: The SDT thanks you for your comments. The SDT determined that determining alert levels falls outside the scope of a “communication protocol” and has removed the requirement to use Attachment 1 from the revised standard.</p>		
Georgia Transmission Corp	Disagree	Should only include physical security emergency, cyber security emergency, or transmission emergency as stated in Attachment 1 instead of Interoperability Communications.
<p>Response: The SDT thanks you for your comments. The proposed term “Interoperability Communication” has been removed from the Standard. The SDT determined that determining alert levels falls outside the scope of a “communication protocol” and has removed the requirement to use Attachment 1 from the revised standard.</p>		
Southern Company Transmission	Disagree	<p>Southern Company supports the SERC SOS comments.</p> <p>SERC SOS comments:</p> <p>The Alert Level Guides in Attachment 1 are not consistent with the proposed definitions of reliability-related communications. Both the Reliability Directive and Interoperability Communication, as currently defined, require some emergency action or change of equipment status. Yet the Alert Level Guides were intended for announcement, not actions</p> <p>Requiring system operators to use the color-coded system condition terminology during communication adds a</p>

Organization	Yes or No	Question 4 Comment
		<p>layer of responsibility that will distract from the operator’s real-time reliability-related tasks.</p> <p>We also do not feel that these Alert Level Guides apply to all the responsible entities identified under Applicability in the draft standard - for example, TSPs and LSEs are not included in the list of notifications.</p> <p>The requirement to use the central time zone for logging the time of an alert is problematic in that all communication tools, such as the RCIS, will need to be re-vamped</p> <p>We question whether there will be a measurable reliability benefit by so doing. There is also some redundancy in the Alert Level Guides - for example, the CIP-001 standard requires notification of sabotage events - it should not be repeated in this standard.</p>
<p>Response: The SDT thanks you for your comments. The SDT determined that determining alert levels falls outside the scope of a “communication protocol” and has removed the requirement to use Attachment 1 from the revised standard.</p>		
Entergy Services	Disagree	<p>Term Interoperability Communications should be removed from the standard. As written, the actions that fall into interoperability communications are much broader than the set of conditions described in the table in attachment 1. To the extent that the communications are outside of the ones in the table, entities will be non-compliant because their communications are not pre-defined.</p> <p>Recommend that this requirement be changed to indicate that “Any Reliability Coordinator or Transmission Operator experiencing a physical security emergency, cyber security emergency, or transmission emergency will communicate their status using the conditions and processes in Attachment 1.”</p>
<p>Response: The SDT thanks you for your comments. The SDT determined that determining alert levels falls outside the scope of a “communication protocol” and has removed the requirement to use Attachment 1 from the revised standard.</p>		
PJM	Disagree	<p>The Alert Level Guides in Attachment 1 are not consistent with the proposed definitions of reliability-related communications. Both the Reliability Directive and Interoperability Communication, as currently defined, require some emergency action or change of equipment status. Yet the Alert Level Guides were intended for announcement, not actions.</p> <p>Further, the “pre-defined” system conditions and alert levels are too detailed and overly prescriptive. System operators need to spend time looking for the right color and level to communicate the prevailing system condition terminology to avoid violating the standard. This task does not lend itself to promptly and effectively deal with the emergency situation.</p> <p>We also do not feel that these Alert Level Guides apply to all the responsible entities identified under</p>

Organization	Yes or No	Question 4 Comment
		<p>Applicability in the draft standard - for example, TSPs and LSEs are not included in the list of notifications. The requirement to use the central time zone for logging the time of an alert is problematic in that all communication tools, such as the RCIS, will need to be re-vamped.</p> <p>We question whether there will be a measurable reliability benefit by doing so. There is also some redundancy in the Alert Level Guides - for example, the CIP-001 standard requires notification of sabotage events - it should not be repeated in this standard. This also needs to be reconciled with EOP-004 and CIP-001 and the SAR formed to address those redundancies.</p> <p>It is not clear what value there is in identifying alert levels. There does not appear to be any differentiation in actions taken based on the alert levels. Why not just state the number of substations attacked, etc?</p> <p>Attachment 1 and R2 do not appear to be in synch primarily due to the definition of Interoperability Communications. By definition, Interoperability Communication is about how entities change the state of the BES and Attachment 1 is about notifying of what already happened to the BES.</p>
<p>Response: The SDT thanks you for your comments. The SDT determined that determining alert levels falls outside the scope of a “communication protocol” and has removed the requirement to use Attachment 1 from the revised standard.</p>		
PJM SOS Comments	Disagree	<p>The Alert Level Guides in Attachment 1 are not consistent with the proposed definitions of reliability-related communications. Both the Reliability Directive and Interoperability Communication, as currently defined, require some emergency action or change of equipment status. Yet the Alert Level Guides were intended for announcement, not actions.</p> <p>Further, the “pre-defined” system conditions and alert levels are too detailed and overly prescriptive. System operators need to spend time looking for the right color and level to communicate the prevailing system condition terminology to avoid violating the standard. This task does not lend itself to promptly and effectively deal with the emergency situation.</p> <p>We also do not feel that these Alert Level Guides apply to all the responsible entities identified under Applicability in the draft standard - for example, TSPs and LSEs are not included in the list of notifications. The requirement to use the central time zone for logging the time of an alert is problematic in that all communication tools, such as the RCIS, will need to be re-vamped.</p> <p>We question whether there will be a measurable reliability benefit by doing so. There is also some redundancy in the Alert Level Guides - for example, the CIP-001 standard requires notification of sabotage events - it should</p>

Organization	Yes or No	Question 4 Comment
		<p>not be repeated in this standard. This also needs to be reconciled with EOP-004 and CIP-001 and the SAR formed to address those redundancies.</p> <p>It is not clear what value there is in identifying alert levels. There does not appear to be any differentiation in actions taken based on the alert levels. Why not just state the number of substations attacked, etc?</p> <p>Attachment 1 and R2 do not appear to be in synch primarily due to the definition of Interoperability Communications. By definition, Interoperability Communication is about how entities change the state of the BES and Attachment 1 is about notifying of what already happened to the BES.</p>
<p>Response: The SDT thanks you for your comments. The SDT determined that determining alert levels falls outside the scope of a “communication protocol” and has removed the requirement to use Attachment 1 from the revised standard.</p>		
<p>SERC OC&SOS Standards Review Group</p>	<p>Disagree</p>	<p>The Alert Level Guides in Attachment 1 are not consistent with the proposed definitions of reliability-related communications. Both the Reliability Directive and Interoperability Communication, as currently defined, require some emergency action or change of equipment status. Yet the Alert Level Guides were intended for announcement, not actions</p> <p>Requiring system operators to use the color-coded system condition terminology during communication adds a layer of responsibility that will distract from the operator’s real-time reliability-related tasks.</p> <p>We do not feel that these Alert Level Guides apply to all the responsible entities identified under Applicability in the draft standard - for example, TSPs and LSEs are not included in the list of notifications.</p> <p>There is also some redundancy in the Alert Level Guides - for example, the CIP-001 standard requires notification of sabotage events - it should not be repeated in this standard.</p>
<p>Response: The SDT thanks you for your comments. The SDT determined that determining alert levels falls outside the scope of a “communication protocol” and has removed the requirement to use Attachment 1 from the revised standard.</p>		
<p>E.ON U.S. LLC</p>	<p>Disagree</p>	<p>The attachment adds a whole new lexicon for BES operators. E.ON U.S. suggests integrating attachment 1 and the relative alert levels into the EOP standards. The purpose of COM-003 indicates this standard is to ensure understanding of information during emergency alerts and emergency situations and not to establish the conditions, required notification, or levels of emergency alerts.</p> <p>While the attachment has been identified as a product of the RCWG it is unclear whether it has been reviewed and approved through the normal NERC and industry vetting.</p>

Organization	Yes or No	Question 4 Comment
<p>Response: The SDT thanks you for your comments. The SDT determined that determining alert levels falls outside the scope of a “communication protocol” and has removed the requirement to use Attachment 1 from the revised standard.</p>		
MRO NERC Standards Review Subcommittee	Disagree	The attachment only applies to the RC. We recommend R2 state that the RC shall use pre-determined system condition terminology and the BA, DP, GOP, TOP, and TO shall follow orders and directives unless such acts violate safety, etc. Either the attachment should be changed or the requirement should be changed for accurate accountabilities.
<p>Response: The SDT thanks you for your comments. The SDT determined that determining alert levels falls outside the scope of a “communication protocol” and has removed the requirement to use Attachment 1 from the revised standard.</p>		
ATC and ITC	Disagree	The Attachment pertains to requirements of the RC, not all entities. Either the attachment should be changed or the requirement should be changed for accurate accountabilities.
<p>Response: The SDT thanks you for your comments. The SDT determined that determining alert levels falls outside the scope of a “communication protocol” and has removed the requirement to use Attachment 1 from the revised standard.</p>		
Consumers Energy	Disagree	The COM Standards should put forth the methodology of communication, not provide communication for each event. For example, CIP-001 describes the communication to take place for CIP attacks, be they physical or cyber, EOP-002 describes the process for Generation and Capacity Emergencies. Utilizing the similar sounding vernacular (EEA,CEA,PSEA,TEA) is not prudent.
<p>Response: The SDT thanks you for your comments. The SDT determined that determining alert levels falls outside the scope of a “communication protocol” and has removed the requirement to use Attachment 1 from the revised standard.</p>		
Progress Energy Carolina, Inc	Disagree	The link between COM-003-1 R2 and Attachment 1 for entities other than the Reliability Coordinator is unclear. R2 links with Attachment 1 and is applicable to a host of entities while Attachment 1 seems to only provide pre-defined system condition terminology for use during notifications by the RC to other entities.
<p>Response: The SDT thanks you for your comments. The SDT determined that determining alert levels falls outside the scope of a “communication protocol” and has removed the requirement to use Attachment 1 from the revised standard.</p>		
PSEG Companies	Disagree	The PSEG Companies agree with the concerns expressed in the comments filed by the PJM System Operations Subcommittee (SOS) Group.
<p>Response: The SDT thanks you for your comments.</p>		

Organization	Yes or No	Question 4 Comment
<p>Please see our responses to by the PJM System Operations Subcommittee (SOS) Group.</p>		
<p>Pacific Northwest Small Utilities Comment Group</p>	<p>Disagree</p>	<p>The referenced attachment appears to list alert levels for RCs to use in communicating threats to BAs, DPs, GOs, TOPs and TOs. This requirement should apply only to RCs.</p>
<p>Response: The SDT thanks you for your comments. The SDT determined that determining alert levels falls outside the scope of a “communication protocol” and has removed the requirement to use Attachment 1 from the revised standard.</p>		
<p>Xcel Energy</p>	<p>Disagree</p>	<p>The use of Yellow, Orange and Red, as related to the various alert levels, may conflict with existing color requirements that entities already have in use. We recommend instead only refer to the PSEA, CEA and TEA levels. Additionally, it is unclear how R2 applies to anyone other than the RC. Attachment 1 seems to only apply to the RC. If this is correct, then why would the other entities listed in R2 have to incorporate that terminology into their CPOP? If this is not correct, please clarify the requirement so that the other entities can clearly understand what is expected.</p>
<p>Response: The SDT thanks you for your comments. The SDT determined that determining alert levels falls outside the scope of a “communication protocol” and has removed the requirement to use Attachment 1 from the revised standard.</p>		
<p>The Empire District Electric Company</p>	<p>Disagree</p>	<p>This attachment is not needed. It is a duplicate of the NERC Alert process that is already established as well as CIP-001 Sabotage reporting requirement R2 along with requirements of EOP-001 R5 and EOP-004 R2 dealing with disturbance reporting. The last thing the industry needs is more paperwork requirements that are redundant when an emergency event happens on the system.</p>
<p>Response: The SDT thanks you for your comments. The SDT determined that determining alert levels falls outside the scope of a “communication protocol” and has removed the requirement to use Attachment 1 from the revised standard.</p>		
<p>Ameren</p>	<p>Disagree</p>	<p>This is an ambiguous reference in all of NERC standards for all but the RC. How would an LSE interpret this in communication between them and a DP. Would there ever be a red condition for issues that affect them? And as it relates to operating, it looks like this is exclusive of EEA type events, i.e. BA type emergencies seem to not be represented. It would seem that the pre-defined conditions should be established for each interaction that each entity might have, e.g. a predefined set for a BA to a TOP, a BA to an LSE, et al. While each entity can certainly address the 3 scenarios in Attachment 1 (RC to entity) those are not the only conditions where communication affects BES reliability.</p>

Organization	Yes or No	Question 4 Comment
<p>Response: The SDT thanks you for your comments. The SDT determined that determining alert levels falls outside the scope of a “communication protocol” and has removed the requirement to use Attachment 1 from the revised standard.</p>		
NIPSCO	Disagree	This may not be necessary.
<p>Response: The SDT thanks you for your comments. The SDT determined that determining alert levels falls outside the scope of a “communication protocol” and has removed the requirement to use Attachment 1 from the revised standard.</p>		
Power South Energy	Disagree	This requirement is unnecessary.
<p>Response: The SDT thanks you for your comments. The SDT determined that determining alert levels falls outside the scope of a “communication protocol” and has removed the requirement to use Attachment 1 from the revised standard.</p>		
PPL	Disagree	This requirement should be applicable to a RC only. Some registered entities may not even receive these types of communications. Since the responses are the same for all levels noted in attachment 1, there is questionable value to defining this level of additional administrative detail.
<p>Response: The SDT thanks you for your comments. The SDT determined that determining alert levels falls outside the scope of a “communication protocol” and has removed the requirement to use Attachment 1 from the revised standard.</p>		
Puget Sound Energy	Disagree	<p>This requirement, along with the associated M2, will be almost impossible to substantiate for audit purposes. For example, would an entity be required to present, and an auditor be required to listen to, voice recorder records for the data retention time? It is difficult to image another way to prove an entity complied with this requirement</p> <p>Further the statement "as defined in Attachment 1" implies a set of definitions can be found and yet Attachment 1 is not structured in such that way.</p> <p>Is the system condition terminology just the terms "condition yellow", "condition orange", and "condition red". The procedural and time aspects described in this attachment create confusion as to whether compliance is required under this standard or a different one.</p> <p>Suggest more simplified presentation of definitions or glossary for clarity.</p> <p>Finally the inclusion of "written" communications creates a question relative to real-time information or whether this is extending beyond that timeframe. Most real time information sharing is verbal due to the</p>

Organization	Yes or No	Question 4 Comment
		urgency of it. Suggest removal of written.
<p>Response: The SDT thanks you for your comments. The SDT determined that determining alert levels falls outside the scope of a “communication protocol” and has removed the requirement to use Attachment 1 from the revised standard.</p>		
Santee Cooper	Disagree	Utilization of a color-coded system for all verbal and written Interoperability Communications adds a layer of complexity to the System Operator that is not necessary.
<p>Response: The SDT thanks you for your comments. The SDT determined that determining alert levels falls outside the scope of a “communication protocol” and has removed the requirement to use Attachment 1 from the revised standard.</p>		
South Carolina Electric and Gas	Agree	We agree with the proposal, however we feel that the color system should be evaluated to better distinguish the type of attack for example using P-YELLOW for physical vs. C-YELLOW for cyber instead of just "YELLOW" for both.
<p>Response: The SDT thanks you for your comments. The SDT determined that determining alert levels falls outside the scope of a “communication protocol” and has removed the requirement to use Attachment 1 from the revised standard.</p>		
NRECA RTF Members	Agree	We believe there is a need to use pre-defined system condition terminology and the ones provided in the attachment are easy to understand.
<p>Response: The SDT thanks you for your comments. Note that based on stakeholder comments, the team deleted the requirement. The SDT determined that determining alert levels falls outside the scope of a “communication protocol” and has removed the requirement to use Attachment 1 from the revised standard.</p>		
FirstEnergy	Disagree	We do not support R2 and its referenced attachment and feel that they should be removed. The requirement and attachment are too convoluted, create confusion among system operators, and not necessary with regard to the goal of this standard. This standard mandates proper three-part communication in all reliability-related communication (including alert level situations). Other standards should define and mandate rules associated with the specifics surrounding urgent action situations (i.e. CIP, TOP, EOP standards). Together these standards will arrive at proper communication between entities during alerts.
<p>Response: The SDT thanks you for your comments. The SDT determined that determining alert levels falls outside the scope of a “communication protocol” and has removed the requirement to use Attachment 1 from the revised standard.</p>		

Organization	Yes or No	Question 4 Comment
Electric Market Policy	Disagree	<p>We object due to the following reasons;</p> <p>1 - There are 3 versions of Attachment 1-COM-003-1 which is potentially confusing. We suggest separating into 3 attachments, one for each type of notification.</p> <p>2 - The level(s) identified in the notification text are at odds with the condition (color vs. numerical). It is suggested that the standard either use to Condition (color) or the level (numerical).</p> <p>3 - None of the Operating State Alert Levels in Attachment 1 appears to address Energy Emergency Alerts (EEAs). The note in the “Attachment 1-COM-003-1 defines normal, alert, and emergency operating conditions as they relate to Transmission Loading, Physical and Cyber Security. These definitions for Transmission Loading, Physical and Cyber Security Alert states align with the Emergency Energy Alert (EEA) states (as already described in NERC Reliability Standard EOP-002-2.1). The time frame for declaration of these Alert states shall be consistent with the approach used to declare EEAs and would normally apply to Real Time declarations and not forecast conditions.” This seems to limit use of Interoperability Communications to only events where there exists either a physical or cyber threat, or where an IROL can’t be mitigated. This emphasizes the confusion as described in item 2 above where the EEA levels in EOP-002-2.1 uses numerical values (i.e. EEA Level 1) without the colored conditions. We recommend adding a new section to Attachment 1 ‘Operating State Alert Levels’ as: ‘Reliability Coordinator Notifications for Energy Emergency Alerts.</p> <p>’4-Attachment 1 pertains specifically to Operating State Alert Levels and says nothing about the communication of information to be used to change the state or status of a BES element or facility (which is the SDT’s proposed definition of Interoperability Communications). Therefore, it is not appropriate to require that all verbal and written Interoperability Communications use the pre-defined terminology in Attachment 1.</p> <p>Only those communications concerning Operating State Alert Levels should be required to use that terminology. By the proposed definition, such communications are not Interoperability Communications since the information is not used to change the state or status of a BES element or facility. The SDT needs to revise this requirement to clarify that it pertains only to communicating the Operating State Alert Levels and nothing more.</p>

Response: The SDT thanks you for your comments. The SDT determined that determining alert levels falls outside the scope of a “communication protocol” and has removed the requirement to use Attachment 1 from the revised standard.

5. Requirement R4 of the draft COM-003-1 states, “Each Responsible Entity shall use Central Standard Time (24 hour format) as the common time zone for all verbal and written Interoperability Communications.” Do you agree with this proposal? If not, please explain in the comment area.

Summary Consideration:

The majority of commenters stated Requirement R4 would add confusion for the operators and decrease reliability. Some recommend the use of another time in place of Central Standard Time. In response, the OPCP SDT has modified the standard to use the 24 hour format (new 1.1.2) in all Operating Communications and the inclusion of a time zone reference (new 1.1.3) when Operating Communications occur between entities in different time zones.

There were also several comments of a general nature that indicated time zone issues as a non-factor for reliability. The OPCP SDT has modified the requirement to focus on Operating Communications in a format that it believes would increase reliability as it would reduce the potential for a miscommunication related to the desired time of a system operation.

Organization	Yes or No	Question 5 Comment
Bureau of Reclamation	Agree	
ExxonMobil Research and Engineering	Agree	
Georgia Transmission Corp	Agree	
Independent Electricity System Operator	Agree	
Old Dominion Electric Cooperative	Agree	
Oncor Electric	Agree	

Organization	Yes or No	Question 5 Comment
Delivery		
Sunflower Electric Power Corp.	Agree	
Westar Energy	Agree	
Santee Cooper	Disagree	A common time zone is not necessary and is overly prescriptive. Companies should not have to worry about self-reporting or receiving a compliance violation if someone states the wrong time during a conversation.
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT understands your concerns and is proposing an alternative requirement in the second draft of COM 003 which we believe will address your concerns. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communications an applicable entity must explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone.</p>		
American Electric Power	Disagree	AEP believes that the significant efforts and significant system changes necessary to support a common time zone does not provide a significant enough reliability benefit. In fact, the focus on a common time may divert attention away from more pressing operational reliability needs.
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT understands your concerns and is proposing an alternative requirement in the second draft of COM 003 which we believe will address your concerns. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communications an applicable entity shall explicitly state the time and time zone , and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone.</p>		
Electric Market Policy	Disagree	Any confusion about what time is being verbally communicated should be cleared up by three-part communications. There should be no confusion about what time is being communicated in writing as long as the time zone and AM\PM designation are included. Besides, many entities exchange written information via web-enabled applications that allow the users to configure their interface to show time in whatever format and time zone they prefer. This eliminates confusion. Operators will continue to use local time in their communications with field personnel, support staff, and management, and we see no demonstrable reliability-related need to require every operator in North America to have to convert their local time to CST in their communications with other operators. However, if the SDT feels a standard time must be adopted, it should be

Organization	Yes or No	Question 5 Comment
		GMT as this is the time that used by all 'true time' devices.
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT understands your concerns and is proposing an alternative requirement in the second draft of COM 003 which we believe will address your concerns. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communications an applicable entity shall explicitly state the time and time zone , and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone.</p>		
Manitoba Hydro	Disagree	<p>As per below.</p> <p>1)The 24 hour format will certainly reduce the confusion of AM and PM and at present seems to be the current best practice for all entities so should not be a major change.</p> <p>2)Examining the definition of “Interoperability Communications” means that there is and will be real time communications with entities in other times zones, thus it is assumed that this being an NERC standard is enforcing that all other time zones (PST, MST, EST) will be using CST when communicating with interoperability.</p> <p>a. If this is the case, it appears that the other time zones (PST, MST and EST) must make effort to modify their local time to synchronize with CST.</p> <p>b. This brings to point that when interoperability communication is used, this fact must be mentioned, instead of 13:53, it should be 13:53 CST.</p> <p>3) Adding CST to verbal time formats will be difficult to implement, so maybe a statement confirming the time zone should be appropriate each time interoperability communications is used when required. Conclusion: 24 hour format is fine, further clarify that all other time zones must use CST.</p>
<p>Response: The SDT thanks you for your comments. The second draft version of COM-003-1 eliminates the term “Interoperability Communication” and now proposes the term “Operating Communications” which is defined as communication of instruction to change or maintain the state, status, output, or input of an Element or Facility of the Bulk Electric System.</p> <p>The SDT is proposing an alternative requirement in the second draft of COM- 003 which we believe will address your concerns. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communications an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone.</p>		

Organization	Yes or No	Question 5 Comment
ATC and ITC	Disagree	ATC is in the Central Standard Time zone, and would not be directly impacted by this requirement. With that being said we are concerned that forcing an organization to refer to a time zone that is not local may result in an increase of errors and a decrease in reliability. See comments for question #3.
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT understands your concerns and is proposing an alternative requirement in the second draft of COM -003 which we believe will address your concerns. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communications an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone.</p> <p>Please see response to question #3.</p>		
British Columbia Transmission Corporation	Disagree	BCTC's position: as a majority of the Interoperability Communications is within our time zone there is no advantage in using Central Standard Time as this will only make the communications more difficult as both parties are required to change time, R4 is unreasonable.
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT understands your concerns and is proposing an alternative requirement in the second draft of COM- 003 which we believe will address your concerns. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communications an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone.</p>		
California Independent System Operator	Disagree	CAISO Comments; Any standardization of time zones, in order to enhance reliability or reduce costs would use GMT as the reference zone in our opinion. The use of Central Standard Time is problematic because some months of the year other time zones would be at the same time as CST (Eastern Daylight Savings Time) and others not. Adopting systems that require system operators to sometimes operate in a time zone that is not their own local time and sometimes to operate in a time zone that is equivalent to their own local time is standardization that is not actually standard. How does using Central Standard Time for all verbal and written communication improve or support reliability? The SDT needs to explain how this requirement provides an adequate level of reliability for real-time operations for any entity operating outside the Central Standard Time Zone.
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT understands your concerns and is proposing an alternative requirement in the second draft of COM -003 which we believe will address</p>		

Organization	Yes or No	Question 5 Comment
<p>your concerns. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communications an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone.</p>		
<p>New York State Reliability Council</p>	<p>Disagree</p>	<p>Comments: This requirement will burden those entities whose operations and communication needs are with other entities in the same time zone, which represents the overwhelming majority of all communications performed. It will increase the likelihood of errors for such entities. Further, some entities are operating both NERC BES elements and non-BES elements from the same control room. This requirement will significantly impact the efficiency and the safety of workers within those entities. NYSRC notes that R4 in the draft Standard does not match R2 in this question. Specifically the word ALL is not in the Standard.</p>
<p>Response: The SDT thanks you for your comments. The SDT understands your concerns and is proposing an alternative requirement in the second draft of COM -003 which we believe will address your concerns. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communication an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone.</p>		
<p>Consumers Energy</p>	<p>Disagree</p>	<p>Common Time Zone has been discussed for decades. There was little or no evidence a common time zone standard would have prevented any of the system disturbances experienced since 1996 let alone the blackout of 2003.</p>
<p>Response: The SDT thanks you for your comments. The SDT understands your concerns and is proposing an alternative requirement in the second draft of COM -003 which we believe will address your concerns. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communications an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone.</p>		
<p>Xcel Energy</p>	<p>Disagree</p>	<p>Do not agree with the requirement to use CST. By requiring the use of CST it may actually introduce an element of error for those who do not routinely operate in that time zone and must make mental corrections for the time zone they are in. Additionally, some agreements already exist that stipulate what time zone is to be used.</p>
<p>Response: The SDT thanks you for your comments. The SDT understands your concerns and is proposing an alternative requirement in the second draft of COM- 003 which we believe will address</p>		

Organization	Yes or No	Question 5 Comment
<p>your concerns. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communications an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone.</p>		
<p>NextEra Energy Resources, LLC</p>	<p>Disagree</p>	<p>Existing market and reliability communication methods already ensure that time-zone adjustments occur. It is critical that the feasibility, impact, and logistical aspects of implementing this change be rigorously reviewed and understood to inform this standard’s development. Conceivably, the result of that analysis could expose significant risks outweighing the purported benefits of implementing a single time-zone policy. Any implementation or transition gaps between the time format and references used by reliability coordinators, their corresponding systems, and the interfaced systems of market participants would be extremely detrimental to system stability and ongoing market operations.</p>
<p>Response: The SDT thanks you for your comments. The SDT understands your concerns and is proposing an alternative requirement in the second draft of COM- 003 which we believe will address your concerns. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communications an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone.</p>		
<p>Transmission Owner</p>	<p>Disagree</p>	<p>Existing market and reliability communication methods already ensure that time-zone adjustments occur. It is critical that the feasibility, impact, and logistical aspects of implementing this change be rigorously reviewing and understood to inform this standard’s development. Any implementation or transition gaps between the time format and references used by reliability coordinators, their corresponding systems, and the interfaced systems of market participants would be extremely detrimental to system stability and ongoing market operations.</p>
<p>Response: The SDT thanks you for your comments. The SDT understands your concerns and is proposing an alternative requirement in the second draft of COM -003 which we believe will address your concerns. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communications an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone.</p>		
<p>Sunflower Electric Power Corporation</p>	<p>Agree</p>	<p>General question will time follow central prevailing time (standard/daylight savings)?</p>

Organization	Yes or No	Question 5 Comment
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT understands your concerns and is proposing an alternative requirement in the second draft of COM -003 which we believe will address your concerns. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communications an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, and include whether the time is standard or daylight saving when communicating with one or more entities in a different time zone.</p>		
<p>Hydro-Québec TransEnergie</p>	<p>Disagree</p>	<p>HQT agrees with using 24 hour format.</p> <p>However, there is no reliability need to use a common time zone for communications. There is already a requirement to use hour ending for scheduling purposes, inadvertent accounting, CPS and other standards where needed. There is no additional reliability need to use a common time zone.</p> <p>The time zone should be identified in the communication. Not only does this requirement attempt to determine HOW entities operate within their various footprints, it would significantly change the way many markets are structured. To implement this into existing Markets would cost significant time, money and resources while not enhancing reliability in these areas. When operating across time-zones, simply referencing “Central Standard Time” or “Eastern Standard Time” is sufficient for operating entities to reliably operate. The time zone adopted by the respective Reliability Coordinator (RC) and their area control center, e.g., NYISO Eastern Standard Time (EST), should be used. If each entity in the area and the RC are all using EST (or daylight savings), then why would a time zone be used that is foreign to all parties in the area? This can lead to considerable confusion. What cannot be ignored is how many entities would have to modify their existing practices, hardware, software, Control System, billing systems, bidding systems, etc.</p> <p>We are strongly opposed to this requirement. The requirement should be that those entities which need to communicate and are in different time zones define which time they will use for communications</p> <p>.Any confusion about what time is being verbally communicated should be cleared up through three-part communications. There should be no confusion about what time is being communicated as long as the time zone (where applicable), and the 24 hour format designations are included. Besides, many entities exchange written information via web-enabled applications that allow the users to configure their interface to show time in whatever format and time zone they prefer. This eliminates confusion.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT understands your concerns and is proposing an alternative requirement in the second draft of COM -003 which we believe will address your concerns. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating</p>		

Organization	Yes or No	Question 5 Comment
<p>Communications an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone.</p>		
NIPSCO	Agree	I believe we call this "system time" in our area
<p>Response: The SDT thanks you for your comments. Many stakeholders proposed modifications to the standard – and the SDT revised the standard to only require inclusion of time and time zone when communicating with one or more entities in a different time zone.</p>		
E.ON U.S. LLC	Disagree	<p>If it is the intent that the requirements of this standard apply not only to control room operators but field personnel (line crews, substation crews, etc.) then E ON US is not in favor of using a common time zone nation-wide. The confusion that this change could create in real-time operations outweighs the BES reliability benefit E.ON US would also like clarification that this requirement does not apply to control systems or elements thereof that may log equipment operations. The background information above suggests this possible interpretation.</p>
<p>Response: The SDT thanks you for your comments. This does include communications that involve field personnel.</p>		
We Energies	Disagree	<p>If requiring one standard time zone, it would seem prudent to specify Greenwich Mean Time (GMT) as a universal standard. That being said, solely utilizing Central Standard Time (CST), or even GMT, as the common time zone may cause undue confusion given that MISO and PJM already operate with established processes and systems that are inconsistent with this, and are based on their own market timing. In addition, many plant personnel and procedures already have a long and engrained history of successful operation under existing timing directions, which are not aligned with market timing. Forcing every plant across multiple time zones to establish a new standard ignores the need for cases of special consideration and historical circumstances. The potential confusion due to the forced timing standard across many entities within a given area is too high a price to pay for the possible clarity by a limited few due to the switch to CST. A preferred alternative would include focusing the standard on requiring very clear communication of the time zone being specified for a given Reliability Directive. Thus, compliance enforcement would only pertain to Reliability Directives.</p>
<p>Response: The SDT thanks you for your comments. The SDT understands your concerns and is proposing an alternative requirement in the second draft of COM- 003 which we believe will address your concerns. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communications an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone. This requirement would apply to verbal and written “Operating</p>		

Organization	Yes or No	Question 5 Comment
<p>Communications” as defined in the current draft of the standard. If you are a responsible entity as defined in the requirement then it is applicable.</p>		
<p>The Empire District Electric Company</p>	<p>Disagree</p>	<p>In dealing in real time, what possible benefit can be had by this requirement? I see this requirement benefitting NERC analysis after the fact and can lead to more operating mistakes in real time than it benefits. If a situation is occurring in real time and two entities are in communication with each other, the requirement of a common time zone holds no benefit.</p>
<p>Response: The SDT thanks you for your comments. The SDT understands your concerns and is proposing an alternative requirement in the second draft of COM- 003 which we believe will address your concerns. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communications an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone.</p>		
<p>American Municipal Power</p>	<p>Disagree</p>	<p>In other large industries one time zone is usually picked, and the time zone that is usually picked is the EST zone (JP Morgan Chase is an example). I feel that picking a standard time zone is very important, but I have not seen significantly good arguments to use CST. EST, on the other hand, is where the majority of the load for the electric industry resides. I suggest changing the standard to EST but with the 24 hour format.</p>
<p>Response: The SDT thanks you for your comments. The SDT understands your concerns and is proposing an alternative requirement in the second draft of COM- 003 which we believe will address your concerns. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communications an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone.</p>		
<p>NERC Staff</p>	<p>Disagree</p>	<p>In the “Background Information” section of this Comment Form, you state, “The SDT believes that Interoperability Communications would be enhanced with the use of a common time zone. Central Standard Time was chosen as it is already in use for NERC Time Error Corrections. The Blackout Report cited the need to tighten communication protocols and the SAR includes consideration of a common time zone to minimize mismatched time signature issues between control systems especially during an emergency.”NERC staff would like to see more detailed justification on how reliability would be enhanced with this requirement. This appears to solve issues for communications between time zones, but may add additional confusion for all additional communications that exist within a common time zone.</p>

Organization	Yes or No	Question 5 Comment
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT understands your concerns and is proposing an alternative requirement in the second draft of COM -003 which we believe will address your concerns. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communications an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone.</p> <p>The OPCP SDT believes that any critical element to an Operating Communication (time, ordered action, clear understanding by all parties) must be governed by protocols that reduce the risk of communicating a misunderstood message. A misunderstood message increases the risk of a mishap which could destabilize the BES by creating an improper circuit arrangement. The time an event is supposed to occur in a sequence is critical. If a sender gives a time in EST and the receiver interprets it as CST the risk of a mishap that will affect reliability (not to mention people and equipment) increases dramatically.</p>		
<p>Progress Energy Carolina, Inc</p>	<p>Disagree</p>	<p>Mandating that all “Interoperability Communications” be based on Central Standard Time could generate an error precursor- (i.e. some entity communicating a reliability directive in a location using EST to a different entity in a location using EST having to convert the time stamp to CST introduces possibilities of errors and/or delays.) A better approach for those entities that communicate across time zones is for those entities to agree/coordinate on a time standard reference.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT understands your concerns and is proposing an alternative requirement in the second draft of COM -003 which we believe will address your concerns. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communication an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone.</p>		
<p>NorthWestern Energy</p>	<p>Disagree</p>	<p>NorthWestern appreciates the opportunity to comment. We believe the requirement to use Central Standard Time will cause unnecessary confusion (translating to a different time zone and possibly to a different time reckoning - standard or daylight) at a time when the need for clarity is critical. NorthWestern suggests that each entity use their local time zone when issuing switching orders. Each entity should state the time zone they are using when giving any time reference (e.g., 15:20 Mountain Daylight Time) if necessary.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT understands your concerns and adopted your suggestion. In the second draft of COM 003, instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communications an applicable entity shall explicitly state the time</p>		

Organization	Yes or No	Question 5 Comment
<p>and time zone when communicating with one or more entities in a different time zone.</p>		
PEF	Disagree	PEF feels that the use of CST will create too much confusion within the different entities, particularly during emergency communications. We recommend the use of GMT instead.
<p>Response: The SDT thanks you for your comments. The SDT understands your concerns and is proposing an alternative requirement in the second draft of COM -003 which we believe will address your concerns. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communication an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone.</p>		
Pepco Holdings, Inc. - Affiliates	Disagree	PHI believes that mandating one time zone for all Interoperability Communications will create more confusion during an emergency that it will prevent and may contribute to increased reliability issues.
<p>Response: The SDT thanks you for your comments. The SDT understands your concerns and is proposing an alternative requirement in the second draft of COM- 003 which we believe will address your concerns. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communications an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone.</p>		
Southern Company Transmission	Disagree	Southern Company supports the SERC SOS comments. SERC SOS comments: We feel that this requirement of a common time zone is overly prescriptive. The requirement should be that entities operating in different time zones agree on how to best eliminate any confusion regarding the time difference. Entities that routinely operate in different time zones already have an effective system for dealing with time differences. There seems to be no incentive to change a system that already works quite well, and the cost of updating computer systems could prove prohibitive. This group feels that mandating a common time zone across all of North America can only lead to confusion and increased reliability issues.
<p>Response: The SDT thanks you for your comments. The SDT understands your concerns and is proposing an alternative requirement in the second draft of COM- 003 which we believe will address your concerns. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communication an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone.</p>		

Organization	Yes or No	Question 5 Comment
PSEG Companies	Disagree	The PSEG Companies agree with the concerns expressed in the comments filed by the PJM System Operations Subcommittee (SOS) Group.
<p>Response: The SDT thanks you for your comments. The SDT understands your concerns and is proposing an alternative requirement in the second draft of COM 003 which we believe will address your concerns. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communications an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone.</p>		
Puget Sound Energy	Disagree	The requirement for common time zone should be at the discretion of the Reliability Coordinator in the respective region to determine. The conversion to CST has no apparent value. It would be much more reasonable to require communications related to time to include the time zone used in that communication. If common time zone across the nation is required it should only be imposed on the RCs as they would communicate with each other more readily than entities to other national entities. If an entity does not operate within the CST, the need to convert during periods of stress may increase the potential for error and reduce reliability.
<p>Response: The SDT thanks you for your comments. The SDT understands your concerns and is proposing an alternative requirement in the second draft of COM -003 which we believe will address your concerns. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communications an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone.</p>		
PacifiCorp	Disagree	The sole use of Central Standard time would add confusion to the for Interoperability communication Communications process that would detract would have the unintended consequence of creating more confusion, particularly during emergency communications. While PacifiCorp appreciates the need for minimizing mis-matched time signatures between control systems, it believes that mandating one time zone for all Interoperability Communications will create more confusion during an emergency that it will prevent.
<p>Response: The SDT thanks you for your comments. The SDT understands your concerns and is proposing an alternative requirement in the second draft of COM- 003 which we believe will address your concerns. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communications an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone.</p>		

Organization	Yes or No	Question 5 Comment
National Grid	Disagree	The use of central time is unnecessary and may cause more confusion when converting times. The requirement should be that those entities which need to communicate and are in different time zones, define which time they will use for communications.
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT understands your concerns and is proposing an alternative requirement in the second draft of COM -003 which we believe will address your concerns. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communications an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone.</p>		
IRC Standards Review Committee	Disagree	There is no need to use a common time zone for communications. There is already a requirement to use hour ending for scheduling purposes, inadvertent accounting, CPS and other standards where needed. There is no demonstrated benefit to reliability to use a common time zone. The time zone should be identified in the communication. Use of CST will cause significant and unnecessary costs and the resulting reliability benefit is not clear. Some of the costs will arise to change systems such as RCIS, IDC, scheduling and E-Tag systems, etc. Not only does this requirement attempt to determine HOW entities operate within their various footprints, it would significantly change the way many markets are structured. To implement this into existing Markets would cost significant time, money and resources while not enhancing reliability in these areas. We believe that, when operating across time-zones, simply referencing “Central Standard Time” or “Eastern Standard Time” is sufficient for other operating entities to reliably operate; also, let’s not lose sight of HOW MANY entities would have to modify their existing practices, hardware, software, Control System, billing systems, bidding systems, etc. We are strongly opposed to this requirement.
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT understands your concerns and adopted your suggestion for including the time zone in communications that involve communicating with one or more entities in a different time zone.</p>		
ISO New England Inc.	Disagree	There is no need to use a common time zone for communications. There is already a requirement to use hour ending for scheduling purposes, inadvertent accounting, CPS and other standards where needed. There is no demonstrated benefit to reliability to use a common time zone. The time zone should be identified in the communication. Use of CST will cause significant and unnecessary costs and the resulting reliability benefit is not clear. Some of the costs will arise to change systems such as RCIS, IDC, scheduling and E-Tag systems, etc.

Organization	Yes or No	Question 5 Comment
		<p>Not only does this requirement attempt to determine HOW entities operate within their various footprints, it would significantly change the way many markets are structured. To implement this into existing Markets would cost significant time, money and resources while not enhancing reliability in these areas. We believe that, when operating across time-zones, simply referencing “Central Standard Time” or “Eastern Standard Time” is sufficient for other operating entities to reliably operate; also, let’s not lose sight of HOW MANY entities would have to modify their existing practices, hardware, software, Control System, billing systems, bidding systems, etc. We, and our members, are strongly opposed to this requirement.</p>
<p>Response: The SDT thanks you for your comments. The SDT understands your concerns and adopted your suggestion for including the time zone in communications that involve communicating with one or more entities in a different time zone.</p>		
<p>Indiana Municipal Power Agency</p>	<p>Disagree</p>	<p>There is no need to use a common time zone. The time zone should be identified in the communication, if needed. The reliability benefit is not clear for using one time zone, and the cost associated with using one time zone will be significant and unnecessary.</p> <p>The use of just CST will cause confusion, because one ISO has all its systems in EST and another ISO systems has its systems in EPT. If an entity is required to use CST when verbally communicating to one or both of these two ISOs, then many mistakes and confusion will result because their portals continue to be in their respective times.</p>
<p>Response: The SDT thanks you for your comments. The SDT understands your concerns and adopted your suggestion for including the time zone in communications that involve communicating with one or more entities in a different time zone.</p>		
<p>Dynegy</p>	<p>Disagree</p>	<p>There is no reliability need to use a common time zone for communications. There is already a requirement to use hour ending for scheduling purposes, inadvertent accounting, CPS and other standards where needed. The time zone should be identified in the communication. Use of CST in all time zones will actually cause confusion and significant and unnecessary costs with no foreseeable reliability benefit. Some of the costs will arise to change systems such as RCIS, IDC, scheduling and E-Tag systems, etc.</p>
<p>Response: The SDT thanks you for your comments. The SDT understands your concerns and adopted your suggestion for including the time zone in communications that involve communicating with one or more entities in a different time zone.</p>		
<p>Great River Energy</p>	<p>Disagree</p>	<p>There is no reliability need to use a common time zone for communications. The prevailing time zone should be used to avoid confusion between operating staff and field personnel. Use of CST will actually cause</p>

Organization	Yes or No	Question 5 Comment
		confusion with no foreseeable reliability benefit.
<p>Response: The SDT thanks you for your comments. The SDT understands your concerns and is proposing an alternative requirement in the second draft of COM 003 which we believe will address your concerns. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communications an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone.</p>		
Kansas City Power & Light	Disagree	<p>There is no reliability need to use a common time zone for communications. There is already a requirement to use hour ending for scheduling purposes, inadvertent accounting, CPS and other standards where needed. There is no additional reliability need to use a common time zone. The time zone should be identified in the communication. Use of CST will actually cause confusion and significant, unnecessary costs with no foreseeable reliability benefit. Some of the costs will arise to change systems such as RCIS, IDC, scheduling and E-Tag systems, etc.</p>
<p>Response: The SDT thanks you for your comments. The SDT understands your concerns and adopted your suggestion for including the time zone in communications that involve communicating with one or more entities in a different time zone.</p>		
Midwest ISO Standards Collaborators	Disagree	<p>There is no reliability need to use a common time zone for communications. There is already a requirement to use hour ending for scheduling purposes, inadvertent accounting, CPS and other standards where needed. There is no additional reliability need to use a common time zone. The time zone should be identified in the communication. Use of CST will actually cause confusion and significant, unnecessary costs with no foreseeable reliability benefit. Some of the costs will arise to change systems such as RCIS, IDC, scheduling and E-Tag systems, etc.</p>
<p>Response: The SDT thanks you for your comments. The SDT understands your concerns and adopted your suggestion for including the time zone in communications that involve communicating with one or more entities in a different time zone.</p>		
Northeast Power Coordinating Council	Disagree	<p>There is no reliability need to use a common time zone for communications. There is already a requirement to use hour ending for scheduling purposes, inadvertent accounting, CPS and other standards where needed. There is no additional reliability need to use a common time zone. The time zone should be identified in the communication. Not only does this requirement attempt to determine HOW entities operate within their various footprints, it would significantly change the way many markets are structured. To implement this into existing Markets would cost significant time, money and resources while not enhancing reliability in these areas. When operating across time-zones, simply referencing “Central Standard Time” or “Eastern Standard</p>

Organization	Yes or No	Question 5 Comment
		<p>Time” is sufficient for operating entities to reliably operate. The time zone adopted by the respective Reliability Coordinator (RC) and their area control center, e.g., NYISO Eastern Standard Time (EST), should be used. If each entity in the area and the RC are all using EST (or daylight savings), then why would a time zone be used that is foreign to all parties in the area? This can lead to considerable confusion. What cannot be ignored is how many entities would have to modify their existing practices, hardware, software, Control System, billing systems, bidding systems, etc. We are strongly opposed to this requirement. The requirement should be that those entities which need to communicate and are in different time zones define which time they will use for communications. Any confusion about what time is being verbally communicated should be cleared up through three-part communications. There should be no confusion about what time is being communicated as long as the time zone (where applicable), and the 24 hour format designations are included. Besides, many entities exchange written information via web-enabled applications that allow the users to configure their interface to show time in whatever format and time zone they prefer. This eliminates confusion.</p>
<p>Response: The SDT thanks you for your comments. The SDT understands your concerns and adopted your suggestion for including the time zone in communications that involve communicating with one or more entities in a different time zone.</p>		
Northeast Utilities	Disagree	<p>There is no reliability need to use Central Standard Time (CST) a common time zone for communications. Eastern Standard Time (EST) is used in New England and within the NPCC region. Converting to a different time zone will be confusing to the operators and the field personnel. The time zone that will be used should be agreed between each operating entity. This should only impact those entities that cross two time zones. If NERC or a Region were to perform an investigation that involves entities across the eastern interconnection, it would be appropriate for the investigation team to request data using a specific time zone.</p>
<p>Response: The SDT thanks you for your comments. The SDT understands your concerns and is proposing an alternative requirement in the second draft of COM- 003 which we believe will address your concerns. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communications an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone.</p>		
Western Area Power Administration	Disagree	<p>This could be a potential problem since Operators will need to communicate with field personnel and local utilities in their local applicable time zone. It could be confusing to communicate by referring to a different time zone in other instances. It seems like it would make more sense to require that the time zone being used in a communication must be specifically and clearly referred to and identified. It doesn't matter so much</p>

Organization	Yes or No	Question 5 Comment
		WHICH time zone is used, it just matters that everyone understands which one is being used.
<p>Response: The SDT thanks you for your comments. The SDT understands your concerns and is proposing an alternative requirement in the second draft of COM -003 which we believe will address your concerns. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communications an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone.</p>		
Bonneville Power Administration	Disagree	This creates a communication barrier between the utility and its customers and the local population. Do not go ahead with this provision. The very last thing that we want to do is to create confusion and this approach, given that the country itself is using different time zones, will do just that. With 3-part communications with specified time zones in Interoperability Communications as required and a common English language, the matter is covered.
<p>Response: The SDT thanks you for your comments. The SDT understands your concerns and is proposing an alternative requirement in the second draft of COM- 003 which we believe will address your concerns. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communications an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone.</p>		
Entergy Services	Disagree	This is also a “how” requirement and not a “what” requirement. If the industry believes that confusion exists pertaining to what time zone different entities are referring to in written and verbal communications, the requirement should be focused on ensuring clear communication of time zone information is included in verbal and written communication. Forcing entities to change to any one time zone will impose significant effort and expense without a measurable improvement in reliability. However, Entergy is not aware that reliability issues have occurred as a result of entities communicating in written or verbal format in different time zones. Entergy proposes that this requirement be removed from the standard.
<p>Response: The SDT thanks you for your comments. The SDT understands your concerns and adopted the suggestion for including the time zone in communications that involve communicating with one or more entities in a different time zone.</p>		
ERCOT ISO	Disagree	This is an administrative task and prescribes how something should be done. Written Interoperability Communications are typically done through automated systems, in which time zone conversion should not be an issue. Verbal communication should be thorough enough to confirm the conversion. If the industry is in favor of this requirement, then perhaps consideration should be to use Central Prevailing Time to alleviate potential confusion with changes with Daylight Savings Time.

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<p>Response: The SDT thanks you for your comments. The SDT understands your concerns and is proposing an alternative requirement in the second draft of COM- 003 which we believe will address your concerns. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communications an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone.</p>		
PPL	Disagree	This requirement is overly prescriptive and the benefit to reliability by switching everyone to CST is unclear.
<p>Response: The SDT thanks you for your comments. The SDT revised COM-003 so that instead of requiring the use of a single continent-wide time zone, the revised standard now requires that during Operating Communications an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone.</p>		
Power South Energy	Disagree	This requirement will be too confusing and could lead to compliance violations because someone stated the wrong time during the conversation.
<p>Response: The SDT thanks you for your comments. The SDT understands your concerns and is proposing an alternative requirement in the second draft of COM- 003 which we believe will address your concerns. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communications an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone.</p>		
Long Island Power Authority	Disagree	This requirement will burden those entities whose operations and communication needs are with other entities in the same time zone, which represents the overwhelming majority of all communications performed. It will increase the likelihood of errors for such entities. Further, some entities are operating both NERC BES elements and non-BES elements from the same control room. This requirement will significantly impact the efficiency and the safety of workers within those entities. LIPA notes that R4 in the draft Standard does not match R2 in this question. Specifically the word ALL is not in the Standard.
<p>Response: The SDT thanks you for your comments. The SDT understands your concerns and is proposing an alternative requirement in the second draft of COM- 003 which we believe will address your concerns. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communications an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone.</p>		
NYSEG	Disagree	Unless the communication is across time zones, there is no benefit to using Central Standard Time, nor is it sensible. Entire system infrastructures and business processes are driven by current, local standard time and it is far more safe, reliable, and practical to use the established current time for system operations. If there is a

Organization	Yes or No	Question 5 Comment
		<p>compelling need for definitive time notation across time zones then the requirement should dictate the addition of the time zone when referring to a specific clock time (i.e., 1400 CST, 1400 EST, 1400 ED[aylight]T, etc.).</p>
<p>Response: The SDT thanks you for your comments. The SDT understands your concerns and is proposing an alternative requirement in the second draft of COM- 003 which we believe will address your concerns. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communication an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone. Your recommendation is the genesis of the proposal we have developed in the standard.</p>		
<p>Orange and Rockland Utilities, Inc.</p>	<p>Disagree</p>	<p>Use of the CST time format would present significant challenges as expressed in the comments of question #3 listed above.</p>
<p>Response: The SDT thanks you for your comments. The SDT understands your concerns and is proposing an alternative requirement in the second draft of COM- 003 which we believe will address your concerns. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communications an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone. Please see responses to Question#3 comments above as well.</p>		
<p>FirstEnergy</p>	<p>Disagree</p>	<p>Using a specific time zone that is subject to adjustments for daylight savings introduces additional complexity for an operator and has potential to introduce additional reliability issues. A significant portion of the Eastern Interconnection transmission operators have dealings with entities that do not span multiple time zones and are solely within the Eastern Time Zone. We do not feel that it is appropriate for this standard to mandate how time is communicated during three-part communication. Operating communication can deal with several different subjects and data during a conversation, and it would be inappropriate to mandate all the possible subjects and data through standard requirements. As a best practice, and not as a mandated requirement, it would be appropriate for operators to state the time zone they are in if necessary for the situation or if requested by an entity.</p>
<p>Response: The SDT thanks you for your comments. The SDT understands your concerns and is proposing an alternative requirement in the second draft of COM -003 which we believe will address your concerns. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communications an applicable entity shall explicitly state the time and time zone, and indicate</p>		

Organization	Yes or No	Question 5 Comment
<p>whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone.</p>		
Ameren	Disagree	<p>We agree that all inter-entity operability communication should be on common time zone but if said communication includes routine dispatch instructions several RTOs use EST time for market operations, would they then need to change to CST? And while CST seems to have some value because it is used for time error, wouldn't it make more sense to use UTC? It is a world standard and has the benefit of not being associated with daylight savings times as Central time does (may be confusion at some times between CST and CDT)</p>
<p>Response: The SDT thanks you for your comments. The SDT understands your concerns and is proposing an alternative requirement in the second draft of COM -003 which we believe will address your concerns. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communications an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone.</p>		
NRECA RTF Members	Disagree	<p>We believe that adding the Central Time zone requirement for all verbal and written Interoperability Communications is unnecessary. For these type of activities there should already be accurate time stamps from equipment such as RTUs, EMS systems etc... for record keeping and documentation activities. In the future, with the implementation of Smart Grid technologies, time stamping will be included in the developed platforms for such technology, therefore, reducing the much of the time stamping errors. Because many of the actions required for Interoperability Communications, are completed by field personnel this requirement is onerous. It could potentially impact reliability since the field personnel might be more focused on documenting the correct time zone, for compliance to the requirement and the potential impact for non-compliance, than completing the required task safely and accurately. If time-stamping is an issue in event analysis, it might be more appropriate that Central Standard Time be utilized by recording devices such as RTUs, EMS systems etc... not for the actual verbal and written communications. In addition, how will daylight savings time be addressed in the proposed requirement of this standard?</p>
<p>Response: The SDT thanks you for your comments. The SDT understands your concerns and is proposing an alternative requirement in the second draft of COM -003 which we believe will address your concerns. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communication an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone and indicate whether the time is daylight saving or standard.</p>		
Florida Municipal Power Agency	Disagree	<p>We believe that any time zone can be used as long as the parties come to a common understanding of time through communication. Also, if an Entity mistakenly starts off a conversation using a time other than Central</p>

Organization	Yes or No	Question 5 Comment
(FMPPA) and some members		Standard Time, but corrects themselves during the 3-part communication process, is that a violation? We believe not, that as long as the communicating entities come to a common understanding of time, there is no violation. More clarity on this is desired. We assume such opportunity to correct mistakes is present throughout the standard and the language of the standard ought to reflect that. A high VRF is not appropriate, especially if the parties involved in the communication have a common understanding of the time, who cares what time zone?
<p>Response: The SDT thanks you for your comments. The SDT understands your concerns and is proposing an alternative requirement in the second draft of COM -003 which we believe will address your concerns. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communications an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone.</p>		
MRO NERC Standards Review Subcommittee	Disagree	We believe that requiring the use of Central Standard Time (CST) in the Operating Arena (Real-Time) would reduce the level of reliability on a real-time basis. We understand that one of the primary reasons for going to one time zone is to aid in Event Analysis. It is our belief that during the analysis of an event, there is adequate time to make the necessary adjustments for time zones. The Group performing the analysis could require all data being submitted be in one time zone as the basis. Requiring the use of CST is an added burden to the Operations Staff in real-time that does not help them.
<p>Response: The SDT thanks you for your comments. The SDT understands your concerns and is proposing an alternative requirement in the second draft of COM -003 which we believe will address your concerns. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communications an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone.</p>		
Transmission System Operations	Disagree	We believe that the use of Central Standard Time in non-CST areas would create confusion between the Reliability Coordinator, Transmission Operator, Transmission Owner, Generator Operators, and field personnel.
<p>Response: The SDT thanks you for your comments. The SDT understands your concerns and is proposing an alternative requirement in the second draft of COM -003 which we believe will address your concerns. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communications an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone.</p>		
Duke Energy	Disagree	We don't agree with this requirement because it would introduce confusion into communications, especially in all communications other than RC to RC. RC's already have protocols in place to deal with time zone

Organization	Yes or No	Question 5 Comment
		differences, and changing that and applying it to all entities would create reliability errors. We think that this is “a solution in search of a problem”.
<p>Response: The SDT thanks you for your comments. The SDT understands your concerns and is proposing an alternative requirement in the second draft of COM- 003 which we believe will address your concerns. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communications an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone.</p>		
PJM	Disagree	We feel that this requirement of a common time zone is overly prescriptive. The requirement should be that entities operating in different time zones agree on how to best eliminate any confusion regarding the time difference. Entities that routinely operate in different time zones already have an effective system for dealing with time differences. There seems to be no incentive to change a system that already works quite well, and the cost of updating computer systems could prove prohibitive. This group feels that mandating a common time zone across all of North America can only lead to confusion and increased reliability issues.
<p>Response: The SDT thanks you for your comments. The SDT understands your concerns and is proposing an alternative requirement in the second draft of COM- 003 which we believe will address your concerns. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communications an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone.</p>		
PJM SOS Comments	Disagree	We feel that this requirement of a common time zone is overly prescriptive. The requirement should be that entities operating in different time zones agree on how to best eliminate any confusion regarding the time difference. Entities that routinely operate in different time zones already have an effective system for dealing with time differences. There seems to be no incentive to change a system that already works quite well, and the cost of updating computer systems could prove prohibitive. This group feels that mandating a common time zone across all of North America can only lead to confusion and increased reliability issues.
<p>Response: The SDT thanks you for your comments. The SDT understands your concerns and is proposing an alternative requirement in the second draft of COM- 003 which we believe will address your concerns. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communications an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone.</p>		
SERC OC&SOS Standards Review	Disagree	We feel that this requirement of a common time zone is overly prescriptive. The requirement should be that entities operating in different time zones agree on how to best eliminate any confusion regarding the time

Organization	Yes or No	Question 5 Comment
Group		<p>difference. Entities that routinely operate in different time zones already have an effective system for dealing with time differences. There seems to be no incentive to change a system that already works quite well, and the cost of updating computer systems could prove prohibitive. For instance, the requirement to use the central time zone for logging the time of an alert is problematic in that all communication tools, such as the RCIS, will need to be re-vamped. We question whether there will be a measurable reliability benefit by so doing. This group feels that mandating a common time zone across all of North America can only lead to confusion and increased reliability issues.</p>
<p>Response: The SDT thanks you for your comments. The SDT understands your concerns and is proposing an alternative requirement in the second draft of COM- 003 which we believe will address your concerns. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communications an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone.</p>		
South Carolina Electric and Gas	Disagree	<p>We feel that time zones should be consistent throughout all standards and regulatory reporting requirements(e.g. TADS)</p>
<p>Response: The SDT thanks you for your comments. The SDT understands your concerns and is proposing an alternative requirement in the second draft of COM- 003 which we believe will address your concerns. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communications an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone.</p>		
Tri-State Generation & Transmission Assoc.	Disagree	<p>We have been operating within our individual time zones for many years without incident. Modifying the time zone to which we operate will pose additional confusion and add unnecessary risk in operating the BES.</p>
<p>Response: The SDT thanks you for your comments. The SDT understands your concerns and is proposing an alternative requirement in the second draft of COM- 003 which we believe will address your concerns. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communications an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone.</p>		
Pacific Northwest Small Utilities Comment Group	Disagree	<p>While our utilities agree that understanding the actual time is important, stating the time zone and summer offset (13:34 PDT) should suffice. As an alternative, UTC might be used since it is clearly distinguishable from local time in all of NERC.</p> <p>As in R1, LSEs and DPs should be removed from this Requirement.</p>

Organization	Yes or No	Question 5 Comment
		<p>Response: The SDT thanks you for your comments. The SDT understands your concerns and is proposing an alternative requirement in the second draft of COM- 003 which we believe will address your concerns. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communications an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone.</p> <p>The SDT reviewed the SAR and has removed TSPs and LSEs as applicable entities; however DPs were included as applicable entities and have been retained in COM-003-1. The specified role of the DP to shed load justifies the retention of the DP as an applicable entity.</p>

6. Requirement R5 of the draft COM-003-1 states, “Each Responsible Entity shall use Three-part Communications when issuing a directive during verbal Interoperability Communications.” Do you agree with this proposal? If not, please explain in the comment area.

Summary Consideration:

Most stakeholders who responded to this question disagreed with the proposed Requirement R5.

Many commenters offered differing recommendations on R5 regarding the application and definition of “Reliability Directive.” The proposed term “Reliability Directive” is being developed by the RC SDT for Project 2006-06, and the OPCP SDT has not utilized this term in the first or second drafts of COM- 003-1.

Many commenters recommended splitting proposed Requirement R5 to recognize the two distinct parties (sending and receiving) in a three part communication process. The OPCP SDT has done so by separating what had been R5 into two requirements – R2 for the sender and R3 for the receiver of an oral, person-to-person “Operating Communication.”

Some commenters expressed concerns regarding potential audit citations if a repeat-back was not word-for-word or verbatim. The OPCP SDT modified the standard, adding “not necessarily verbatim” to address the concern. In other words, communication is acceptable as long as the communication is clear and accurately conveys the Operating Communication and its substantive components.

The Quality Review team recommended that the OPCP SDT modify Requirements R2 and R3 to clarify that these requirements for performance of three-part communication exclude Reliability Directives. This eliminates the double jeopardy issue that may have existed if both COM-002 and COM-003 were approved.

Thus – the revised COM-003 does include the term, Reliability Directive. In addition, the implementation plan was revised to no longer recommend retirement of COM-002. As modified, the two standards can exist without conflict. COM-002 requires the issuer of an Operating Communication to identify that communication as a “Reliability Directive” which gives recipients notice that the directive is associated with an “Emergency”. COM-003 now specifically identifies that the requirements for thee part communication do not include “Reliability Directives.”

Per Standards Committee guidance, the SDT did not revise all the responses in this report that indicate COM-003 does not include the term, “Reliability Directive” nor did the team revise all the responses that indicated the team recommended retirement of COM-002.

Organization	Yes or No	Question 6 Comment
Ameren	Agree	
British Columbia Transmission Corporation	Agree	

Consideration of Comments on OPCP SDT — Project 2007-02

Organization	Yes or No	Question 6 Comment
Bureau of Reclamation	Agree	
Consumers Energy	Agree	
ExxonMobil Research and Engineering	Agree	
Kansas City Power & Light	Agree	
NorthWestern Energy	Agree	
Old Dominion Electric Cooperative	Agree	
Oncor Electric Delivery	Agree	
Orange and Rockland Utilities, Inc.	Agree	
PacifiCorp	Agree	
PEF	Agree	
Sunflower Electric	Agree	

Organization	Yes or No	Question 6 Comment
Power Corp.		
Sunflower Electric Power Corporation	Agree	
Westar Energy	Agree	
Western Area Power Administration	Agree	
Pepco Holdings, Inc. - Affiliates	Disagree	As mentioned in Question 1 above, the term Reliability Directive has been defined in the draft standard COM-002-3 and should be considered in place of Interoperability Communication since the directive is specific to emergency operations. PHI recommends that the requirement changed to read “Each responsible entity shall use Three Part Communication when issuing or receiving a Reliability Directive”.
<p>Response: The SDT thanks you for your comments. The current draft version of COM-003-1 eliminates the term “Interoperability Communication” and now proposes the term “Operating Communications” which is defined as communications required when the state or status of an Element or Facility of the BES is changed or altered. Three part communications will be required when oral, person-to-person Operating Communications are used.</p>		
Independent Electricity System Operator	Disagree	3-part communication should be used for communicating a directive that must be complied with. The “must be complied with” is needed to distinguish between an “instruction type” of directive and a “need to perform type” of directive. We believe it is the latter that should require 3-part communication.
<p>Response: The SDT thanks you for your comments. The current draft version of COM-003-1 eliminates the term “Interoperability Communication” and now proposes the term “Operating Communications” which is defined as communications required when the state or status of an Element or Facility of the BES is changed or altered. Three part communications will be required when oral, person-to-person Operating Communications are used.</p>		
FirstEnergy	Disagree	Although we agree that proper communication should be used during actions that affect the reliability of the

Organization	Yes or No	Question 6 Comment
		<p>BES, we do not agree with this requirement as written. The following contains our rationale and suggestions:</p> <ol style="list-style-type: none"> <li data-bbox="554 297 2018 557">1. The lower case term "directive" is ambiguous, not defined, and confusing. This is especially true in light of the proposal of the RCSDT to modify COM-002-3 to include a definition of "Reliability Directive" and their plan to use this defined term to invoke 3-part communication. Since the plan of this OPCPSDT is to eventually incorporate the COM-002-3 requirements into this new COM-003-1 standard, we feel the definition of Reliability Directive should be moved to this standard now (instead of later) and the term should be broadened to include any actions that affect the BES reliability. Essentially then, the current proposed R1 of COM-002-3 can be moved to this COM-003-1 standard. Response: The implementation plan proposes retiring COM-002 when COM-003 becomes effective. We also agree the term should be broadened to include any actions that affect the BES reliability. As envisioned, the new term, "Operating Communications" includes "Reliability Directives." <li data-bbox="554 773 1997 1011">2. Our proposal for the term Reliability Directive in item 1 above incorporates the verbiage of the proposed Interoperability Communication definition. Therefore, the proposed term Interoperability Communication is no longer required and can be eliminated. The second draft version of COM-003-1 eliminates the term "Interoperability Communication" and proposes the term "Operating Communications" which is defined as communications required when the state or status of an Element or Facility of the BES is changed or altered. <li data-bbox="554 1092 2007 1328">3. Once the term Reliability Directive and proposed R1 from COM-002-3 are moved to this COM-003-1 standard, the current R5 of COM-003-1 requiring the use of Three-Part Communication could then be revised to require three-part when a Reliability Directive is issued and continue until the operating condition that invoked the Reliability Directive is resolved, mitigated, or ended. The SDT believes that three part communication should be used for all oral, person-to-person Operating Communications. <li data-bbox="554 1409 1980 1442">4. With respect to the proposed R2 and R3 of COM-002-3 which essentially discuss three-part communication,

Organization	Yes or No	Question 6 Comment
		<p>these requirements could be eliminated and would be covered by COM-003-1. As a result, the COM-002-3 requirements being proposed by the RCSDT can be eliminated in their entirety since we have now incorporated all of them into this new COM-003-1.</p> <p>The SDT believes this is the intention as the projects progress through the Standard Development process.</p> <p>5. Since COM-002-3 included the Purchasing-Selling Entity as an applicable entity, since they could be the recipient of a Reliability Related Directive and since, with our proposed changes, COM-002-3 can be retired; the Purchasing-Selling Entity can be added to the applicability section of and incorporated into this new COM-003-1 standard as recommended below.</p> <p>The SDT again believes this is the intention as the projects as they progress through the Standard Development process. There are many contingencies that could surface that could impact the final outcome.</p> <p>In conclusion, we suggest the following changes/additions to COM-003-1:</p> <p>A. Move a revised version of the term "Reliability Directive" from COM-002-3 to this new COM-003-1 standard and define it as follows: "A communication initiated by a Reliability Coordinator, Transmission Operator, or Balancing Authority where the recipient is directed to change the state or report the status of an Element or Facility of the Bulk Electric System."</p> <p>B. Delete proposed definition "Interoperability Communication".</p> <p>C. Delete R2 and R3 of COM-002-3 as suggested in item 4 above.</p> <p>D. Insert a New Requirement R4, renumbered as R2, into new standard COM-003-1 taken from COM-002-3 R1: "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]"</p> <p>E. Revise Requirement R5 and renumber as R3: "Each Reliability Coordinator, Balancing Authority, Transmission Owner, Transmission Operator, Generator Operator, Transmission Service Provider, Load Serving Entity, Distribution Provider, and Purchasing-Selling Entity shall use Three-part Communication for all communications</p>

Organization	Yes or No	Question 6 Comment
		<p>concerning a Reliability Directive that was issued per Requirement R1 and continuing until the actions or status reporting identified in the Reliability Directive has been completed. [Violation Risk Factor: High][Time Horizon: Real time]"</p> <p>F. Add the Purchasing-Selling Entity as an applicable entity to COM-003-1.</p> <p>The SDT does not believe the requirements of COM-003 are applicable to the PSE. The PSE is not involved in real-time operating communication. In addition, the SAR for this project did not include the PSE as a responsible entity.</p>
<p>Response: The SDT thanks you for your comments. Please see our responses above.</p>		
Electric Market Policy	Agree	<p>As currently defined, Three-part Communications presumes the second party will repeat the information back “correctly.” Failure to do so is assigned a High VRF and a Severe VSL. The practical application of Three-part Communication involves a sender communicating information, a receiver repeating back the information, and the sender verifying the repeat back is either correct or incorrect. If the repeat back is incorrect, the process repeats until both parties have the same understanding of what is being communicated. This iterative process needs to be addressed within the definition of Three-part Communications.</p>
<p>Response: The SDT thanks you for your comments. The second draft of the standard captures many of your observations in Requirements R2 and R3. Note that the SDT modified the VRF for both R2 and R3 in the second draft of COM-003 to “Moderate” rather than “High”.</p>		
Transmission System Operations	Disagree	<p>As stated in Question #1, the definition of “Interoperability Communication” needs further clarification. Also, further clarification is needed as to when “Interoperability Communications” is required to be used.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The current draft version of COM-003-1 eliminates the term “Interoperability Communication” and now proposes the term “Operating Communications” which is defined as communications required when the state or status of an Element or Facility of the BES is changed or altered. The second draft of the standard does identify when Operating Communications are required for oral and written communications.</p>		
PJM	Disagree	<p>As suggested in Question 1 above, the term Reliability Directive (as defined in COM-002-3) should be used in place of Interoperability Communication, since the directive is specific to emergency operations. The</p>

Organization	Yes or No	Question 6 Comment
		<p>requirement should read: “Each responsible entity shall use Three-part Communication when issuing a Reliability Directive”.</p> <p>In addition, this requirement should apply only to entities which issue reliability directives - BAs, TOPs & RCs. The other entities listed in the draft standard under Applicability do not issue Reliability Directives.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The OPCP SDT met with the RCS DT and RTOS DT members to coordinate efforts on the use of the terms, “Three-part Communications” and “Reliability Directives.” The teams agreed that the RC SDT will advance the new Glossary term “Reliability Directive” in its Project 2006-06. The second draft version of COM-003-1 has not used the term “directive” or “Reliability Directive” and instead uses the proposed defined term “Operating Communications.” The second draft version of COM-003-1 eliminates the term “Interoperability Communication” and now proposes the term “Operating Communications” which is defined as communications required when the state or status of an Element or Facility of the BES is changed or altered.</p> <p>The second draft includes a new R2 and R3 that fully assign the responsibility for accomplishing three-part communication. The entities listed as applicable in the second draft are limited to Reliability Coordinators, Balancing Authorities, and Transmission Operators, as senders and Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Distribution Provider as receivers of oral person-to-person Operating Communications.</p>		
PJM SOS Comments	Disagree	<p>As suggested in Question 1 above, the term Reliability Directive (as defined in COM-002-3) should be used in place of Interoperability Communication, since the directive is specific to emergency operations. The requirement should read: “Each responsible entity shall use Three-part Communication when issuing a Reliability Directive”.</p> <p>In addition, this requirement should apply only to entities which issue reliability directives - BAs, TOPs & RCs. The other entities listed in the draft standard under Applicability do not issue Reliability Directives.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The OPCP SDT met with the RC SDT and RTO SDT members to coordinate efforts on the use of the terms, “Three-part Communications” and “Reliability Directives”. The teams agreed that the RC SDT will advance the new Glossary term “Reliability Directive” in its Project 2006-06. The second draft version of COM-003-1 has not used the term “directive” or “Reliability Directive” and instead uses the proposed defined term “Operating Communications.” The second draft version of COM-003-1 eliminates the term “Interoperability Communication” and now proposes</p>		

Organization	Yes or No	Question 6 Comment
		<p>the term “Operating Communications” which is defined as communications required when the state or status of an Element or Facility of the BES is changed or altered.</p> <p>The second draft includes a new R2 and R3 that fully assign the responsibility for accomplishing three-part communication. The entities listed as applicable in the second draft are limited to Reliability Coordinators, Balancing Authorities, and Transmission Operators, as senders and Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Distribution Provider as receivers of oral person-to-person Operating Communications.</p>
<p>SERC OC&SOS Standards Review Group</p>	<p>Disagree</p>	<p>As suggested in Question 1 above, the term Reliability Directive (as defined in COM-002-3) should be used in place of Interoperability Communication, since the directive is specific to emergency operations. The requirement should read: “Each responsible entity shall use Three-part Communication when issuing a Reliability Directive”. In addition, this requirement should apply only to BAs, TOPs & RCs. The other entities listed in the draft standard under Applicability do not issue Reliability Directives.</p>
		<p>Response: The SDT thanks you for your comments.</p> <p>The OPCP SDT met with the RC SDT and RTO SDT members to coordinate efforts on the use of the terms, “Three-part Communications” and “Reliability Directives”. The teams agreed that the RC SDT will advance the new Glossary term “Reliability Directive” in its Project 2006-06. The second draft version of COM-003-1 has not used the term “directive” or “Reliability Directive” and instead uses the proposed defined term “Operating Communications.”</p> <p>The second draft version of COM-003-1 has not used the term “Interoperability Communication” and has now used the proposed defined term “Operating Communications” for which the term “Reliability Directive” is included as a subset of “Operating Communications”.</p> <p>The second draft includes a new R2 and R3 that fully assign the responsibility for accomplishing three-part communication. The entities listed as applicable in the second draft are limited to Reliability Coordinators, Balancing Authorities, and Transmission Operators, as senders and Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, and Distribution Provider as receivers of oral person-to-person Operating Communications.</p>
<p>ATC and ITC</p>	<p>Disagree</p>	<p>ATC believes that the term “directive” should be replaced with the term “Reliability Directive” which is being developed under Project 2006-06. It is important for BES reliability that NERC use clearly defined term which will identify the circumstances under which this requirement is enforceable. We provide the definition for “Reliability Directive”, as it appears in the latest posting for Project 2006-06, in our response to question 1.</p>

Organization	Yes or No	Question 6 Comment
		<p>It is our understanding and interpretation that the intent of this requirement is to require entities to use Three-Part Communication during emergency situations in which “Reliability Directives” are being issued. In other words this requirement as proposed does not apply to normal (non-emergency) day-to-day switching. The replacement of the term “directive” with “Reliability Directive” provides the additional clarity around an entity’s compliance obligation.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The OPCP SDT met with the RC SDT and RTO SDT members to coordinate efforts on the use of the terms, “Three-part Communications” and “Reliability Directives”. The teams agreed that the RC SDT will advance the new Glossary term “Reliability Directive” in its Project 2006-06. The second draft version of COM-003-1 has not used the term directive and has now used the proposed defined term “Operating Communications,”</p> <p>The OPCP SDT changed Interoperability Communications to become Operating Communications which includes all communications that change or maintain the state, status, output, or input of an Element or Facility of the Bulk Electric System which could be applicable to routine operations that impact the BES.</p> <p>Your comments on the term Reliability Directive reflect the potential outcome of a Standard under development by another drafting team.</p>		
<p>IRC Standards Review Committee</p>	<p>Disagree</p>	<p>Based on the definition of Interoperability Communications, R5 could imply that three-part communications is required to communicate routine operating instructions. We believe this Requirement contradicts the work that has been done and substantially progressed through two other SDTs and creates confusion within the industry. We believe this Requirement would, in fact, be adverse to reliability instead of enhancing reliability by reducing the amount of pre-action communications that may occur prior to taking action because operators may be more concerned with not repeating back during such pre-action, strategic calls and/or discussion. We support the work being done by the RC SDT and RTO SDT which would define a directive based on the determination of the person giving such an order. We believe, it should be left to the entity that needs the action to be taken to establish the need for three-part communications by stating in the communication that they are issuing a directive. This would be a clear trigger and auditable and measureable. R5 is not consistent with the Functional Model. Only the RC, BA, and TOP issue directives. Thus, the term “...when issuing a directive...” should be “...when communicating directives...” , so both the issuer and receiver are included in the requirement.</p>
<p>The second draft version of COM-003-1 does not use or define the term directive and now proposes defined term “Operating Communications”. The SDT is aware of the term Reliability Directive proposed under NERC Project 2006-06 Reliability Coordination.</p>		

Organization	Yes or No	Question 6 Comment
<p>The term “Interoperability Communication” has been removed from the second draft of COM-003. The second draft includes a new R2 and R3 that fully assign the responsibility for accomplishing three-part communication. The use of three-part communication with Operating Communications does not apply to “non action” items, but to those that instruct a change or maintenance of the state, status, output, or input of an Element or Facility of the Bulk Electric System which could be applicable to routine operations that impact the BES. The entities listed as applicable for issuing an oral Operating Communication in the second draft of COM-003 are limited to Reliability Coordinators, Balancing Authorities, and Transmission Operators. The SDT believes miscommunications during routine operations as described in “Operating Communications” can and do lead to mishaps that impact reliability.</p>		
<p>ISO New England Inc.</p>	<p>Disagree</p>	<p>Based on the definition of Interoperability Communications, R5 could imply that three-part communications is required to communicate routine operating instructions. We believe this Requirement contradicts the work that has been done and substantially progressed through two other SDTs and creates confusion within the industry. We believe this Requirement would, in fact, be adverse to reliability instead of enhancing reliability by reducing the amount of pre-action communications that may occur prior to taking action because operators may be more concerned with not repeating back during such pre-action, strategic calls and/or discussion. We support the work being done by the RC SDT and RTO SDT which would define a directive based on the determination of the person giving such an order. We believe, it should be left to the entity that needs the action to be taken to establish the need for three-part communications by stating in the communication that they are issuing a directive. This would be a clear trigger and auditable and measureable.</p>
<p>The second draft version of COM-003-1 does not use or define the term directive and now proposes defined term “Operating Communications”. The SDT is aware of the term Reliability Directive proposed under NERC Project 2006-06 Reliability Coordination.</p> <p>The term “Interoperability Communication” has been removed from the second draft of COM-003. The second draft includes a new R2 and R3 that fully assign the responsibility for accomplishing three-part communication. The use of three-part communication with Operating Communications does not apply to “non action” items, but to those that that instruct a change to, or maintenance of, the state, status, output, or input of an Element or Facility of the Bulk Electric System which could be applicable to routine operations that impact the BES. The SDT believes miscommunications during routine operations as described in “Operating Communications” can and do lead to mishaps that impact reliability.</p>		
<p>Dynegy</p>	<p>Disagree</p>	<p>Based on the definition of Interoperability Communications, R5 implies that three-part communications is required to communicate routine operating instructions. We believe this Requirement contradicts the work that has been done and substantially progressed through two other SDTs and creates confusion within the industry. We believe this Requirement would, in fact, be adverse to reliability instead of enhancing reliability by reducing</p>

Organization	Yes or No	Question 6 Comment
		<p>the amount of pre-action communications that may occur prior to taking action because operators may be more concerned with not repeating back during such pre-action, strategic calls and/or discussion. We support the work being done by the RC SDT and RTO SDT in Project 2006-06 which would define a Reliability Directive based on the determination of the person giving such an order. We believe, it should be left to the entity that needs the action to be taken to establish the need for three-part communications by stating in the communication that they are issuing a directive. This would be a clear trigger and auditable and measureable. R5 is not consistent with the Functional Model. Only the RC, BA, and TOP can issue directives.</p>
<p>The second draft version of COM-003-1 does not use or define the term directive and now proposes defined term “Operating Communications”. The SDT is aware of the term Reliability Directive proposed under NERC Project 2006-06 Reliability Coordination.</p> <p>The term “Interoperability Communication” has been removed from the second draft of COM-003. The second draft includes a new R2 and R3 that fully assign the responsibility for accomplishing three-part communication. The use of three-part communication with Operating Communications does not apply to “non action” items, but to those that that instruct a change to, or maintenance of, the state, status, output, or input of an Element or Facility of the Bulk Electric System which could be applicable to routine operations that impact the BES. The entities listed as applicable for issuing an oral Operating Communication in the second draft of COM-003 are limited to Reliability Coordinators, Balancing Authorities, and Transmission Operators. The SDT believes miscommunications during routine operations as described in “Operating Communications” can and do lead to mishaps that impact reliability.</p>		
<p>Hydro-Québec TransEnergie</p>	<p>Disagree</p>	<p>Based on the definition of Interoperability Communications, R5 implies that three-part communications is required to communicate routine operating instructions, or during operational strategic discussions as well as other “non-action” oriented communications. This Requirement contradicts the work that has been done and substantially progressed through two other SDTs and creates confusion within the industry. This Requirement would, in fact, be adverse to reliability instead of enhancing reliability by reducing the amount of pre-action communications that may occur prior to taking action because operators may be more concerned with not repeating back during such pre-action, strategic calls and/or discussion. The work being done by the RC SDT and RTO SDT in Project 2006-06 defines a Reliability Directive based on the determination of the person giving such an order. The entity that needs the action to be taken should establish the need for three-part communications by stating in the communication that they are issuing a directive. This would be a clear trigger, auditable, and measureable. R5 is not consistent with the Functional Model. Only the RC, BA, and TOP can issue directives. Outside of allowing the individual who NEEDS the action to be taken, this is an auditable or measureable requirement whether it be for 3-part communications or for the receiving entity to actually take said action. By</p>

Organization	Yes or No	Question 6 Comment
		<p>definition, Three-part Communications presumes the second party will repeat the information back “correctly.” Failure to do so is assigned a High VRF and a Severe VSL. The practical application of Three-part Communication involves a sender communicating information, a receiver repeating back the information, and the sender verifying the repeat back is either correct or incorrect. If the repeat back is incorrect, the process repeats until both parties have the same understanding of what is being communicated.</p>
<p>The second draft version of COM-003-1 does not use or define the term directive and now proposes defined term “Operating Communications”. The SDT is aware of the term Reliability Directive proposed under NERC Project 2006-06 Reliability Coordination.</p> <p>The term “Interoperability Communication” has been removed from the second draft of COM-003. The second draft includes a new R2 and R3 that fully assign the responsibility for accomplishing three-part communication. The use of three-part communication with Operating Communications does not apply to “non action” items, but to those that that instruct a change to, or maintenance of, the state, status, output, or input of an Element or Facility of the Bulk Electric System which could be applicable to routine operations that impact the BES. The entities listed as applicable for issuing an oral Operating Communication in the second draft of COM-003 are limited to Reliability Coordinators, Balancing Authorities, and Transmission Operators. The SDT believes miscommunications during routine operations as described in “Operating Communications” can and do lead to mishaps that impact reliability.</p>		
<p>Midwest ISO Standards Collaborators</p>	<p>Disagree</p>	<p>Based on the definition of Interoperability Communications, R5 implies that three-part communications is required to communicate routine operating instructions. We believe this Requirement contradicts the work that has been done and substantially progressed through two other SDTs and creates confusion within the industry. We believe this Requirement would, in fact, be adverse to reliability instead of enhancing reliability by reducing the amount of pre-action communications that may occur prior to taking action because operators may be more concerned with not repeating back during such pre-action, strategic calls and/or discussion. We support the work being done by the RC SDT and RTO SDT in Project 2006-06 which would define a Reliability Directive based on the determination of the person giving such an order. We believe it should be left to the entity that needs the action to be taken to establish the need for three-part communications by stating in the communication that they are issuing a directive. This would be a clear trigger and easily auditable and measureable. R5 is not consistent with the Functional Model. Only the RC, BA, and TOP can issue directives.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The second draft version of COM-003-1 does not use or define the term directive and now proposes defined term “Operating Communications”.</p>		

Organization	Yes or No	Question 6 Comment
		<p>The SDT is aware of the term Reliability Directive proposed under NERC Project 2006-06 Reliability Coordination.</p> <p>The term “Interoperability Communication” has been removed from the second draft of COM-003. The second draft includes a new R2 and R3 that fully assign the responsibility for accomplishing three-part communication. The use of three-part communication with Operating Communications does not apply to “non action” items, but to those that instruct a change to, or maintenance of, the state, status, output, or input of an Element or Facility of the Bulk Electric System” which could be applicable to routine operations that impact the BES. The entities listed as applicable for issuing an oral Operating Communication in the second draft of COM-003 are limited to Reliability Coordinators, Balancing Authorities, and Transmission Operators.</p>
<p>Northeast Power Coordinating Council</p>	<p>Disagree</p>	<p>Based on the definition of Interoperability Communications, R5 implies that three-part communications is required to communicate routine operating instructions, or during operational strategic discussions as well as other “non-action” oriented communications. This Requirement contradicts the work that has been done and substantially progressed through two other SDTs and creates confusion within the industry. This Requirement would, in fact, be adverse to reliability instead of enhancing reliability by reducing the amount of pre-action communications that may occur prior to taking action because operators may be more concerned with not repeating back during such pre-action, strategic calls and/or discussion. The work being done by the RC SDT and RTO SDT in Project 2006-06 defines a Reliability Directive based on the determination of the person giving such an order. The entity that needs the action to be taken should establish the need for three-part communications by stating in the communication that they are issuing a directive. This would be a clear trigger, auditable, and measureable. R5 is not consistent with the Functional Model. Only the RC, BA, and TOP can issue directives.</p> <p>Response: The second draft version of COM-003-1 does not use or define the term directive and now proposes defined term “Operating Communications”. The SDT is aware of the term Reliability Directive proposed under NERC Project 2006-06 Reliability Coordination.</p> <p>The term “Interoperability Communication” has been removed from the second draft of COM-003. The second draft includes a new R2 and R3 that fully assign the responsibility for accomplishing three-part communication. The use of three-part communication with Operating Communications does not apply to “non action” items, but to those that instruct a change to, or maintenance of, the state, status, output, or input of an Element or Facility of the Bulk Electric System which could be applicable to routine operations that impact the BES. The entities listed as applicable for issuing an oral person-to-person Operating Communication in the second draft of COM-003 are limited to Reliability Coordinators, Balancing Authorities, and Transmission Operators. The SDT believes miscommunications during routine operations as described in “Operating</p>

Organization	Yes or No	Question 6 Comment
		<p>Communications” can and do lead to mishaps that impact reliability.</p> <p>Outside of allowing the individual who NEEDS the action to be taken, this is an auditable or measureable requirement whether it be for 3-part communications or for the receiving entity to actually take said action. By definition, Three-part Communications presumes the second party will repeat the information back “correctly.” Failure to do so is assigned a High VRF and a Severe VSL. The practical application of Three-part Communication involves a sender communicating information, a receiver repeating back the information, and the sender verifying the repeat back is either correct or incorrect. If the repeat back is incorrect, the process repeats until both parties have the same understanding of what is being communicated.</p> <p>Response: The SDT has added “not necessarily verbatim” to Requirement R3.</p>
<p>Response: The SDT thanks you for your comments. Please see our responses above.</p>		
Northeast Utilities	Disagree	<p>Based on the definition of Interoperability Communications, R5 implies that three-part communications is required to communicate routine operating instructions, or during operational strategic discussions as well as other “non-action” oriented communications. This Requirement contradicts the work that has been done and substantially progressed through two other SDTs and creates confusion within the industry. This Requirement would, in fact, be adverse to reliability instead of enhancing reliability by reducing the amount of pre-action communications that may occur prior to taking action because operators may be more concerned with not repeating back during such pre-action, strategic calls and/or discussion. The work being done by the RC SDT and RTO SDT in Project 2006-06 defines a Reliability Directive based on the determination of the person giving such an order. The entity that needs the action to be taken should establish the need for three-part communications by stating in the communication that they are issuing a directive. This would be a clear trigger, auditable, and measurable.</p>
<p>The second draft version of COM-003-1 does not use or define the term directive and now proposes defined term “Operating Communications”. The SDT is aware of the term Reliability Directive proposed under NERC Project 2006-06 Reliability Coordination.</p> <p>The term “Interoperability Communication” has been removed from the second draft of COM-003. The second draft includes a new R2 and R3 that fully assign the responsibility for accomplishing three-part communication. The use of three-part communication with Operating Communications does not apply to “non action” items, but to those that instruct a change to, or maintenance of, the state, status, output, or input of an Element or Facility of the Bulk Electric System which could be applicable to routine operations that impact the BES. The SDT believes miscommunications</p>		

Organization	Yes or No	Question 6 Comment
<p>during routine operations as described in “Operating Communications” can and do lead to mishaps that impact reliability.</p>		
National Grid	Disagree	<p>Based on the definition of Interoperability Communications, this would require 3- part communication to be used during virtually all control room communications. The definition of Interoperability Communications should be revised as proposed in response to Question 1.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The OPCP SDT replaced “Interoperability Communications” with “Operating Communications” which includes all communications that instruct a change to, or maintenance of, the state, status, output, or input of an Element or Facility of the Bulk Electric System. By use of the term, “Operating Communications” the second draft of COM-003 requires three-part communication only for operations that change or maintain the state, status, output, or input of an Element or Facility of the Bulk Electric System.</p>		
California Independent System Operator	Disagree	<p>CAISO Comments:</p> <p>Until “directive” is a defined term the industry should not accept requirements governing actions regarding directives. Directive is currently being defined in an interpretation. Subsequent interpretations may subvert the standards drafting process. Terms should be formally defined before inclusion in other standards to prevent future interpretation issues, including the changing of a standard outside of the accepted Standard Development process.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The second draft version of COM-003-1 does not use or define the term “directive” and now proposes the defined term “Operating Communications”. The SDT is aware of the term Reliability Directive proposed under NERC Project 2006-06 Reliability Coordination.</p>		
New York State Reliability Council	Disagree	<p>Comments:</p> <p>The SDT should define Directive. Draft Com-002 -3 has a similar requirement to identify a directive and then utilize three-part communication. Also Com-002-3 Three part communication differs from the description of Three-part communication in this Standard. NYSRC prefers Com-002-3 usage of the word “intent” in the repeat back. Also see comments to Question 1.</p>
<p>Response: The SDT thanks you for your comments.</p>		

Organization	Yes or No	Question 6 Comment
<p>The second draft version of COM-003-1 does not use or define the term “directive” and now proposes the defined term “Operating Communications”. The SDT is aware of the term Reliability Directive proposed under NERC Project 2006-06 Reliability Coordination.</p> <p>The second draft of the standard includes the phrase, “not necessarily verbatim” in describing the repeat back.</p>		
<p>Tri-State Generation & Transmission Assoc.</p>	<p>Disagree</p>	<p>Directive is not defined. This would require issuing a directive for each and every verbal communication between entities, even those that pose no risk to the BES, which is not necessary.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The second draft version of COM-003-1 does not use or define the term “directive” and now proposes the defined term “Operating Communications”. The SDT is aware of the term Reliability Directive proposed under NERC Project 2006-06 Reliability Coordination. Unless a communication would impact the BES as described in the proposed definition of “Operating Communications” the SDT does not believe every conversation would require three-part communications.</p>		
<p>E.ON U.S. LLC</p>	<p>Disagree</p>	<p>E ON US believes more specificity is required as to what constitutes a “directive”. Moreover, this requirement is redundant in light of COM-002 R2 for normal operations. If COM-003 is only applicable to emergencies, then this R5 would appear reasonable. E.ON U.S. suggests editing R5 and M5 as follows: Each Responsible Entity shall use Three-part Communications when issuing and/or receiving a directive during verbal Interoperability Communications</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The second draft version of COM-003-1 does not use or define the term “directive” and now proposes the defined term “Operating Communications”.</p> <p>COM -003 is not limited to emergencies only.</p> <p>The second draft includes a new R2 and R3 that fully assign the responsibility for accomplishing three-part communication and uses the new term Operating Communication.</p>		
<p>American Municipal Power</p>	<p>Agree</p>	<p>I feel that there needs to be a way to verify what has been said. Three-part Communications accomplish the verification that may be required as a result of the communication medium. If a better method is developed I</p>

Organization	Yes or No	Question 6 Comment
		propose that it be used.
<p>Response: The SDT thanks you for your comments.</p>		
American Electric Power	Disagree	Is a “directive” from the RC a “directive” all the way through the communication process, including down to the plant orders? Again, based on definitions provided in the functional model, the inclusion of the TSP and LSE in this standard is inappropriate. These entities manage the relationship with the end-use customer and are not responsible for the operation or maintenance of BES facilities. Consequently, when would such entities be responsible for issuing “directives?”
<p>Response: The SDT thanks you for your comments.</p> <p>The second draft version of COM-003-1 does not use or define the term “directive” and now proposes the defined term “Operating Communications”. The term Reliability Directive is proposed under NERC Project 2006-06 Reliability Coordination.</p> <p>The SDT agrees with your comments on TSPs and LSEs and has removed them because they were not bound by this requirement in the originating SAR.</p>		
NIPSCO	Disagree	It's not clear whether this is limited to emergency situations. In the Purpose section of this standard the line "especially during alerts and emergencies" seems rather vague. When does this standard exactly apply?
<p>Response: The SDT thanks you for your comments.</p> <p>The second draft version of COM-003-1 does not use or define the term “directive” and now proposes the defined term “Operating Communications”. The SDT is aware of the term “Reliability Directive” proposed under NERC Project 2006-06 Reliability Coordination. The second draft of COM-003 proposes requiring use of three part communications for, verbal “Operating Communications” to any communication that instructs a change to, or maintenance of, the state, status, output, or input of an Element or Facility of the Bulk Electric System and is not limited to emergencies.</p>		
Manitoba Hydro		<p>Move requirement as planned but keep Three-part Communication definition as stated originally in COM-002-2 R2.</p> <p>1) Reading the “Disposition/Explanation” it appears that COM-002-2 R2 will eventually be moved into COM-003 R5. This appears logical as COM-002-2 ensures staffing and communication capabilities.</p>

Organization	Yes or No	Question 6 Comment
		<p>a .The statement in COM-002 R2 is reasonably descriptive, but loses its depiction when replaced with statement found in COM-003-0 R5.</p> <p>2) Regarding COM-002-2 R2, Manitoba Hydro interprets part 2 (repeat back correctly) of Three-part Communication to mean; that the party receiving the directive has clearly received it in its full form and understands completely what is expected of him and to convey this to the sender</p> <p>i. We delineated “repeating back correctly” to mean any of the three protocols as acceptable:</p> <ol style="list-style-type: none"> 1. Actually repeating back the directives correctly. 2. The recipient verifies the issued directive(s) are identical to a copy they have at hand. Example for clarification: “The steps you have read are identical to what I have here on Order Number 1234, Revision 5 and I understand I can proceed with steps 3, 4 and 5.” 3.The recipient summarizes the issued directive(s) to a copy they have at hand. Example for clarification: “I will do step 8, open all 115 kV disconnects as read to me and are identical to the order 1234 Revision 5 that I have at hand”. 4. This all could be resolved by using the term “repeat back the intent of the directive”. This statement could allow the operator to determine if the recipient fully understands and is capable of carrying out the directive, by the method of the recipient reply (any literate person can read back a written statement, but do they understand what they are doing and the consequences). <p>ii.The purpose of protocols 2 and 3 are to alleviate potential of “lose of attention” due to the tedious receptiveness of long written directives. Summarizing or verifying these types of written orders will maintain the interest and attention to the detail.</p> <p>iii.Verbally detailing a directive at least once in any single conversation by either party should be sufficient to fulfill the first two parts of Three-part Communications (Clear and concise, repeat back).</p> <p>iv. Part 3 (acknowledge to satisfaction of the originator) could ensure that the person receiving the directive is capable and competent of carrying out the directive.</p> <p>v. None written (changes, revisions, real time emergency switching) and radio communication directives are a must for repeating back and are covered by other local policies. Part Two “Three Part Identification”</p>

Organization	Yes or No	Question 6 Comment
		<p>The SDT believes many of the details you have listed above are incorporated into the new R2 and R3 in the second draft of COM 003-01. We would appreciate your comments in the initial ballot.</p> <p>3) This new Standard COM-003-1 should contain a requirement for “Three Part Identification” or more commonly known as “Full Name Identification”. This is not addressed fully anywhere in the NERC standards.</p> <p>4)We have defined “Three Part Identification” based loosely on common industry best practice into three parts:</p> <ol style="list-style-type: none"> 1. Location - Company Name, Control Room Name, etc. 2. Area of responsibility or authority (function) - The operator at the desk must identify his position such as Balancing Authority or Distribution Operate, etc. 3. Identification - Unique identifier such as first and last Name. <p>The SDT acknowledges and believes your comments on Full Name Identification do constitute a strong best practice which would add additional clarity to operating communications. For many organizations that becomes overly prescriptive and conflicts with their existing nomenclature scheme.</p>
<p>Response: The SDT thanks you for your comments. Please see our responses above.</p>		
NERC Staff	Disagree	<p>NERC staff agrees with the principle behind Requirement R5. We recommended in Question 1 that the term “Three-part Communication” be removed since it is only used in this requirement. We feel that this requirement should be split into two requirements so that the sender and receiver each have responsibility in the communication. Therefore, we offer the following as suggested replacement language for Requirement R5:Each Reliability Coordinator, Balancing Authority, Transmission Owner, Transmission Operator, Generator Operator, Transmission Service Provider, Load Serving Entity and Distribution Provider that receives a verbal Operating Communication shall repeat the communication to the initiator. Each Reliability Coordinator, Balancing Authority, Transmission Owner, Transmission Operator, Generator Operator, Transmission Service Provider, Load Serving Entity and Distribution Provider that initiates a verbal Operating Communication shall ensure that the receiving party has repeated the communication, and shall verbally confirm the communication to be correct or reinitiate the communication.</p>

Organization	Yes or No	Question 6 Comment
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT has removed the definition for “Three-part communication” in the second draft of COM-003-1 standard.</p> <p>The second draft includes a new R2 and R3 that fully assign the responsibility for accomplishing three-part communication.</p>		
<p>NextEra Energy Resources, LLC</p>	<p>Disagree</p>	<p>NextEra believes that by associating the “3-part communication” method with “directives” this standard drafting team could be at risk of unintentionally defining a directive as anything that takes the 3-part communication form. We would encourage the standard drafting team to continue to use the terms already employed in the draft standard: “... three-part communication be used when issuing instructions related to actual or expected emergency conditions.”</p>
<p>Response: The SDT thanks you for your comments.</p> <p>In the second draft of COM-003, the SDT proposes that three-part communication would be required when verbal person-to-person “Operating Communications” take place for any communication to instruct a change to, or maintenance of, the state, status, output, or input of an Element or Facility of the Bulk Electric System. This could include non emergency conditions.</p>		
<p>PPL</p>	<p>Disagree</p>	<p>Only RCs, TOPs, & Bas issue directives. The other entities should be removed from this requirement.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The second draft version of COM-003-1 does not use or define the term “directive” and now proposes the defined term “Operating Communications” for any communication to instruct a change to, or maintenance of, the state, status, output, or input of an Element or Facility of the Bulk Electric System. Other entities have to participate so they remain responsible as designated.</p>		
<p>Progress Energy Carolina, Inc</p>	<p>Disagree</p>	<p>PEC supports creating a definition of Reliability Directives. PEC may then agree that each entity shall use 3-part communications when issuing Reliability Directives during “Interoperability Communications.” Alternatively, simplify and change to use Three Part Communications when using Interoperability Communications.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The second draft version of COM-003-1 does not use or define the term “directive” and now proposes defined term “Operating Communications”.</p> <p>The SDT is aware of the term Reliability Directive proposed under NERC Project 2006-06 Reliability Coordination.</p>		

Organization	Yes or No	Question 6 Comment
<p>The second draft includes a new R2 and R3 that fully assign the responsibility for accomplishing three-part communication for verbal “Operating Communications”.</p>		
<p>Pacific Northwest Small Utilities Comment Group</p>	<p>Disagree</p>	<p>Per TOP-001 and IRO-001, only TOs and RCs have the authority to issue reliability directives (per the proposed definition of interoperability communications, such directives would qualify as reliability directives). All other entity types should be removed from this requirement.</p> <p>The applicable entities in the standard include senders and receivers of three part communications.</p> <p>As in Q2, the transition is a concern. Unless the effective date of COM-003-1 is the same as the date of retirement of COM-002; there will either be a reliability gap where neither active standard requires three-part communication, or there will be a situation where an entity could be doubly jeopardized for a single event.</p> <p>The implementation plan for COM-003 proposes retiring COM-002 when COM-003 becomes effective – as envisioned, only one standard will be in place at a time.</p> <p>Three-part communication is worthless unless the recipient understands what he/she is parroting and is authorized to take action. For example, many DPs/LSEs do not maintain 24/7 dispatch desks and an afterhours call may go to an answering service. Three-part communication with the answering service operator will only delay the requested action. The entity issuing the directive should be required to ensure their employee reaches someone authorized to take action before delivering the directive via Three-part communication.</p> <p>The SDT reviewed the SAR and has removed TSPs and LSEs as applicable entities; however DPs were included as applicable entities and have been retained in COM-003-1. The specified role of the DP to shed load justifies the retention of the DP as an applicable Entity.</p>
<p>Response: The SDT thanks you for your comments. Please see our responses above.</p>		
<p>Georgia Transmission Corp</p>	<p>Disagree</p>	<p>Replace “directive during verbal Interoperability Communications” with “Reliability Directive”.</p> <p>Replace "Each Responsible Entity" with "TOPs & RCs". The other entities listed in the draft standard under Applicability do not issue Reliability Directives.</p>
<p>Response: The SDT thanks you for your comments.</p>		

Organization	Yes or No	Question 6 Comment
<p>The second draft version of COM-003-1 eliminates the term “Interoperability Communication” and now proposes the term “Operating Communications” which is defined as communications required when the state or status of an Element or Facility of the BES is changed or altered. The term “Reliability Directive is being proposed under NERC Project 2006-06 Reliability Coordination and is not used in COM-003.</p> <p>The phrase “Each Responsible Entity” was replaced with the name of each of the responsible functional entities.</p>		
<p>Entergy Services</p>	<p>Disagree</p>	<p>Should be rewritten to say that “Each Responsible Entity shall use Three-part Communications when issuing a Reliability Directive.” This should use the definition of Reliability Directive as proposed in project 2006-06. Entergy recommends not including the definition of Interoperability Communications in this standard or in the R5 Requirement. Also, the list of responsible entities listed in the requirement R5 is not all able to issue Reliability Directives. So this requirement should be limited to Reliability Coordinators, Balancing Authorities and Transmission Operators, who can issue Reliability Directives.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The second draft version of COM-003-1 does not use or define the term “directive” and now proposes defined term “Operating Communications” which is defined as communications required when the state or status of an Element or Facility of the BES is changed or altered. The SDT is aware of the term “Reliability Directive” proposed under NERC Project 2006-06 Reliability Coordination. It is a draft proposal and has not been filed or approved.</p> <p>There are other entities listed as applicable who have to receive and repeat back “Operating Communications.”</p>		
<p>Southern Company Transmission</p>	<p>Disagree</p>	<p>Southern Company supports the SERC SOS comments.</p> <p>SERC SOS comments:</p> <p>As suggested in Question 1 above, the term Reliability Directive (as defined in COM-002-3) should be used in place of Interoperability Communication, since the directive is specific to emergency operations.</p> <p>The requirement should read: “Each responsible entity shall use Three-part Communication when issuing a Reliability Directive”. In addition, this requirement should apply only to BAs, TOPs & RCs. The other entities listed in the draft standard under Applicability do not issue Reliability Directives.</p> <p>Southern Company comments: conditional on if the definition of directive is not routine operational instruction.</p>

Organization	Yes or No	Question 6 Comment
<p>Response: The SDT thanks you for your comments.</p> <p>The second draft version of COM-003-1 eliminates the term “Interoperability Communication” and now proposes the term “Operating Communications” which is defined as communications required when the state or status of an Element or Facility of the BES is changed or altered.</p> <p>The second draft version of COM-003-1 does not use or define the term “directive” and now proposes defined term “Operating Communications”. The SDT is aware of the term “Reliability Directive” proposed under NERC Project 2006-06 Reliability Coordination. The term “Operating Communications” is not restricted to emergencies.</p> <p>The other entities who are listed have to receive and repeat back “Operating Communications.”</p>		
Bonneville Power Administration	Agree	Suggest that each entity is also required to use the full station name in verbal communications.
<p>Response: The SDT thanks you for your comments.</p>		
Indiana Municipal Power Agency	Disagree	The definition of Interoperability Communications is not clear and this requirement could require Three-part Communications to communicate routine, internal instructions within an entity. In addition, the definition of a directive is being worked on by a NERC SDT, and this definition might help clear up any confusion in this requirement, along with a better definition of Interoperability Communications.
<p>Response: The SDT thanks you for your comments.</p> <p>The second draft version of COM-003-1 eliminates the term “Interoperability Communication” and now proposes the term “Operating Communications” which is defined as communications required when the state or status of an Element or Facility of the BES is changed or altered.</p> <p>The second draft version of COM-003-1 does not use or define the term “directive” and now proposes the defined term “Operating Communications”. The SDT is aware of the term “Reliability Directive” proposed under NERC Project 2006-06 Reliability Coordination.</p>		
NYSEG	Disagree	The definition of Three-part Communications and Interoperability Communications needs to be revised as explained above.
<p>Response: The SDT thanks you for your comments.</p> <p>The second draft version of COM-003-1 eliminates the term “Interoperability Communication” and now proposes the term “Operating</p>		

Organization	Yes or No	Question 6 Comment
<p>Communications” which is defined as communications required when the state or status of an Element or Facility of the BES is changed or altered.</p>		
PSEG Companies	Disagree	The PSEG Companies agree with the concerns expressed in the comments filed by the PJM System Operations Subcommittee (SOS) Group.
<p>Response: The SDT thanks you for your comments. Please see our response to the PJM System Operations Subcommittee (SOS) Group.</p>		
Puget Sound Energy	Disagree	The requirement should use the NERC defined term “Reliability Directive,” instead of the general term “directive.”
<p>Response: The SDT thanks you for your comments. The current draft version of COM-003-1 does not use or define the term “directive” and now proposes defined term “Operating Communications”. The SDT is aware of the term “Reliability Directive” proposed under NERC Project 2006-06 Reliability Coordination.</p>		
ERCOT ISO	Disagree	The requirement, based on the definitions of the terms, introduces ambiguity or even conflict. Three part communication should be required for emergency situations and with the issuance of Reliability Directives (term not yet formally defined - in the works by the Reliability Coordination SDT). Interoperability communications refer to any communications in which a status of a facility or element is to be changed, which means not specifically related to emergencies.
<p>Response: The SDT thanks you for your comments. The second draft version of COM-003-1 eliminates the term “Interoperability Communication” and now proposes the term “Operating Communications” which is defined as communications required when the state or status of an Element or Facility of the BES is changed or altered. This will apply to routine operations that impact the BES. The second draft version of COM-003-1 does not define or use the term “directive” and now proposes defined term “Operating Communications”. The SDT is aware of the term Reliability Directive proposed under NERC Project 2006-06 Reliability Coordination. The term “Operating Communications” is not restricted to emergencies.</p>		

Organization	Yes or No	Question 6 Comment
Santee Cooper	Disagree	The SDT should consider using the now defined term Reliability Directive in place of Interoperability Communications. Typically, only BAs, TOPs, or RCs issue Reliability Directives so this requirement should only be applicable to those entities.
<p>Response: The SDT thanks you for your comments.</p> <p>The second draft version of COM-003-1 eliminates the term “Interoperability Communication” and now proposes the term “Operating Communications” which is defined as communications required when the state or status of an Element or Facility of the BES is changed or altered. More applicable entities will be impacted by “Operating Communications” since three part communication involves both senders and receivers of communications.</p>		
Long Island Power Authority	Disagree	The SDT should define Directive. Draft Com-002 -3 has a similar requirement to identify a directive and then utilize three-part communication. Also Com-002-3 Three part communication differs from the description of Three-part communication in this Standard. LIPA prefers Com-002-3 usage of the word “intent” in the repeat back. Also see comments to Question 1.
<p>Response: The SDT thanks you for your comments.</p> <p>The second draft version of COM-003-1 eliminates the term “Interoperability Communication” and now proposes the term “Operating Communications” which is defined as communications required when the state or status of an Element or Facility of the BES is changed or altered. The second draft version of COM-003-1 does not use or define the term “directive” and now proposes defined term “Operating Communications”. The SDT is aware of the term Reliability Directive proposed under NERC Project 2006-06 Reliability Coordination and is not filed or approved. The SDT current draft “correct but not necessarily verbatim” in describing the repeat back.</p>		
South Carolina Electric and Gas	Disagree	The term "directive" should be changed to "Reliability Directive" as defined in COM-002-3.
<p>Response: The SDT thanks you for your comments.</p> <p>The term “Reliability Directive’ is not approved. It also has a very narrow focus and in its present form is restricted to emergencies. The OPCP SDT is proposing the term “Operating Communications” which is more inclusive and would have a bigger scope to improve reliability.</p>		

Organization	Yes or No	Question 6 Comment
Transmission Owner	Disagree	<p>The term “directive” as of yet has not been explicitly defined. Furthermore, FPL believes that by associating the “3-part communication” method with “directives” this standard drafting team could be at risk of unintentionally defining a directive as anything that takes the 3-part communication form. We would encourage the standard drafting team to continue to use the terms already employed in the draft standard: “... three-part communication be used when issue instructions related to “actual or expected emergency conditions.”</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The second draft version of COM-003-1 does not define or use the term “directive” and now proposes the defined term “Operating Communications” which will require three-part communication for communications required when the state or status of an Element or Facility of the BES is changed or altered. This will apply to routine operations that impact the BES.</p> <p>The SDT is aware of the term “Reliability Directive” proposed under NERC Project 2006-06 Reliability Coordination.</p>		
We Energies	Disagree	<p>The term “directive” should be replaced with the term “Reliability Directive” as defined by the Drafting Team working on Project 2006-06 which states it as: “A communication initiated by a Reliability Coordinator, Transmission Operator or Balancing Authority where action by the recipient is necessary to address an actual or expected Emergency”. Three-part Communication should be required (with regard to compliance) during emergency situations in which Reliability Directives are being issued. This requirement should not apply to normal or non-emergency situations, and should be enforceable between Functional Entities (distinct entities, not within a given organization). As noted in question 2, R5 should not apply to a TSP or LSE.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The term “Reliability Directive’ is not approved. It also has a very narrow focus and in its present form is restricted to emergencies. The OPCP SDT is proposing the term “Operating Communications” which is more inclusive and will require three-part communications when the state or status of an Element or Facility of the BES is changed or altered. This will apply to routine operations that impact the BES.</p> <p>The SDT is aware of the term “Reliability Directive” proposed under NERC Project 2006-06 Reliability Coordination. This standard would have a bigger scope to improve reliability.</p> <p>The SDT has removed the TSPs and LSEs because they were not bound by this requirement in the originating SAR.</p>		
Energy	Disagree	<p>The term interoperability communications is not clear.</p>

Organization	Yes or No	Question 6 Comment
<p>Response: The SDT thanks you for your comments.</p> <p>The second draft version of COM-003-1 eliminates the term “Interoperability Communication” and now proposes the term “Operating Communications” which is defined as communications required when the state or status of an Element or Facility of the BES is changed or altered.</p>		
Xcel Energy	Disagree	The way the standard is written, the term "directive" is still open to interpretation and could be inconsistently applied. The term "directive" should be defined.
<p>Response: The SDT thanks you for your comments.</p> <p>The second draft version of COM-003-1 does not define or use the term “directive” and now proposes the defined term “Operating Communications”. The SDT is aware of the term “Reliability Directive” proposed under NERC Project 2006-06 Reliability Coordination.</p>		
Florida Municipal Power Agency (FMPA) and some members	Agree	<p>The word “directive” is ambiguous. The standard should either require the Reliability Coordinator to define a “directive” or the standard should make this a defined term so that there is clarity between what is and what is not a directive. In fact, the “disposition” does state that “Reliability Directive” definition is in the scope of the SDT’s effort.</p> <p>We do not think that this merits an increase from a “Medium” VRF in COM-002-2 R2 to a “High” VRF in this standard, especially if the actual action taken was in accordance with the direction given.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The second draft version of COM-003-1 does not use or define the term “directive” and now proposes defined term “Operating Communications”. The SDT is aware of the term “Reliability Directive” proposed under NERC Project 2006-06 Reliability Coordination.</p> <p>The SDT has modified the VRFs and VSLs to comply with approved NERC and FERC guidelines. The SDT believes the new assignments more accurately classify the VRFs and VSLs assigned to the Requirements in COM-003-01. The VRF associated with the requirement to use three-part communication in the second draft of COM-003 is “Medium.”</p>		
NRECA RTF Members	Disagree	We agree that Three-part communication is a more accurate form of communication for issuing and responding to a Directive during verbal Interoperability Communications and should remain as a requirement of this standard. However since the term “directive” has not been defined it is unclear when Three-part communication is required.

Organization	Yes or No	Question 6 Comment
<p>Response: The SDT thanks you for your comments.</p> <p>The second draft version of COM-003-1 does not use or define the term “directive” and now proposes the defined term “Operating Communications” and proposes using three-part communication for any communication when the state or status of an Element or Facility of the BES is changed or altered.</p>		
Duke Energy	Disagree	<p>We believe that the term “directive” should be defined. This SDT should work with the COM-002 SDT to come up with common phraseology and definition for the term “Directive”. Work on COM-003-1 should have begun by defining “directive”, and limiting the requirement to use 3-part communications to “directives”, and not requiring it for general day-to-day communications. The entity issuing a “directive” should inform the receiving entity that it is a directive and therefore requires the use of 3-part communications.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The second draft version of COM-003-1 does not use or define the term “directive” and now proposes the defined term “Operating Communications” which requires use of three-part communication for any communication when the state or status of an Element or Facility of the BES is changed or altered.</p>		
The Empire District Electric Company	Disagree	<p>When and why would a GO, TSP or LSE ever issue a directive? Directives are given by RC's. Use the definition of Third Party Communications provided earlier in this comment form.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The second draft version of COM-003-1 does not use or define the term “directive” and now proposes the defined term “Operating Communications”. The SDT appreciates the comments with regards to concerns related to including GOs, TSPs and LSEs that do not own or operate facilities that are a part of the BES. The SDT has removed the TSPs and LSEs because they were not bound by this requirement in the originating SAR. The GO was not included in the draft standard of the requirement.</p>		
MRO NERC Standards Review Subcommittee	Disagree	<p>Without defining “directive” the SDT is leaving the industry in the same situation we are currently in. As discussed in the response to Question #1 above, it is our opinion that the definition of Reliability Directive must be developed and included in the discussion of this standard (COM-003-1), and should be as defined in Project 2006-06: “A communication initiated by a Reliability Coordinator, Transmission Operator or Balancing Authority where action by the recipient is necessary to address an actual or expected Emergency.”. Based on the definition</p>

Organization	Yes or No	Question 6 Comment
		<p>of Interoperability Communications, R5 could imply that three-part communications is required to communicate routine operating instructions. We believe this Requirement contradicts the work that has been done and substantially progressed through two other SDTs and creates confusion within the industry. We believe this Requirement would, in fact, be adverse to reliability instead of enhancing reliability by reducing the amount of pre-action communications that may occur prior to taking action because operators may be more concerned with not repeating back during such pre-action, strategic calls and/or discussion. We support the work being done by the RC SDT and RTO SDT which would define a directive based on the determination of the person giving such an order. We believe, it should be left to the entity that needs the action to be taken to establish the need for three-part communications by stating in the communication that they are issuing a directive. This would be a clear trigger and auditable and measureable.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The second draft version of COM-003-1 does not use or define the term “directive” and now proposes the defined term “Operating Communications”. The SDT is aware of the term Reliability Directive proposed under NERC Project 2006-06 Reliability Coordination. The second draft version of COM-003-1 eliminates the term “Interoperability Communication” and now proposes the term “Operating Communications” which is defined as communications required when the state or status of an Element or Facility of the BES is changed or altered.</p> <p>This standard would apply when verbal “Operating Communications” take place and would apply to any communications involving a change to, or maintenance of, the state, status, output, or input of an Element or Facility of the Bulk Electric System.</p>		
Great River Energy	Disagree	<p>Without defining directive the SDT is leaving the industry in the same situation we are currently in. As discussed in the response to Question #1 above, it is GRE’s opinion that the definition of Reliability Directive must be developed and included in the discussion of this standard. The term directive should be as defined in Project 2006-06: A communication initiated by a Reliability Coordinator, Transmission Operator or Balancing Authority where action by the recipient is necessary to address an actual or expected Emergency.. GRE believes it should be left to the entity that needs the action to be taken to establish the need for three-part communications by stating in the communication that they are issuing a directive. This would be a clear trigger and easily auditable and measureable.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The second draft version of COM-003-1 does not use or define the term “directive” and now proposes the defined term “Operating</p>		

Organization	Yes or No	Question 6 Comment
		<p>Communications” which would apply to any communication involving a change to, or maintenance of, the state, status, output, or input of an Element or Facility of the Bulk Electric System. The SDT is aware the term “Reliability Directive” is being proposed under NERC Project 2006-06 Reliability Coordination.</p>

7. Requirement R6 of the draft COM-003-1 states, “Each Responsible Entity shall use the North Atlantic Treaty Organization (NATO) phonetic alphabet as identified in Attachment 2-COM-003-1 when issuing directives, notifications, directions, instructions, orders or other reliability related operating information that involves alpha-numeric information during verbal Interoperability Communications.” Do you agree with this proposal? If not, please explain in the comment area.

Summary Consideration:

Most stakeholders who responded to this question disagreed with the proposal. Many commenters indicated the use of a phonetic alphabet is not necessary and should not be required, as it will not improve reliability of the BES and indicated that there are no instances where the absence of its use has resulted in reliability problems. The SDT disagrees with this comment and believes that enhanced clarity around verbally conveyed alpha-numeric information is critical for ensuring clear and effective real-time communication between BES operating entities.

Commenters stated requiring strict adherence to and precise pronunciation of the NATO phonetic alphabet is overly prescriptive, and the proposed standard should allow for other phonetic clarifiers where clarity on alpha-numeric information is necessary. The SDT agrees, and has modified the requirement to allow use of “accurate alpha-numeric clarifiers,” which could include alpha-numeric clarifiers other than the NATO phonetic alphabet.

Commenters pointed out that the requirement is being applied too broadly (e.g. to notifications, directions, instructions, orders and other reliability related operating information). The SDT agrees and has modified the proposed standard by restricting the requirement's applicability only to verbal Operating Communication.

A few commenters showed concern over having operators potentially struggling to remember the NATO phonetic alphabet during emergency situations, rather than focusing on the communication itself, in contradiction with the stated purpose of the standard. The SDT disagrees and believes that adequate training, familiarity with and use of alpha-numeric clarifiers will eliminate struggles for operators and avoid operating errors due to miscommunication.

Still other commenters stated this proposed requirement is a best practice. They suggest that the use of the NATO phonetic alphabet should only be required when needed for clarity. The SDT believes the use of a phonetic alphabet during verbal real-time communication between BES operating entities goes beyond a best practice and should be a mandatory requirement.

Organization	Yes or No	Question 7 Comment
Bureau of	Agree	

Organization	Yes or No	Question 7 Comment
Reclamation		
Consumers Energy	Agree	
ExxonMobil Research and Engineering	Agree	
Kansas City Power & Light	Agree	
Old Dominion Electric Cooperative	Agree	
Oncor Electric Delivery	Agree	
PacifiCorp	Agree	
PEF	Agree	
Sunflower Electric Power Corporation	Agree	
Bonneville Power Administration	Disagree	
Orange and Rockland Utilities, Inc.	Disagree	
American Electric Power	Disagree	AEP does not believe that this should be a requirement. It is understood that three-part communications represent best practices, but it is not necessary to mandate the NATO phonetic alphabet. We are not aware of an instance where the use of “Ed” rather than “Echo” has resulted in a reliability compliance breakdown.
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT agrees with your second comment, and has modified the requirement to allow for any accurate alpha-numeric clarifier.</p>		

Organization	Yes or No	Question 7 Comment
<p>The SDT believes that clarity around verbally conveyed alpha-numeric information is critical for ensuring clear and effective real-time communication between BES operating entities.</p>		
Indiana Municipal Power Agency	Disagree	<p>An entity should not be required to use a specific phonetic alphabet. If a letter needs to be clarified, then boy, bob or beta should be allowed to convey the letter "B". In an emergency, an entity wants its coordinators to be concentrating on the situation and not worrying about using the proper phonetic alphabet word for the letter "B".</p>
<p>Response: The SDT thanks you for your comments. The SDT agrees with your comments, and has modified the requirement. The new language is in Requirement R1 Part 1.2. "When participating in verbal Operating Communications and using alpha-numeric identifiers, use accurate alpha-numeric clarifiers."</p>		
Transmission System Operations	Disagree	<p>As stated in Question #1, the definition of "Interoperability Communication" needs further clarification. Directives, notifications, directions, instructions, orders, and other reliability operating information needs to be clearly defined, including what it consists of and when it is to be utilized.</p>
<p>Response: The SDT thanks you for your comments. The SDT has eliminated "Interoperability Communication" and is proposing the new term "Operations Communications." "Operations Communications" are communications instructing a change to, or maintenance of, the state, status, output, or input of an Element or Facility of the Bulk Electric System. The use of a phonetic clarifier will be required during verbal "Operating Communications."</p>		
NERC Staff	Disagree	<p>As stated in response to Question 2, NERC staff agrees with the proposal, but would offer the following modification in order to add clarity. We recommend that the phrase "when issuing directives, notifications, directions, instructions, orders or other reliability related operating information that involves alpha-numeric information during verbal Interoperability Communications" be replaced with "when verbal Operating Communications with alpha-numeric information is involved." This would require using the definition of Operating Communications offered in the response to Question 1. This will hopefully eliminate the need to further define what communication is or is not included in the phrase "directives, notifications, directions, instructions, orders or other reliability related operating information."</p>
<p>Response: The SDT thanks you for your comments. The SDT has eliminated "Interoperability Communication" and is proposing the new term "Operations Communications." "Operations Communications" are communications instructing a change to, or maintenance of, the state, status, output, or input of an Element or Facility of the</p>		

Organization	Yes or No	Question 7 Comment
<p>Bulk Electric System. The use of a phonetic clarifier will be required during verbal “Operating Communications.” The SDT agrees with your second comment, and has modified the requirement. The new language is in Requirement R1 Part 1.2. “When participating in verbal Operating Communications and using alpha-numeric identifiers, use accurate alpha-numeric clarifiers.”</p>		
<p>British Columbia Transmission Corporation</p>	<p>Disagree</p>	<p>BCTC's position: R6 requiring the use of North American Treaty Organization (NATO) phonetic alphabet adds no value and will only cause confusion. Presently an instruction would be issued as: “At Kelly Lake open 5CB4” R6 it will now become: “At Kelly Lake open Fife Charlie Bravo Fow-er”</p>
<p>Response: The SDT thanks you for your comments. The SDT believes that clarity around verbally conveyed alpha-numeric information is critical for ensuring clear and effective real-time communication among BES operating entities. The SDT intends for R6 (new R1 Part 1.2 in the second draft of the standard) to apply to unique facility/element identifiers and not commonly used acronyms such as “CB” for circuit breaker. If “5CBR” is the unique facility/element identifier, then it would apply.</p>		
<p>New York State Reliability Council</p>	<p>Disagree</p>	<p>Comments: While NYSRC understands the benefit of utilizing a phonetic alphabet, we question the designation of a specific phonetic alphabet. This prescriptive requirement may result in absurd non-compliance reports, such as, using “Dog” for “D” instead of “Delta”. R6 requires the use of the alphabet when issuing information, but not in the repeat back step. This may be an oversight. Also Does the RC in its communication utilize the abbreviation for the threat type, e.g. PSEA, or does the RC use the NATO-Alphabet? If NATO, then the example in Attachment 1 should state this need.</p>
<p>Response: The SDT thanks you for your comments. The SDT agrees, and has modified the Requirement to allow for any accurate alpha numeric clarifier. The SDT believes that the proposed new requirements in the second draft of the COM-003-01 standard address the concern mentioned in the comment concerning use of the requirement only during the issuing and not the repeating back. The RC would only be required to communicate the abbreviation of verbally conveyed alpha-numeric information using an accurate alpha numeric clarifier or the NATO alphabet if it was during verbal “Operating Communications”. The SDT intends for new Requirement R1 Part 1.2 to apply to unique facility/element identifiers and not commonly used acronyms.</p>		
<p>Power South Energy</p>	<p>Disagree</p>	<p>Completely unnecessary to require each operator to learn and use the NATO alphabet for situations that may occur on a very limited basis.</p>
<p>Response: The SDT thanks you for your comments.</p>		

Organization	Yes or No	Question 7 Comment
<p>The SDT has modified the requirement. The new language is in requirement R1 Part 1.2. “When participating in verbal Operating Communications and using alpha-numeric identifiers, use accurate alpha-numeric clarifiers.”</p> <p>The SDT believes that clarity around verbally conveyed alpha-numeric information is critical for ensuring clear and effective real-time communication among BES operating entities.</p>		
<p>Tri-State Generation & Transmission Assoc.</p>	<p>Disagree</p>	<p>Directive is not defined. This poses an undue burden on the operators, which does not improve the reliability of the BES. NERC should only concern themselves with issues related to maintaining the reliability of the BES.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The current draft version of COM-003-1 does not use or define the term “directive” that task is assigned to the RCSDT – Project 2006-06. See Question 6.</p>		
<p>Entergy Services</p>	<p>Disagree</p>	<p>Entergy has 2 concerns with this requirement as written.</p> <p>First, the use of the NATO phonetic alphabet is overly prescriptive to convey alpha-numeric information. For instance, if I use the word “baker” instead of “bravo” in my communications, I would have still successfully communicated the letter “B” to the person receiving my communication. My communication may have supported reliable interconnected operations. However, according to this requirement, I would still have violated the standard.</p> <p>Second, the requirement as written is very broad, applying not just to directives, but also to “notifications, directions, instructions, orders and other reliability related operating information”. These terms are not defined, so I would assume that this covers Reliability Directives, and everything else. If the industry supports using a phonetic alphabet, it should be limited just to directives containing alpha-numeric information. Again, the requirement to use the NATO phonetic alphabet imposes a significant operational burden, creates a human error trap for operating personnel, and does not improve reliability. It should not be included in the new standard.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT has modified the requirement. The new language is in Requirement R1 Part 1.2. “When participating in verbal Operating Communications and using alpha-numeric identifiers, use accurate alpha-numeric clarifiers.”</p> <p>The SDT also agrees with your second comment and has modified the proposed standard by restricting the requirement’s applicability to only those alpha numeric identifiers used during verbal “Operating Communications”.</p>		

Organization	Yes or No	Question 7 Comment
ERCOT ISO	Disagree	ERCOT ISO does not agree with this approach, which seems to be overly prescriptive (“directives, notifications, directions, instructions, orders, or other reliability related information”), which goes beyond the purpose of “during alerts and emergencies”. This is an administrative requirement that would increase communication timing and possibly negatively affect reliability. If using a common language and three part communication for directives is effective this is not required.
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT agrees and has modified the proposed standard by restricting the requirement's applicability to only those alpha numeric identifiers used during verbal “Operating Communications”.</p> <p>The SDT believes that clarity for verbally conveyed alpha-numeric information is critical for ensuring clear and effective real-time communication between BES operating entities.</p> <p>Note that the scope of this standard is not limited to communications related to alerts and emergencies.</p>		
SERC OC&SOS Standards Review Group	Disagree	First, please note that “NATO” does not stand for North American Treaty Organization; it stands for North Atlantic Treaty Organization. Use of the NATO phonetic alphabet should be considered a “best practice” and should not be included as a requirement in a reliability standard. One failure, such as saying “Baker” instead of “Bravo”, results in a severe violation without any impact on system reliability. This group is concerned that operating personnel will be focused on using the correct word rather than managing the power system.
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT agrees that NATO stands for “North Atlantic Treaty Organization” and that “American” was used in error.</p> <p>The SDT has modified the requirement. The new language is in Requirement R1 Part 1.2. “When participating in verbal Operating Communications and using alpha-numeric identifiers, use accurate alpha-numeric clarifiers.”</p> <p>The SDT believes that clarity around verbally conveyed alpha-numeric information is critical for ensuring clear and effective real-time communication between BES operating entities.</p>		
Transmission Owner	Disagree	FPL believes that though aspiring to use a single strict phonetic alphabet is important, it is more important to ensure that ease of communication takes precedence especially under emergency conditions. As such, this requirement should be written more as a best practice or guideline. FPL believes this requirement could be improved by stating that under such emergency conditions, the NATO phonetic alphabet can be used as a base-line reference but that usage of ad-hoc phonetic alternatives that achieve the same real-time communication goal

Organization	Yes or No	Question 7 Comment
		can also be used.
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT has modified the requirement. The new language is in Requirement R1 Part 1.2. “When participating in verbal Operating Communications and using alpha-numeric identifiers, use accurate alpha-numeric clarifiers.”</p> <p>The SDT believes that clarity around verbally conveyed alpha-numeric information is critical for ensuring clear and effective real-time communication between BES operating entities during routine or emergency conditions.</p>		
Pepco Holdings, Inc. - Affiliates	Disagree	Having system operators potentially struggle to remember the NATO phonetic alphabet during communications rather than focus on the communication and managing the bulk electric system itself is in contradiction with the purpose of the standard. Use of the NATO phonetic alphabet should be considered a “best practice” and should not be included as a requirement in a reliability standard. One failure, such as saying “Baker” instead of “Bravo”, results in a severe violation without any impact on system reliability.
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT has modified the requirement. The new language is in Requirement R1 Part 1.2. “When participating in verbal Operating Communications and using alpha-numeric identifiers, use accurate alpha-numeric clarifiers.”</p> <p>The SDT believes that clarity for verbally conveyed alpha-numeric information is critical for ensuring clear and effective real-time communication between BES operating entities</p>		
Florida Municipal Power Agency (FMPA) and some members	Disagree	How strict are the NATO pronunciations? E.g., “Uniform” is designated as pronouncing the “i” as a long “ee”, most people I know do not do that. Similarly, there are multiple pronunciations of “Quebec”, “Sierra”, “Victor”, “Three”, “Four”, “Five”, and “Nine” to name a few, yet one pronunciation is specified. We presume that if the wrong pronunciation is used in the current draft of the standard, there would be a violation, currently at a high risk factor and high severity level, which seems rather severe. FMPA suggests that the SDT revisit this with an eye towards at least not penalizing someone for saying “five” instead of “fife”, and possibly with an eye towards saying “‘F’ as in ‘frank’” is OK, rather than being strict with NATO nomenclature.
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT has modified the requirement. The new language is in Requirement R1 Part 1.2. “When participating in verbal Operating Communications and using alpha-numeric identifiers, use accurate alpha-numeric clarifiers.”</p>		
Sunflower Electric	Disagree	I don't feel we should use NATO phonetic alphabet. Use something in common use in the USA

Organization	Yes or No	Question 7 Comment
Power Corp.		<p>Response: The SDT thanks you for your comments.</p> <p>The NATO phonetic alphabet is commonly used in the US and Canada. Some examples are the military, police and fire protection, medical industry and the air traffic control system. The BES, as in the previous examples, is a critical system requiring the same level of communication clarity. The SDT has modified the requirement. The new language is in Requirement R1 Part 1.2. “When participating in verbal Operating Communications and using alpha-numeric identifiers, use accurate alpha-numeric clarifiers.”</p>
Progress Energy Carolina, Inc	Disagree	<p>NATO stands for North Atlantic Treaty Organization. This proposed requirement is a best practice and does not serve to increase the reliability of the BES.</p> <p>Response: The SDT thanks you for your comments.</p> <p>The SDT agrees that NATO stands for “North Atlantic Treaty Organization” and that “American” was used in error. The SDT has modified the requirement. The new language is in Requirement R1 Part 1.2. “When participating in verbal Operating Communications and using alpha-numeric identifiers, use accurate alpha-numeric clarifiers.”</p> <p>The SDT disagrees with your second comment. The NATO phonetic alphabet is commonly used in the US and Canada. Some examples are the military, police and fire protection, medical industry and the air traffic control system. The BES, as with the previous examples, is a critical system requiring the same level of communication clarity. The use of the NATO alphabet provides this clarity which prevents miscommunication which reduces the risk of a mishap.</p>
NextEra Energy Resources, LLC	Disagree	<p>NextEra believes that though aspiring to use a single strict phonetic alphabet may be beneficial it is more important to ensure that ease of communication takes precedent especially under emergency conditions. The requirement for 3-part communication already ensures that understanding between two parties occurs. Moreover, it is overly burdensome to require that the phonetic alphabet be used in all communications which would include communications related to mundane interactions between interconnected parties and that might broadly fit the mold of the “interoperability” definition but not truly require the formality or rigor commanded by a phonetic approach.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The second draft version of COM-003-1 proposes in Requirement R1 Part 1.2 to use an accurate alpha-numeric clarifier such as the NATO phonetic alphabet during verbal Operating Communications when alpha-numeric identifiers are involved. Beyond that, its use to clarify confusion over a communication, mundane or otherwise, is not discouraged but is not required.</p>		

Organization	Yes or No	Question 7 Comment
Pacific Northwest Small Utilities Comment Group	Agree	No Comment
Response: The SDT acknowledges No Comment.		
NorthWestern Energy	Disagree	NorthWestern appreciates the opportunity to comment. The requirement, as drafted, appears to open the possibility of sanctions for incorrect use of the NATO phonetic alphabet during any verbal communication between entities. The use of the NATO phonetic alphabet would be difficult when performing local switching orders to field personnel. NorthWestern suggests that the requirement be reworded to state that entities “shall use a phonetic code (e.g., the NATO phonetic alphabet) when necessary, to verify accurate reception of alpha-numeric information.”
Response: The SDT thanks you for your comments. The SDT agrees and has modified the requirement. The new language is in Requirement R1 Part 1.2. “When participating in verbal Operating Communications and using alpha-numeric identifiers, use accurate alpha-numeric clarifiers.”		
Western Area Power Administration	Disagree	Not everyone is familiar with the NATO phonetic alphabet, so it would be another thing for operators to have to memorize or to always have in front of them to refer to.
Response: The SDT thanks you for your comments. The SDT believes that operators will not have difficult problems adapting to the NATO alphabet. With proper training and familiarization it becomes a natural part of an individual’s vocabulary. The SDT also agrees with overall industry comment and has modified the Requirement (R1 Part 1.2 in the second draft of the standard) to require use of an accurate alpha-numeric clarifier such as the NATO phonetic alphabet during verbal Operating Communications when alpha-numeric identifiers are involved.		
ISO New England Inc.	Disagree	Not only does this requirement attempt to determine HOW entities operate with their various footprints, it may change the way many Markets are structured. What is the difference between using the word “Zebra” instead of “Zulu” to signify the letter “Z”? And, why would this be enforceable? Perhaps this would be better served as a guideline document rather than an enforceable Requirement. Also, many organizations may have established communications protocols which are functioning properly and making a change may actually hinder reliable operations by introducing unnecessary confusion.
Response: The SDT thanks you for your comments.		

Organization	Yes or No	Question 7 Comment
<p>The SDT does not understand how this requirement would change market structure, please provide details for us to address.</p> <p>The SDT has modified the requirement. The new language is in Requirement R1 Part 1.2. “When participating in verbal Operating Communications and using alpha-numeric identifiers, use accurate alpha-numeric clarifiers.”</p> <p>" So “Zebra” instead of “Zulu” to signify the letter “Z” would be acceptable, “Xerox” instead of “Zulu” to signify the letter “Z” would be non compliant.</p>		
Northeast Utilities	Disagree	<p>Not only does this requirement attempt to determine HOW entities operate with their various footprints, it may change the way many Markets are structured. What is the difference between using the word “Zebra” instead of “Zulu” to signify the letter “Z”? And, why would this be enforceable. Perhaps this should be a guideline document rather than an enforceable Requirement. There is no reliability need for this Requirement.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT does not understand how this requirement would change market structure, please provide details for us to address.</p> <p>The SDT has modified the requirement. The new language is in Requirement R1 Part 1.2. “When participating in verbal Operating Communications and using alpha-numeric identifiers, use accurate alpha-numeric clarifiers.”</p> <p>“Zebra” instead of “Zulu” to signify the letter “Z” would be acceptable, “Xerox” instead of “Zulu” to signify the letter “Z” would be non compliant.</p> <p>The SDT believes there is a critical need for this requirement. The eclectic pattern of communication protocols that exist and those that do not exist across the BES is an ever present risk for miscommunication, which breeds mishaps.</p>		
Westar Energy	Disagree	<p>One of the more common or ad-hoc phonetic alphabets which are easier to remember could be a better fit since these communications happen infrequently. Having operators potentially struggle to remember the NATO phonetic alphabet during communications rather than focus on the communication itself is in contradiction with the stated purpose of the standard.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT has modified the requirement. The new language is in Requirement R1 Part 1.2. “When participating in verbal Operating Communications and using alpha-numeric identifiers, use accurate alpha-numeric clarifiers.”</p>		
Ameren	Disagree	<p>Requirement should be revised to say that Attachment 2 needs to be used when single alphabetic characters, or when needed for clarity, are needed in communications. If we have a Bee Hollow-51 circuit, that is alpha-numeric information. But we wouldn’t support that Bee Hollow needs to be spelled out as Bravo-Echo-Echo-space-Hotel</p>
<p>Response: The SDT thanks you for your comments.</p>		

Organization	Yes or No	Question 7 Comment
<p>The SDT intends for R6 to apply to a unique Facility/Element identifier and not commonly used acronyms such as “CB” for circuit breaker; or names such as “Bee Hollow”. In the case of this comment the identifier “Bee Hollow Five One” would meet the requirement.</p>		
<p>Southern Company Transmission</p>	<p>Disagree</p>	<p>Southern Company supports the SERC SOS comments. SERC SOS comments: Use of the NATO phonetic alphabet should be considered a “best practice” and should not be included as a requirement in a reliability standard. One failure, such as saying “Baker” instead of “Bravo”, results in a severe violation without any impact on system reliability. This group is concerned that operating personnel will be focused on using the correct word rather than managing the power system.</p> <p>The SDT has modified the requirement. The new language is in Requirement R1 Part 1.2. “When participating in verbal Operating Communications and using alpha-numeric identifiers, use accurate alpha-numeric clarifiers.”</p> <p>Southern Company comments: This requirement should be removed from the standard. Requirement 5 requires understanding by both parties during communication. Requirement 6 requires common identifiers which will enhance the chances of both parties understanding communications. Although using the phonetic alphabet may be necessary some times in order to gain understanding between two parties it should not be required. If both parties understand A as well as they do Alpha the reliability of the system has not been affected. No entity should be found in non-compliance of a Reliability Standard if reliability was not affected.</p> <p>The SDT believes that clarity around verbally conveyed alpha-numeric information is critical for ensuring clear and effective real-time communication between BES operating entities.</p>
<p>Response: The SDT thanks you for your comments.</p>		
<p>E.ON U.S. LLC</p>	<p>Disagree</p>	<p>The entire standard should only apply to emergency operations, not all communications. If it is the intent that the requirements of this standard apply not only to control room operators but also field personnel (line crews, substation crews, etc.) then E ON U.S. is not in favor of using the NATO phonetic alphabet. The confusion that this change could create in real-time operations outweighs the BES reliability benefit. E ON U.S. suggests that if the objective is to avoid confusion over similarly pronounced words, use of an ad-hoc phonetic alphabet would more easily address the concern. E ON U.S. is also concerned that the attention paid to “how” orders are given and acknowledged may well detract from “what” it is responsible entities are attempting to do. Are responsible entities supposed to spell out each number and word using the phonetic alphabet? The drafting team should be more specific as to what is meant by “alpha-numeric information.”</p>

Organization	Yes or No	Question 7 Comment
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT believes that clarity around verbally conveyed alpha-numeric information is critical for ensuring clear and effective real-time communication between BES operating entities during routine and emergency operating conditions.</p> <p>The SDT has modified the requirement. The new language is in Requirement R1 Part 1.2. “When participating in verbal Operating Communications and using alpha-numeric identifiers, use accurate alpha-numeric clarifiers.”</p> <p>The SDT intends for Requirement R1 Part 1.2 to apply to unique Facility/Element alpha-numeric (numbers and letter codes or designators) identifiers and not commonly used acronyms such as “CB” for circuit breaker or names such as “Bee Hollow”. For example the identifier for Bee Hollow 51A circuit would be “Bee Hollow Five One Alpha” circuit.</p>		
American Municipal Power	Agree	The NATO Phonetic alphabet is easy to learn and use. Most people can learn it on their own much faster than it will take the SDT to read all of the comments for COM-003.
<p>Response: The SDT thanks you for your comments and your observation.</p>		
The Empire District Electric Company	Disagree	The NATO phonetic alphabet is too descriptive as a requirement. A common phonetic alphabet where both parties understand the communication should be a better requirement and left up to the parties in communication with each other as common across the USA.
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT disagrees that use of the NATO phonetic alphabet is too descriptive as a requirement, but has modified the requirement based on stakeholder suggestions that other alpha-numeric identifiers should also be acceptable. The new language is in Requirement R1 Part 1.2. “When participating in verbal Operating Communications and using alpha-numeric identifiers, use accurate alpha-numeric clarifiers.”</p>		
PSEG Companies	Disagree	The PSEG Companies agree with the concerns expressed in the comments filed by the PJM System Operations Subcommittee (SOS) Group.
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT believes that clarity around verbally conveyed alpha-numeric information is critical for ensuring clear and effective real-time communication between BES operating entities.</p> <p>The SDT has modified the Requirement. The new language is in Requirement R1 Part 1.2. “When participating in verbal Operating Communications and using alpha-numeric identifiers, use accurate alpha-numeric clarifiers.”</p> <p>The SDT believes that adequate training, familiarity with and use of the phonetic alphabet will avoid and eliminate struggles for operators.</p>		

Organization	Yes or No	Question 7 Comment
MRO MRO NERC Standards Review Subcommittee	Disagree	<p>The required use of the phonetic alphabet should be documented in the Entities CPOP per our comments to question #3. While this requirement may represent a good utility practice or even a best practice, it is not so necessary to be enforceable through enforceable requirements.</p> <p>All information passed by a NERC Certified System operator falls under the scope of Requirement 6: “directives, notifications, directions, instructions, orders or other reliability related operating information”. Based on that definition, all communication would fall under this Requirement.</p> <p>The NATO phonetic alphabet does not allow for the use of numbers ten and beyond. An entity WOULD be found non compliant for saying “open switch fourteen bravo”. We do not believe this is reasonable as it adds nothing to the reliability of the BES is too prescriptive and all encompassing and could potentially confuse or slow down the communication process.</p> <p>We recommend that use of the NATO phonetic alphabet be included in the NERC operator certification training program and removed from this standard .As we recommended above, the term “directive” should be replaced with “Reliability Directive”.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT has elected to eliminate the requirement to have a CPOP based on Industry Comment.</p> <p>The SDT believes that clarity around verbally conveyed alpha-numeric information is critical for ensuring clear and effective real-time communication between BES operating entities and warrants being an enforceable requirement.</p> <p>The SDT has modified the requirement. The new language is in Requirement R1 Part 1.2. “When participating in verbal Operating Communications and using alpha-numeric identifiers, use accurate alpha-numeric clarifiers.”</p> <p>Numbers over nine are referred to by each individual digit for example 14 = “one, four”; 2559 = “two, five, five, nine” when communicating a unique alpha-numeric identifier. The SDT has modified the proposed standard by restricting the requirement's applicability only to verbal “Operating Communications.”</p> <p>The SDT respectfully considers your recommendation to remove this from the standard and include it in the NERC operator certification training program but elects to keep this as a requirement because it enhances reliability by reducing human error. Its integration into the NERC operator certification training program is a very good recommendation, but beyond the scope of the drafting team.</p>		
ATC and ITC	Disagree	<p>The use of the phonetic alphabet should be documented in the Entities CPOP per our comments to question #3. We do not agree that it needs to be included in Requirement 5 because it is too prescriptive and all encompassing and could potentially confuse or slow down the communication process. As we recommended in question 6 the</p>

Organization	Yes or No	Question 7 Comment
		term “directive” should be replaced with “Reliability Directive”.
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT has elected to eliminate the requirement to have a CPOP based on Industry Comment.</p> <p>The SDT believes that clarity around verbally conveyed alpha-numeric information is critical for ensuring clear and effective real-time communication between BES operating entities. Many critical process industries utilize the NATO alphabet because it is effective in preventing mishaps due to miscommunication. Some examples are the military, medical and air traffic fields. The SDT feels strongly that operation of the BES is a similar critical process and should employ a proven communication protocol.</p> <p>The SDT has modified the second draft of the COM-003 standard by restricting the requirement's applicability only to verbal “Operating Communications”.</p> <p>The RCSDT is developing the term “Reliability Directive” in project 2006-06. The terms, “directive” and “Reliability Directive” are not used in the second draft of COM-003.</p>		
PPL	Disagree	The way this could be interpreted is that every type of communication between every applicable entity would have to use the NATO phonetic alphabet. This would be impractical since many of the current communications do not require this level of specificity.
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT has required the use of the NATO Alphabet or an accurate alpha numeric clarifier to clarify alpha numeric identifiers during verbal “Operating Communications” because operations on the BES do require this level of specificity.</p>		
Georgia Transmission Corp	Disagree	This is an operational burden and could easily cause a violation by using a different common identifier. If used, it should only apply to Reliability Directives.
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT has modified the requirement. The new language is in Requirement R1 Part 1.2. “When participating in verbal Operating Communications and using alpha-numeric identifiers, use accurate alpha-numeric clarifiers.”</p> <p>The proposed standard is required during both emergency operating states and also normal operating states.</p>		
California Independent System Operator	Disagree	This requirement is a best practice. Maybe the standardized alpha-numeric communication is something that companies should be required to train their personnel on, maybe it could even be a requirement of their CharliePapaOscarPapa. As this requirement is literally written a system operator who used the word ‘cat’ instead of the word ‘Charlie’ when giving a directive would violate a sanctionable standard with a VRF of ‘High’ and a VSL

Organization	Yes or No	Question 7 Comment
		of 'Severe'.
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT believes that clarity around verbally conveyed alpha-numeric information is critical for ensuring clear and effective real-time communication between BES operating entities</p> <p>The “Charlie, Papa, Oscar, Papa” requirement has been eliminated.</p> <p>The SDT has modified the requirement. The new language is in Requirement R1 Part 1.2. “When participating in verbal Operating Communications and using alpha-numeric identifiers, use accurate alpha-numeric clarifiers.”</p> <p>The SDT has modified the VRF and VSL to conform to NERC and FERC guidelines.</p>		
Puget Sound Energy	Disagree	<p>This requirement is too burdensome when compared to its benefits. The proposed requirement covers many different types of verbal communication and converts a useful communication protocol into mandatory requirement, which carries with it large potential penalties. Under this requirement, an operator’s use of the phrase “M as in Mary” instead of “M as in Mike” would be violation of NERC reliability standards. The requirement for Three-Part Communications covers most of this ground in a much more useful fashion and ensures parties understand the information. The use of this protocol is a matter that should be left for entities to consider for inclusion in their CPOPs, but should not be a mandatory requirement to use the protocol. Further it is again assumed that based on R1, this information is related to real time. As well further examples of what a real time issuing of a "notification" is and what "other reliability related operation information would be needs to be specified.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT believes that clarity around verbally conveyed alpha-numeric information is critical for ensuring clear and effective real-time communication among BES operating entities. The implementation of the requirement should not be overly burdensome.</p> <p>The SDT has modified the requirement. The new language is in Requirement R1 Part 1.2. “When participating in verbal Operating Communications and using alpha-numeric identifiers, use accurate alpha-numeric clarifiers.”</p> <p>The requirement to have a CPOP has been eliminated.</p> <p>With regard to the value of phonetic alphabet clarification, many critical process industries utilize the NATO alphabet because it is effective in preventing mishaps due to miscommunication. Some examples are the military, medical and air traffic control fields. The SDT feels strongly that operation of the BES is a similar critical process and should employ a proven communication protocol.</p>		

Organization	Yes or No	Question 7 Comment
NIPSCO	Disagree	This should not be a requirement, but could be a suggested option. If one were recorded using the wrong phonetic would that be a compliance violation? This doesn't seem reasonable.
<p>Response: The SDT thanks you for your comments.</p> <p>If you use Baker instead of Bravo for “B” that is compliant. If you use Phase instead of Foxtrot for “F” you would be non compliant.</p> <p>The SDT has modified the requirement. The new language is in Requirement R1 Part 1.2. “When participating in verbal Operating Communications and using alpha-numeric identifiers, use accurate alpha-numeric clarifiers.”</p>		
Manitoba Hydro	Disagree	<p>To using NATO full time</p> <p>1) Being trained or being familiar with NATO Phonetics is a great idea, but should only be implemented, in bad communication connections, or upon request due to accents, quiet voice, fast talk, too loud, unusual request, etc.</p> <p>2) Communication technology for the most part is exceptionally clear, and the regular use of NATO Phonetics would be difficult to implement and time consuming to use. The RC and neighbouring entities are familiar with common terminology between each other.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>1. The SDT believes that clarity around verbally conveyed alpha-numeric information during “Operating Communications” is critical for ensuring clear and effective real-time communication among BES operating entities. The SDT would not discourage its use outside of “Operating Communications” in the context of your comments.</p> <p>2. Communication technology may be exceptionally clear for much of the time, but human factors and natural electromagnetic abnormalities do occur on a frequent basis making it important to have structured and clear communication protocols to prevent miscommunication.</p>		
Xcel Energy	Disagree	<p>Use of the NATO phonetic alphabet should be a best practice not a reliability requirement. We are not convinced that there is any threat to reliability if someone were to use a different phonetic than what is indicated. Additionally, we do not feel that it is necessary to use the phonetic alphabet unless there is an indication that the initial communication has been misunderstood. If the drafting team feels this requirement should remain in the standard, we feel it should be modified to address:</p> <p>1) There should be an exception for approved acronyms, such as NERC, FERC, etc.,</p> <p>The SDT intends for Requirement R1, Part 1.2 in the revised standard to apply to unique Facility/Element alpha-numeric (numbers and letter codes or designators) identifiers and not commonly used acronyms such as “CB” for circuit breaker; or names such as “Bee Hollow”.</p>

Organization	Yes or No	Question 7 Comment
		<p>2) it should only be required upon repeat-back, when the first communication was misunderstood, and It will be required when alpha numeric identifiers are used only during verbal “Operating Communications.”</p> <p>3) Any phonetic alphabet should be acceptable for use, such as military or police, not just NATO's. The SDT has modified the requirement to allow the use of any phonetic alphabet. The new language is in Requirement R1 Part 1.2. “When participating in verbal Operating Communications and using alpha-numeric identifiers, use accurate alpha-numeric clarifiers.”</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT believes that clarity around verbally conveyed alpha-numeric information is critical for ensuring clear and effective real-time communication among BES operating entities.</p> <p>The SDT believes that adequate training, familiarity with and use of the phonetic alphabet will avoid and eliminate confusion among operators. The military, medical and air traffic control fields utilize the NATO alphabet as a proven means of voice communication clarification.</p>		
PJM	Disagree	<p>Use of the NATO phonetic alphabet should be considered a “best practice” and should not be included as a requirement in a reliability standard. One failure, such as saying “Baker” instead of “Bravo”, results in a severe violation without any impact on system reliability. This group is concerned that operating personnel will be focused on using the correct word rather than managing the power system. Also, many organizations may have established communications protocols which are functioning properly and making a change may actually hinder reliable operations by introducing unnecessary confusion.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT believes that clarity around verbally conveyed alpha-numeric information is critical for ensuring clear and effective real-time communication between BES operating entities.</p> <p>The SDT has modified the requirement. The new language is in Requirement R1 Part 1.2. “When participating in verbal Operating Communications and using alpha-numeric identifiers, use accurate alpha-numeric clarifiers.”</p> <p>The SDT believes that adequate training, familiarity with and use of the phonetic alphabet will avoid and eliminate confusion among operators. The NATO alphabet is a proven means of voice communication clarification.</p>		
PJM SOS Comments	Disagree	<p>Use of the NATO phonetic alphabet should be considered a “best practice” and should not be included as a</p>

Organization	Yes or No	Question 7 Comment
		<p>requirement in a reliability standard. One failure, such as saying “Baker” instead of “Bravo”, results in a severe violation without any impact on system reliability. This group is concerned that operating personnel will be focused on using the correct word rather than managing the power system. Also, many organizations may have established communications protocols which are functioning properly and making a change may actually hinder reliable operations by introducing unnecessary confusion.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT believes that clarity around verbally conveyed alpha-numeric information is critical for ensuring clear and effective real-time communication between BES operating entities.</p> <p>The SDT has modified the requirement. The new language is in Requirement R1 Part 1.2. “When participating in verbal Operating Communications and using alpha-numeric identifiers, use accurate alpha-numeric clarifiers.”</p> <p>The SDT believes that adequate training, familiarity with and use of the phonetic alphabet will avoid and eliminate confusion among operators.</p> <p>The NATO alphabet is a proven means of voice communication clarification.</p>		
Santee Cooper	Disagree	<p>Use of the NATO phonetic alphabet should not be a requirement of this standard. This also adds a layer of complexity to the system operator position that is not necessary.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT disagrees and believes that clarity around verbally conveyed alpha-numeric information is critical for ensuring clear and effective real-time communication between BES operating entities.</p> <p>The SDT has modified the requirement. The new language is in Requirement R1 Part 1.2. “When participating in verbal Operating Communications and using alpha-numeric identifiers, use accurate alpha-numeric clarifiers.”</p>		
Electric Market Policy	Disagree	<p>Use of this adds a lot to verbal communication but has little value. Where either the issuing or receiving party is unsure as to which letter was used, their choice of word to associate with the alphabet need not be dictated by a specific phonetic alphabet. If I am unclear, whether I ask “did you say ‘F’ as in Frank or ‘F’ as in Foxtrot, it is my belief that we will both know that I heard the letter F not the letter S. Using Frank instead of Foxtrot will result in a violation of Requirement R6 which carries a High VRF and a Severe VSL; even though there would be no impact on effective communication. There is no compelling reason to require every operator in North America to learn and use the NATO phonetic alphabet. It would be overkill to do so, and it could create some really bizarre conversations. For example, consider a TOP in the eastern time zone who calls his RC (also in the eastern time zone) at 10:00 A.M.to confirm that a line that tripped earlier that morning will be ready to switch back in service at</p>

Organization	Yes or No	Question 7 Comment
		<p>10:35. Taken to the extreme, a strict interpretation of R6 and R4 (the CST requirement) would say that the TOP operator would have to state the estimated time of restoration as “niner tree fife, Alpha Mike, Charlie Sierra Tango”. There is no need for that.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT believes that clarity around verbally conveyed alpha-numeric information is critical for ensuring clear and effective real-time communication among BES operating entities.</p> <p>The SDT has modified the requirement. The new language is in Requirement R1 Part 1.2. “When participating in verbal Operating Communications and using alpha-numeric identifiers, use accurate alpha-numeric clarifiers.”</p> <p>The SDT intends for Requirement R1, Part 1.2 in the revised standard to apply to unique Facility/Element alpha-numeric (numbers and letter codes or designators) identifiers and not commonly used acronyms such as “CB” for circuit breaker; or names such as “Bee Hollow”. Since your example is not a unique Facility/Element alpha-numeric identifier it would read as “0-9-3-5 Central Standard Time” You would not use am/pm as R3 (new Requirement R1 Part 1.1.2) requires the 24 hour format.</p> <p>Please note under proposed R3 (new requirement R1 Part 1.1.3) The SDT has offered an alternative to the single time zone.</p>		
National Grid	Disagree	<p>Using the NATO phonetic alphabet is useful, but to what extent? Does it apply to facility identifications, key words, or every letter of every word? Is it up to the judgment of the operators? If so how will compliance be monitored? If during a communication, personnel used a term different than that in the NATO alphabet i.e. D as in Dog rather than Delta however, the listener understood the message and the correct action was taken would there still be the possibility of a compliance violation?</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT has modified the requirement. The new language is in Requirement R1 Part 1.2. “When participating in verbal Operating Communications and using alpha-numeric identifiers, use accurate alpha-numeric clarifiers.”</p> <p>D as in “Dog” rather than “Delta” would be compliant; F as in “phase” rather than “Foxtrot” would be non compliant.</p> <p>The revised requirement applies during verbal “Operating Communications”, when alpha-numeric information is involved.</p>		
NRECA RTF Members	Disagree	<p>We agree that using the NATO phonetic alphabet is a more accurate form of communication for issuing and responding to a directive during verbal Interoperability Communications. However, other forms of phonetic alphabet communications could be utilized to achieve the same results and entities should not be forced to use only the NATO phonetic alphabet. As stated in question 6 we are concerned about the undefined term “directive”. In addition to the NATO alphabet, did the drafting team consider including the 10-Code system many utilities use</p>

Organization	Yes or No	Question 7 Comment
		for verbal communication (ex: 10-4)? If not, why not and if so, why not included?
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT has eliminated “Interoperability Communication” and is proposing the new term “Operations Communications.” “Operations Communications” are communications with the intent to change or maintain the state, status, output, or input of an Element or Facility of the Bulk Electric System. The use of a phonetic clarifier will be required only during verbal “Operating Communications” that involve alpha-numeric identifiers.</p> <p>The SDT has modified the Requirement. The new language is in Requirement R1 Part 1.2. “When participating in verbal Operating Communications and using alpha-numeric identifiers, use accurate alpha-numeric clarifiers.”</p> <p>The SDT believes the ten code system is not appropriate for use with unique Facility/Element alpha numeric identifiers. The ten code system varies over North America and may not exist in Canada. The NATO alphabet, as an example, is more universal, consistent and more applicable.</p>		
Duke Energy	Disagree	We believe that R6 should be deleted, because it is focused on the details of the “how” rather than the “what” in communications. The key is accurate 3-part communications for “directives”, as required by R5. R6 is far too broad in the communications that would be included. Also, we believe that there is no reasonable way to implement, self-certify or audit compliance with this requirement.
<p>Response: The SDT thanks you for your comments.</p> <p>The OPCP SDT was chartered to develop Communication Protocols for Operating Personnel. The SDT proposes that the second draft of the standard is more focused on “what” protocols to use in specific situations.</p> <p>The SDT has modified the proposed standard by restricting the requirement's applicability only to verbal “Operating Communications” that involve alpha-numeric identifiers.</p> <p>The measure (now contained within M1 but previously M6) includes types of evidence that may be used to demonstrate compliance with this requirement.</p>		
South Carolina Electric and Gas	Disagree	We believe this should only be required when issuing Reliability Directives.
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT has modified the proposed standard by restricting the requirement's applicability only to verbal “Operating Communications” which can include normal, alert and emergency operating conditions and involve alpha-numeric identifiers.</p>		

Organization	Yes or No	Question 7 Comment
NYSEG	Disagree	While it is perhaps a good practice to include the use of phonetics to avoid miscommunications, it should be left up to each entity to determine the appropriateness of adopting such a practice (e.g., field switching, internal instructions, etc.) and should not be included in the Requirement, especially if Interoperability is not further clarified/defined.
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT has eliminated “Interoperability Communication” and is proposing the new term “Operations Communications.” “Operations Communications” are communications with the intent to change or maintain the state, status, output, or input of an Element or Facility of the Bulk Electric System. The SDT has modified the proposed standard by restricting the requirement’s applicability (Requirement R1, Part 1.2 in the revised standard) only to verbal “Operating Communications” alpha-numeric identifiers.</p>		
Long Island Power Authority	Disagree	While LIPA understands the benefit of utilizing a phonetic alphabet, we question the designation of a specific phonetic alphabet. This prescriptive requirement may result in absurd non-compliance reports, such as, using “Dog” for “D” instead of “Delta”. R6 requires the use of the alphabet when issuing information, but not in the repeat back step. This may be an oversight. Also Does the RC in its communication utilize the abbreviation for the threat type, e.g. PSEA, or does the RC use the NATO-Alphabet? If NATO, then the example in Attachment 1 should state this need.
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT has modified the requirement to allow for the "NATO phonetic alphabet or another “accurate alpha numeric clarifier.”, so D as in “Dog” rather than “Delta” would be compliant; F as in “Phase” rather than “Foxtrot” would be non compliant.</p> <p>The SDT intends for Requirement R1, Part 1.2 in the revised standard to apply to unique Facility and Element alpha numeric identifiers and not commonly used acronyms such as “PSEA” for Physical Security Emergency Alert.</p> <p>The SDT has modified the proposed standard by restricting Part 1.2 of the revised requirement’s applicability only to verbal “Operating Communications” that involve alpha-numeric identifiers.</p>		
We Energies	Disagree	While R6 could be recommended as a good utility practice when communicating Reliability Directives, it is not appropriate to enforce it as a requirement for all communications. The focus of the standard should be on the achievement of clear communications, with individual organizations retaining some freedom to implement practices appropriate for their own unique situations. If Violation Severity Levels will be “high” as indicated in Attachment 1-COM-003-1, then the standard must be much more specific as to what constitutes “directives, notifications, directions, instructions, orders or other reliability operating information”. Assigning a high Violation

Organization	Yes or No	Question 7 Comment
		<p>Severity Level to the failure to use a specific phonetic alphabet (NATO) instead of to a failure to use any phonetic alphabet seems unreasonable and is likely to cause as much confusion as failing to use any sort of phonetic pronunciation. If attachment 2 is utilized, it should only be required for situations where Attachment 1 applies. As noted in question 2, R6 should not apply to a TSP or LSE.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT believes that clarity around verbally conveyed alpha-numeric identification information is critical for ensuring clear and effective real-time communication among BES operating entities and should be enforceable.</p> <p>The SDT agrees with your concerns over applicable communications and has modified the proposed standard by restricting Part 1.2 of the revised requirement's applicability only to verbal "Operating Communications" that involve alpha-numeric identifiers.</p> <p>The new language is Requirement R1 Part 1.2. "When participating in verbal Operating Communications and using alpha-numeric identifiers, use accurate alpha-numeric clarifiers."</p> <p>The SDT has removed the TSPs and LSEs because they were not bound by this requirement in the originating SAR.</p>		
Dynergy	Disagree	<p>While this Requirement may represent a good utility practice in certain situations, it is not necessary to be used in all verbal Interoperability Communications and is certainly not necessary to be included as an enforceable Requirement. Imagine the situation in which an operator says "A as in apple" instead of using the NATO Alpha. Even though the listener should clearly be able to discern the correct meaning, the speaker's company could be sanctioned even if the correct actions were taken as a result of the clear communication. There is no reliability need for this Requirement.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT has modified the proposed standard by deleting the term Interoperability Communications and adding the new term - "Operating Communications".</p> <p>The SDT has modified the requirement. The new language is in Requirement R1 Part 1.2. "When participating in verbal Operating Communications and using alpha-numeric identifiers, use accurate alpha-numeric clarifiers."</p> <p>"A as in apple" instead of using the NATO "Alpha" would be compliant; F as in "Phase" rather than "Foxtrot" would be non compliant.</p> <p>The SDT believes there is a reliability need for this requirement and that it will enhance reliability by clarifying communications to prevent misunderstandings that could cause mishaps on the BES.</p>		
Hydro-Québec	Disagree	<p>While this Requirement may represent a good utility practice in certain situations, it is not necessary to be used in</p>

Organization	Yes or No	Question 7 Comment
TransEnergie		<p>all verbal Interoperability Communications, and is certainly not necessary to be included as an enforceable Requirement.</p> <p>For example, a situation in which an operator says “A” as in apple” instead of using the NATO Alpha. Even though the listener should clearly be able to discern the correct meaning, the speaker’s company could be sanctioned even if the correct actions were taken as a result of the clear communication. The objective of good communications is to assure that the parties understand each other. The statement “... shall use the NATO phonetic alphabet” doesn’t make sense for North America. If the Real-Time Operator states “breaker 6-North,” under the NATO phonetic alphabet that would be unacceptable, because the operator did not use the appropriate NATO term “breaker 6-November,” even though the “N” on the one line diagram refers to the “North” breaker and not the “South” breaker. Many organizations may have established communications protocols which are working well. Making a change may actually hinder reliable operations by introducing unnecessary confusion and questioning. Not only does this requirement attempt to determine HOW entities operate with their various footprints, it may change the way many Markets are structured. What is the difference between using the word “Zebra” instead of “Zulu” to signify the letter “Z”? And, why would this be enforceable. Perhaps this should be a guideline document rather than an enforceable Requirement. There is no reliability need for this Requirement. Furthermore, the use of three part communication eliminates the need for a mandatory use of NATO phonetic alphabet.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT believes there is a reliability need for this requirement (Requirement R1, Part R1.2 in the revised standard) and that clarity around verbally conveyed alpha-numeric information is critical for ensuring clear and effective real-time communication between BES operating entities.</p> <p>The new language is in Requirement R1 Part 1.2. “When participating in verbal Operating Communications and using alpha-numeric identifiers, use accurate alpha-numeric clarifiers.”</p> <p>“A as in apple” instead of using the NATO “Alpha” would be compliant; F as in “Phase” rather than “Foxtrot” would be non compliant.</p> <p>With regard to “breaker 6-North,” under the NATO phonetic alphabet and the revision for a correct phonetic alphabet substitute that would be acceptable as long as the operator used either NATO term “breaker 6-November,” or correct phonetic alphabet substitute “breaker 6-North.” If the operator used the term “breaker 6-“N” (pronounced “en”) he or she would be non compliant.</p>		
Midwest ISO Standards Collaborators	Disagree	<p>While this Requirement may represent a good utility practice in certain situations, it is not necessary to be used in all verbal Interoperability Communications and is certainly not necessary to be included as an enforceable Requirement. Imagine the situation in which an operator says “A as in apple” instead of using the NATO Alpha.</p>

Organization	Yes or No	Question 7 Comment
		<p>Even though the listener should clearly be able to discern the correct meaning, the speaker’s company could be sanctioned even if the correct actions were taken as a result of the clear communication. There is no reliability need for this Requirement.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT believes that clarity around verbally conveyed alpha-numeric information is critical for ensuring clear and effective real-time communication between BES operating entities.</p> <p>The SDT has modified the requirement. The new language is in Requirement R1 Part 1.2. “When participating in verbal Operating Communications and using alpha-numeric identifiers, use accurate alpha-numeric clarifiers.”</p> <p>“A as in apple” instead of using the NATO “Alpha” would be compliant; F as in “Phase” rather than “Foxtrot” would be non compliant.</p>		
<p>Northeast Power Coordinating Council</p>	<p>Disagree</p>	<p>While this Requirement may represent a good utility practice in certain situations, it is not necessary to be used in all verbal Interoperability Communications, and is certainly not necessary to be included as an enforceable Requirement. For example, a situation in which an operator says “A as in apple” instead of using the NATO Alpha. Even though the listener should clearly be able to discern the correct meaning, the speaker’s company could be sanctioned even if the correct actions were taken as a result of the clear communication. The objective of good communications is to assure that the parties understand each other. The statement “... shall use the NATO phonetic alphabet” doesn’t make sense for North America. If the Real-Time Operator states “breaker 6-North,” under the NATO phonetic alphabet that would be unacceptable, because the operator did not use the appropriate NATO term “breaker 6-November,” even though the “N” on the one line diagram refers to the “North” breaker and not the “South” breaker. Many organizations may have established communications protocols which are working well. Making a change may actually hinder reliable operations by introducing unnecessary confusion and questioning.</p> <p>Not only does this requirement attempt to determine HOW entities operate with their various footprints, it may change the way many Markets are structured. What is the difference between using the word “Zebra” instead of “Zulu” to signify the letter “Z”? And, why would this be enforceable. Perhaps this should be a guideline document rather than an enforceable Requirement. There is no reliability need for this Requirement.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT believes that clarity around verbally conveyed alpha-numeric information is critical for ensuring clear and effective real-time communication between BES operating entities and enhances reliability.</p>		

Organization	Yes or No	Question 7 Comment
<p>The SDT has modified the requirement. The new language is in Requirement R1 Part 1.2. “When participating in verbal Operating Communications and using alpha-numeric identifiers, use accurate alpha-numeric clarifiers.”</p> <p>“A as in apple” instead of using the NATO “Alpha” would be compliant; F as in “Phase” rather than “Foxtrot” would be non compliant.</p> <p>With regard to “breaker 6-North,” under the NATO phonetic alphabet and the revision for a correct phonetic alphabet substitute that would be acceptable as long as the operator used either NATO term “breaker 6-November,” or correct phonetic alphabet substitute “breaker 6-North.” If the operator used the term “breaker 6-“N” (pronounced “en”) he or she would be non compliant.</p>		
Great River Energy	Disagree	<p>While this requirement may represent a good utility practice or even a best practice, it is not so necessary to be enforceable through enforceable requirements. The NATO phonetic alphabet does not allow for the use of numbers ten and beyond. An entity WOULD be found non compliant for saying OPEN SWITCH FOURTEEN BRAVO. GRE does not believe this is reasonable as it adds nothing to the reliability of the BES. It is too prescriptive and all encompassing and could potentially confuse or slow down the communication process especially in an emergency situation.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT believes that clarity around verbally conveyed alpha-numeric information is critical for ensuring clear and effective real-time communication between BES operating entities.</p> <p>The SDT has modified the requirement. The new language is in Requirement R1 Part 1.2. “When participating in verbal Operating Communications and using alpha-numeric identifiers, use accurate alpha-numeric clarifiers.”</p> <p>If the nomenclature of the switch on the single line is “14B” the requirement would have it read as “One, Four Bravo.” The number “2347” would be read as “Two, Three, Four, Seven” under R6 (new R1 Part 1.2).</p> <p>The SDT believes that adequate training, familiarity with and use of the phonetic alphabet will avoid and eliminate confusion among operators.</p>		
Independent Electricity System Operator	Disagree	<p>While this requirement may represent a good utility practice or even a best practice, it is not so necessary to be enforceable through sanctionable requirements. Similar to R2, having to use the NATO phonetic alphabet is overly prescriptive and forces system operators to learn and remember “languages” in addition to the power system language. System operators should not be penalized for using some means other than the NATO phonetic alphabet to communicate equally effectively. We see no short coming in operations that would require these additional requirements and that the added complexity and additional training requirements may deteriorate reliability.</p>
<p>Response: The SDT thanks you for your comments.</p>		

Organization	Yes or No	Question 7 Comment
<p>The SDT believes that clarity around verbally conveyed alpha-numeric information is critical for ensuring clear and effective real-time communication among BES operating entities.</p> <p>The SDT has modified the requirement. The new language is in Requirement R1 Part 1.2. “When participating in verbal Operating Communications and using alpha-numeric identifiers, use accurate alpha-numeric clarifiers.”</p> <p>The SDT believes that adequate training, familiarity with and use of the phonetic alphabet will avoid and eliminate confusion among operators.</p>		
<p>IRC Standards Review Committee</p>	<p>Disagree</p>	<p>While this requirement may represent a good utility practice or even a best practice, it is not so necessary to be enforceable through enforceable requirements. Imagine the situation in which an operator says “A as in apple” instead of using the NATO Alpha. Even though the listener should clearly be able to discern the correct meaning, the speaker’s company could be sanctioned even if the correct actions were taken as a result of the clear communication. Also, many organizations may have established communications protocols which are functioning properly and making a change may actually hinder reliable operations by introducing unnecessary confusion.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT believes that clarity around verbally conveyed alpha-numeric information is critical for ensuring clear and effective real-time communication among BES operating entities.</p> <p>The SDT has modified the requirement. The new language is in Requirement R1 Part 1.2. “When participating in verbal Operating Communications and using alpha-numeric identifiers, use accurate alpha-numeric clarifiers.”</p> <p>“A as in apple” instead of using the NATO “Alpha” would be compliant; F as in “Phase” rather than “Foxtrot” would be non compliant.</p> <p>The SDT believes that adequate training, familiarity with and use of the phonetic alphabet will avoid and eliminate confusion among operators.</p>		
<p>FirstEnergy</p>	<p>Disagree</p>	<p>While we agree that using the NATO phonetic alphabet may be a best practice, we feel that it is not practical to regulate its use. This requirement is too prescriptive. The focus should be on the correct understanding of verbal communication which will be accomplished via Three-party Communication, whether an entity uses NATO or "A as in Apple, B as in Boy", this should not be codified within the standard. Substantiating compliance with this requirement is not reasonable to expect, practical to prove, nor does it produce an improvement in reliability.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT believes that clarity around verbally conveyed alpha-numeric information is critical for ensuring clear and effective real-time communication between BES operating entities.</p> <p>The SDT has modified the requirement. The new language is in Requirement R1 Part 1.2. “When participating in verbal Operating Communications</p>		

Organization	Yes or No	Question 7 Comment
		<p>and using alpha-numeric identifiers, use accurate alpha-numeric clarifiers.”</p> <p>“A as in apple” instead of using the NATO “Alpha” would be compliant; F as in “Phase” rather than “Foxtrot” would be non compliant.</p> <p>The SDT believes that adequate training, familiarity with and use of the phonetic alphabet will avoid and eliminate confusion among operators.</p>

- 8. Requirement R7 of the draft COM-003-1 states, “Each Responsible Entity shall use pre-determined, mutually agreed upon line and equipment identifiers during for all verbal and written Interoperability Communications.” Do you agree with this proposal? If not, please explain in the comment area.**

Summary Consideration:

Most stakeholders who responded to this comment disagreed with the proposal.

Many commenters said the terms “. . . pre-determined, mutually agreed upon . . .” are confusing and difficult to measure. The SDT agrees and modified the requirement to remove the term “mutually agreed upon”.

Commenters indicated a general consensus for the mandatory use of line and equipment identifiers applying only to interface Elements or Facilities, not Elements or Facilities internal to the footprint of the entity. The SDT agreed, and modified the standard to apply only to interface Elements and Facilities.

There were additional comments that uniform and mutually agreed line and equipment identifiers should not be mandated so long as the identifiers are pre-determined. The SDT agrees documentation of mutual agreement is not necessary, so long as the identifiers are pre-determined, understood and used during Operating Communications. The SDT has modified the requirement to require use of the name specified by the owner(s) of the Transmission interface Element/Facility when referring to that Element/Facility.

Many commenters indicated Requirement R7 should not have been applicable to TSPs and LSEs. The SDT agrees, and has removed TSPs and LSEs from the standard to be consistent with the approved SAR.

Additional commenters indicated the word “equipment” as used in Requirement R7 was too broad. The standard has been modified to use the defined terms “Element” and “Facility” instead.

Other commenters indicated Requirement R7 addressed a planning function already included in TOP-002, and should not be included in COM-003. While the SDT agrees that TOP-002-2a R18 is a planning function, the team believes communications between entities would be improved when use of pre-determined identifiers is required for interface Elements and Facilities. The SDT proposes the concept of R7 be retained and transferred to R1 Part 1.1.4.

Some additional comments were received indicating the previously posted standard was too prescriptive in specifying “how” to communicate, instead of “what.” The SDT proposes that the second draft of COM-003 provides identifies “what” communications protocols to use and when to use them.

Some commenters also indicated the proposed standard was unnecessary and would distract operators from reliably controlling the system. The SDT disagreed based on Blackout Task Force Report recommendation 26, which calls for tightening communication to improve reliability.

Question 8 mis-states R7 in that it inserts the word “all” in the question and it was not in R7. The performance that was specified in Requirement R7 in the initial draft of COM-003 has been modified so it is more narrowly focused and allows greater flexibility in meeting the reliability objective. See Requirement R1, Part 1.1.4 in the second draft of COM-003:

R1. Each Reliability Coordinator, Transmission Operator, Balancing Authority, Generator Operator and Distribution Provider shall use the following communications protocols:: [*Violation Risk Factor: Medium*] [*Time Horizon: Real-time Operations*]

1.1. When participating in oral or written Operating Communications:

- 1.1.1. Use the English language when communicating between functional entities, unless another language is mandated by law or regulation.
- 1.1.2. Use the 24-hour clock format when referring to clock times.
- 1.1.3. When communicating with one or more entities in different time zones, include the time, local time zone and indicate whether time is daylight saving time or standard time.
- 1.1.4. When referring to a Transmission interface Element or a Transmission interface Facility, use the name specified by the owner(s) for that Transmission interface Element or Transmission interface Facility. .

Organization	Yes or No	Question 8 Comment
British Columbia Transmission Corporation	Agree	
Bureau of Reclamation	Agree	
ExxonMobil Research and Engineering	Agree	
Georgia	Agree	

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Organization	Yes or No	Question 8 Comment
Transmission Corp		
Hydro-Quebec TransEnergie	Agree	
Northeast Power Coordinating Council	Agree	
Northeast Utilities	Agree	
Old Dominion Electric Cooperative	Agree	
Oncor Electric Delivery	Agree	
Orange and Rockland Utilities, Inc.	Agree	
PacifiCorp	Agree	
PEF	Agree	
PowerSouth Energy	Agree	
South Carolina Electric and Gas	Agree	
Sunflower Electric Power Corp.	Agree	
Sunflower Electric Power Corporation	Agree	
Transmission System Operations	Agree	

Organization	Yes or No	Question 8 Comment
Westar Energy	Agree	
Western Area Power Administration	Agree	
Progress Energy Carolina, Inc	Disagree	
American Electric Power	Disagree	AEP does not believe it is appropriate for the standard to have been edited to remove the clarification that neighboring BAs use uniform line identifiers when communicating information about their lines and to add the addition requirement of using pre-determined "equipment" identifiers.
<p>Response: The SDT thanks you for your comments. The SDT developed Requirement R1 Part 1.1.4 in the second draft of the standard to require use of the name specified by the owner(s) of a Transmission interface Element/Facility, when referring to that Element/Facility. The term "interface" is used instead of neighboring for greater clarity.</p>		
FirstEnergy	Disagree	Although we agree with moving this current TOP-002 R18 requirement to this standard, we question the use of the phrase "mutually agreed upon". It is not clear how the line and equipment identifiers will be mutually agreed upon and how this will be measured. We suggest using similar wording from the current TOP-002 R18 and reword COM-003-1 R7 as follows: "Each Reliability Coordinator, Balancing Authority, Transmission Owner, Transmission Operator, Generator Operator, Transmission Service Provider, Load Serving Entity and Distribution Provider shall use uniform line and equipment identifiers for verbal and written communications."
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT modified the requirement to remove the term "mutually agreed upon". The SDT developed Requirement R1 Part 1.1.4 in the second draft of the standard to require use of the name specified by the owner(s) of a Transmission interface Element/Facility, when referring to that Element/Facility during verbal and written Operating Communications.</p>		
Puget Sound Energy	Disagree	As discussed in Question 2, Requirement 18 should be removed from TOP-002-2 (or any successor standard) upon adoption of this standard if this requirement is included in this standard. Further the term mutually agreed implies that a discussion has occurred prior to the need to verbalize or write these types of communications. The additional specificity of "pre-determined" is duplicative or leads one to think there is formal guidance as to what the "identifier" should be. Remove "pre-determined". It also begs the question of timeframe which could bring interpretation issues during an audit.

Organization	Yes or No	Question 8 Comment
<p>Response: The SDT thanks you for your comments.</p> <p>The drafting team asserts that communications between entities would be tightened when use of pre-determined identifiers are required for interface Elements/Facilities. The SDT proposes for R7 (R1 Part 1.1.4 in the second draft of this standard) to remain on its own merit. The SDT modified the requirement to remove the term “mutually agreed upon”.</p> <p>The SDT modified the requirement so that during oral and written Operating Communications entities must use the name specified by the owner(s) of a Transmission interface Element/Facility when referring to that Element/Facility.</p>		
Bonneville Power Administration	Disagree	BPA Would like further clarification about what is meant by “pre-determined, mutually agreed upon line and equipment identifiers”. Is it a specified format no matter which part of the system is being used, or is it only for 115 kV and above as it applies to LSE’s and TSP’s. If it only refers to Transmission equipment above 115 kV, then BPA would likely agree.
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT modified the requirement to remove the term “mutually agreed upon”. The SDT developed Requirement R1 Part 1.1.4 in the second draft of the standard to require use of the name specified by the owner(s) of a Transmission interface Element/Facility, when referring to that Element/Facility. The new term “Operating Communications” applies when communications involve actions relative to Elements or Facilities of the Bulk Electric System.</p>		
Ameren	Agree	But how does CMEP process check this “mutually agreed”. Much more work needs to be done with this requirement and measures to address this.
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT modified the requirement to remove the term “mutually agreed upon”.</p>		
California Independent System Operator	Disagree	CAISO Comments; This Requirement is problematic as it doesn’t actually steer towards standardization. It mandates that companies have potentially scores of agreements agreeing on terms with each party it interacts with, all of which may be different. It ensures the system operator will spend more time ensuring terminology is correct for a given inter-company communication and once again, less time actually reliably operating the system. Standardization can only occur in a meaningful manner at very minimum, the interconnection level. Also the language in the VSL section uses “mutually understood”, which the CAISO supports as opposed to the requirement and measure use “mutually agreed upon”. Mutually agreed upon is overly prescriptive.
<p>Response: The SDT thanks you for your comments.</p>		

Organization	Yes or No	Question 8 Comment
<p>The SDT does not agree there will more time spent ensuring terminology is correct for a given inter-company communication and less time actually reliably operating the system.</p> <p>The SDT developed Requirement R1 Part 1.1.4 in the second draft of the standard to require use of the name specified by the owner(s) of a Transmission interface Element/Facility, when referring to that Element/Facility. The SDT modified the requirement and VSLs to be consistent with each other.</p> <p>The SDT modified the requirement to remove the term “mutually agreed upon” which should address your concern on multiple agreements.</p>		
NYSEG	Agree	COM-003-1 R7 is more clearly defined than TOP-002 R18 in that R7 and associated M7 speak only to written and verbal Interoperability Communication, where TOP-002 R18 and M10 dictate a more extensive use of the identifier. The adoption of a more narrow purpose is preferred.
<p>Response: The SDT thanks you for your comments.</p>		
New York State Reliability Council	Agree	Comments: NYSRC notes that R7 in the draft Standard does not match R2 in this question. Specifically the word ALL is not in the Standard.
<p>Response: The SDT thanks you for your comments. The SDT appreciates the observation and the word “all” is not in the requirement. It should not have been in the question.</p>		
Duke Energy	Disagree	Delete this requirement. See our response to Question #2 above.
<p>Response: The SDT thanks you for your comments. Please see the response to Question #2.</p>		
ERCOT ISO	Disagree	Does the phrase ‘mutually agreed upon line and equipment identifiers’ mean that identifiers do not have to be identical, but that all parties understand the equipment discussed? If this is the general understanding, then no further comment, otherwise, please clarify. Although the related bullet item in the Background Information section describes that they do not have to be identical, many auditors many only look at the requirement language
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT modified the requirement to remove the term “mutually agreed upon”.</p> <p>The SDT developed Requirement R1 Part 1.1.4 in the second draft of the standard to require use of the name specified by the owner(s) of a Transmission interface Element/Facility, when referring to that Element/Facility. The SDT would expect a single pre-determined name for each interface Element/Facility to reduce the potential for confusion among operators.</p>		

Organization	Yes or No	Question 8 Comment
Pacific Northwest Small Utilities Comment Group	Disagree	DPs and LSEs are typically users, not owners or operators of interconnected BES equipment per the registry criteria. DPs and LSEs should be removed from this requirement.
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT appreciates the comments with regards to concerns related to including DPs and LSEs that do not own or operate facilities that are a part of the BES. The SDT has removed the TSPs and LSEs because they were not bound by this requirement in the originating SAR. However, the SDT believes that DPs carry out actions related to the reliability of the Bulk Electric System such as voltage reduction and load shedding. Several existing standards contain requirements concerning operating communications that TSPs, DPs and LSEs must presently comply with that would be governed by the protocols of COM-003-1. It should be noted that the requirements of COM-003-1 are only applicable to “Operating Communications.” To the extent that these entities do not operate or do not take actions that change or maintain the state, status, output, or input of an Element or Facility of the Bulk Electric System, COM-003-1 would not apply.</p>		
MRO NERC Standards Review Subcommittee	Disagree	Field personnel may not have access to the predetermined agreed to line and equipment identifiers. Requiring universal use of these identifiers could lead to confusion with field personnel within and between companies. This could lead to a decrease in the reliability and safety of the BES.As written R7 is expanding the requirement for agreed upon identifiers. We believe it is not necessary or required to have agreed upon equipment identifiers between companies as long as the line identifiers have been agreed upon.TOP-002 R18 states that BA, TOP, GOP TSP and LSE shall use uniform line identifiers when referring to transmission facilities of an interconnected network. COM-003-1, R7 states that each RC, BA, TO, TOP, GOP, TSP, LSE and DP shall use pre-determined, mutually agreed upon line and equipment identifiers for verbal and written Interoperability Communications. TOP-002 allowed the TOP to communicate what the line identifiers were via a list and use during communications. The new requirement implies that the parties must agree upon the line identifiers and that agreement must be documented. We believe the requirement should require the exchange of line identifiers but not impose that they be mutually agreed upon.
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT developed Requirement R1 Part 1.1.4 in the second draft of the standard to require use of the name specified by the owner(s) of a Transmission interface Element/Facility, when referring to that Element/Facility.</p> <p>The new term “Operating Communications” applies when communications involve actions relative to Elements or Facilities of the Bulk Electric System.</p>		

Organization	Yes or No	Question 8 Comment
<p>The SDT modified the requirement to remove the term “mutually agreed upon”.</p>		
<p>Florida Municipal Power Agency (FMPA) and some members</p>	<p>Agree</p>	<p>For clarity, a NERC Glossary defined term is more appropriate than “line or equipment” identifiers, such as “Facility” or “Element” identifiers’ VRF of “High” is not appropriate. Note that TOP-002-2, R18, which this requirement retires, was “Medium”.</p>
<p>Response: The SDT thanks you for your comments. The SDT changed “equipment” to Element or Facility. The SDT has modified the VRFs and VSLs to comply with approved NERC and FERC guidelines. The SDT believes the new assignments (Medium VRF for each of the requirements in the second draft of the standard) more accurately classify the VRFs assigned to the Requirements in COM-003-1.</p>		
<p>Transmission Owner</p>	<p>Disagree</p>	<p>FPL believes that R7 should be withdrawn as it repeats TOP-002 R18 requirements. Please refer to comments on Q3.</p>
<p>Response: The SDT thanks you for your comments. SDT feels that this requirement is appropriate under COM-003. The use of the names specified by the owner(s) of Transmission interface Elements and Transmission interface Facilities during oral and written Operating Communications supports the purpose of COM-003 by preventing miscommunication. Please see response to Q3.</p>		
<p>American Municipal Power</p>	<p>Agree</p>	<p>How many substations have the same name? Unique identifiers easily and inexpensively eliminate confusion and errors.</p>
<p>Response: The SDT thanks you for your comments.</p>		
<p>The Empire District Electric Company</p>	<p>Disagree</p>	<p>I would suggest a more efficient method of designating common pre-determined line and equipment identifiers through the Reliability Coordinator. As similar to the response earlier. A definition of "Equipment" is needed as well.</p>
<p>Response: The SDT thanks you for your comments. The SDT believes your recommendation has merit but may be viewed by some stakeholders as overly prescriptive. The SDT developed Requirement R1 Part 1.1.4 in the second draft of the standard to require use of the name specified by the owner(s) of a Transmission interface Element/Facility, when referring to that Element/Facility.</p>		

Organization	Yes or No	Question 8 Comment
E.ON U.S. LLC	Disagree	<p>In the absence of evidence that the lack of common identifiers is an imminent and continuing risk to BES reliability, it does not make sense to have operators addressing urgent, real-time situations that bear significant penalty risk should they refer to a BES element by something other than the common identifier. The operator focus at such times should be on resolving the situation not avoiding penalties over nomenclature. Is it the intent of the requirement that the common identifiers be the same for all neighboring parties, all of whom must “agree” to the identification? If not, then an element might be referred to by one identifier with Party A, another with Party B, and so on, which might well defeat the purpose of the requirement. If it is required that there be a single identifier, then all neighbors would have to agree upon the identifier constrained as each may be by, for example, the formatting limitation of their respective SCADA/EMS systems. Cost to modify software to accommodate common identifiers could be significant and NERC should weigh these costs and the aforementioned operational risks against the perceived incremental improvements to the BES reliability.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The Blackout Report Recommendation #26 states, communication protocols should be tightened especially those for alerts and emergency communications. FERC Order 693 P531 directed that communication protocols be tightened and suggested a new COM Reliability Standard as an acceptable approach. The SAR for this SDT charged the team to “tighten communication protocols, especially for communications during alerts and emergencies.” Additionally the SAR required “the use of specific communication protocols, enabling information to be efficiently conveyed and mutually understood for all operating conditions.”</p> <p>SDT feels that the revised requirement (Requirement R1, Part 1.1.4 in the second draft) is appropriate under COM-003 as the use of identifiers only for interface Elements/Facilities during oral and written Operating Communications supports the purpose of COM-003. A clear knowledge of Facility and Element nomenclature at interface interconnections can only strengthen operator performance through understanding how operating system anomalies could impact their system. It will and has confused operators when they are not familiar with their neighbor’s system and are not prepared to take action to mitigate the disturbance. The SDT would argue that if the operator is not familiar with his or her neighboring system’s Elements and Facilities those operators will likely take even more time to attempt to learn in the “heat of battle.”</p> <p>The SDT disagrees that the cost to modify software would be significant as it would be limited to the interface Elements/Facilities as stated in R1 Part 1.1.4 of the second draft of the standard.</p>		
Kansas City Power & Light	Disagree	<p>Including “equipment” is too broad. This could mean anything and should be limited to transmission devices that could affect the reliable operation of the bulk electric system.</p>
<p>Response: The SDT thanks you for your comments. The SDT modified the requirement so that entities must use the names specified by the owner(s)</p>		

Organization	Yes or No	Question 8 Comment
<p>of Transmission interface Elements and Transmission interface Facilities when referring to those Elements and Facilities.</p>		
<p>Long Island Power Authority</p>	<p>Agree</p>	<p>LIPA notes that R7 in the draft Standard does not match R2 in this question. Specifically the word ALL is not in the Standard.</p>
<p>Response: The SDT thanks you for your comments. The SDT appreciates the observation and the word “all” is not in the requirement. It should not have been in the question.</p>		
<p>Manitoba Hydro</p>	<p>Disagree</p>	<p>Move this new requirement R1.3 in COM-002-2. This is similar to Question 4 and should be treated in the same way: (This requirement is moved from TOP-002-2 R18)</p> <p>1) COM-003-1 R7 “Pre-determined, mutually agreed upon line and equipment identifiers” are all planned definitions.</p> <p>2) COM-003-1 purpose is to “convey information effectively” meaning the use of English, NATO, three-part communication, 24 time format are all verbal aspects to accomplish this purpose and not suited to pre-determined or planned items. a. COM-003-1 R7 appears more appropriate and relevant placed in COM-002-2. COM-002-2’s Purpose is “capabilities for addressing real time emergencies and to ensure communications by personnel are effective”.</p> <p>3) Placing “Pre-determined, mutually agreed upon line and equipment identifiers” in COM-002-2 after R1.1 as R1.3 appears to have more of a chronological approach.</p> <p>i. R1.1 states “conditions that could threaten”</p> <p>ii. R1.2 use “pre defined system conditions”</p> <p>iii. R1.3 use “pre determined equipment identifiers</p> <p>”Conclusion: Remove COM-003-1 R7 and replace in COM-002-2 as R1.3</p>
<p>Response: The SDT thanks you for your comments.</p> <p>SDT respectfully disagrees with shifting what is now Requirement R1, Part 1.1.4 in the second draft of COM-003 to COM-002-2 and feels that Requirement R1, Part 1.1.4 is appropriate under COM-003-1 as the use of pre-determined identifiers only for interface Elements/Facilities during oral and written Operating Communications supports the purpose of COM-003-1.</p>		
<p>NERC Staff</p>	<p>Disagree</p>	<p>NERC staff is unaware of any instance where not having a mutually agreed upon nomenclature has led to an adverse reliability event. Rather than requiring a national database for all line and equipment identifiers, it appears that restricting the list to jointly-owned facilities and tie-line would accomplish the team’s goal. We</p>

Organization	Yes or No	Question 8 Comment
		recommend that the phrase “Interoperability Communications” be replaced with “Operating Communications involving jointly-owned Facilities and tie lines.”
<p>Response: The SDT thanks you for your comments.</p> <p>The requirement does not require a national database. The SDT modified the requirement to use pre-determined identifiers only for interface Elements/Facilities during oral and written Operating Communications. The new term “Operating Communications” applies to Element or Facilities of the Bulk Electric System.</p> <p>The SDT modified the requirement to remove the term “mutually agreed upon”.</p>		
NextEra Energy Resources, LLC	Disagree	NextEra believes that R7 should be withdrawn as it repeats TOP-002 R18 requirements. Please refer to comments on Q3.
<p>Response: The SDT thanks you for your comments.</p> <p>SDT feels that this requirement is appropriate in COM-003 as the use of identifiers only for interface Elements/Facilities during oral and written Operating Communications supports the purpose of COM-003.</p> <p>Please see the response to Q3 comments.</p>		
IRC Standards Review Committee	Disagree	Please confirm our understanding of this requirement. We believe that the SDT intends for the requirement to compel all companies to use the same name for all facilities. If this is the intention, we disagree with the requirement. This may represent a good utility practice but it is not necessary to be a requirement. The key question is: “Do the companies’ personnel understand one another?” If I know that my company refers to a tie-line as Alpha and my neighboring company calls it Beta, I know what he means when communicating to me. That is all that matters.
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT modified the requirement so that entities must use the names specified by the owner(s) of Transmission interface Elements and Transmission interface Facilities when referring to those Elements and Facilities.</p>		
PJM	Disagree	Requirement R7 in draft COM-003-1 came from TOP-002-2, Requirement R18. The original requirement intended that neighboring Balancing Authorities use uniform line identifiers when communicating information about their tie lines. This requirement drops that clarification and introduces the additional requirement to use pre-determined “equipment” identifiers. Having to mutually agree in advance on identifiers for every switch & transformer is another example of a prescriptive requirement whose violation will not affect system reliability,

Organization	Yes or No	Question 8 Comment
		yet will expose entities to large fines. The key question is: “Do the companies’ personnel understand one another?”
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT modified the requirement so that entities must use the names specified by the owner(s) of Transmission interface Elements and Transmission interface Facilities when referring to those Elements and Facilities.</p> <p>The SDT removed the term “mutually agreed upon”.</p> <p>The SDT would respectfully answer your last question “no, not always” and to create a protocol to address that issue is proper.</p>		
PJM SOS Comments	Disagree	Requirement R7 in draft COM-003-1 came from TOP-002-2, Requirement R18. The original requirement intended that neighboring Balancing Authorities use uniform line identifiers when communicating information about their tie lines. This requirement drops that clarification and introduces the additional requirement to use pre-determined “equipment” identifiers. Having to mutually agree in advance on identifiers for every switch & transformer is another example of a prescriptive requirement whose violation will not affect system reliability, yet will expose entities to large fines. The key question is: “Do the companies’ personnel understand one another?”
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT modified the requirement so that entities must use the names specified by the owner(s) of Transmission interface Elements and Transmission interface Facilities when referring to those Elements and Facilities.</p> <p>The SDT modified the requirement to remove the term “mutually agreed upon”.</p> <p>The SDT would respectfully answer your last question “no, not always” and to create a protocol to address that issue is proper.</p>		
PPL	Disagree	Requirement R7 in draft COM-003-1 came from TOP-002-2, Requirement R18. The original requirement intended that neighboring Balancing Authorities use uniform line identifiers when communicating information about their tie lines. This requirement drops that clarification and introduces the additional requirement to use pre-determined “equipment” identifiers. Having to mutually agree in advance on identifiers for every switch & transformer is another example of a prescriptive requirement whose violation will not affect system reliability, yet will expose entities to large fines.
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT modified the requirement so that entities must use the names specified by the owner(s) of Transmission interface Elements and</p>		

Organization	Yes or No	Question 8 Comment
<p>Transmission interface Facilities when referring to those Elements and Facilities. The SDT modified the requirement to remove the term “mutually agreed upon”.</p>		
<p>SERC OC&SOS Standards Review Group</p>	<p>Disagree</p>	<p>Requirement R7 in draft COM-003-1 came from TOP-002-2, Requirement R18. The original requirement intended that neighboring Balancing Authorities use uniform line identifiers when communicating information about their tie lines. This requirement drops that clarification and introduces the additional requirement to use pre-determined “equipment” identifiers. Having to mutually agree in advance on identifiers for every switch & transformer is another example of a prescriptive requirement whose violation will not affect system reliability, yet will expose entities to large fines.</p>
<p>Response: The SDT thanks you for your comments. The SDT modified the requirement so that entities must use the names specified by the owner(s) of Transmission interface Elements and Transmission interface Facilities when referring to those Elements and Facilities. The SDT modified the requirement to remove the term “mutually agreed upon”.</p>		
<p>Great River Energy</p>	<p>Disagree</p>	<p>See comments for Question 2</p>
<p>Response: The SDT thanks you for your comments. Please see response to comments for Q2.</p>		
<p>Santee Cooper</p>	<p>Disagree</p>	<p>See previous comment on Question 2. In addition the use of the words “equipment identifiers” could be interpreted to include all pieces of equipment within a line.</p>
<p>Response: The SDT thanks you for your comments. Please see response to comments for Q2. The SDT modified the requirement so that entities must use the names specified by the owner(s) of Transmission interface Elements and Transmission interface Facilities when referring to those Elements and Facilities.</p>		
<p>Southern Company Transmission</p>	<p>Disagree</p>	<p>Southern Company supports the SERC SOS comments. SERC SOS comments: Requirement R7 in draft COM-003-1 came from TOP-002-2, Requirement R18. The original requirement intended that neighboring Balancing Authorities use uniform line identifiers when communicating information about their tie lines. This requirement drops that clarification and introduces the additional requirement to use pre-</p>

Organization	Yes or No	Question 8 Comment
		determined “equipment” identifiers. Having to mutually agree in advance on identifiers for every switch & transformer is another example of a prescriptive requirement whose violation will not affect system reliability, yet will expose entities to large fines.
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT modified the requirement so that entities must use the names specified by the owner(s) of Transmission interface Elements and Transmission interface Facilities when referring to those Elements and Facilities.</p> <p>The SDT modified the requirement to remove the term “mutually agreed upon”.</p>		
PSEG Companies	Disagree	The PSEG Companies agree with the concerns expressed in the comments filed by the PJM System Operations Subcommittee (SOS) Group.
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT modified the requirement so that entities must use the names specified by the owner(s) of Transmission interface Elements and Transmission interface Facilities when referring to those Elements and Facilities.</p> <p>The SDT modified the requirement to remove the term “mutually agreed upon”.</p>		
Entergy Services	Disagree	The requirement as it was written in TOP-002-2 pertained to communication between neighbors for shared lines and facilities. That intent has been lost in this version of the requirement. Also a term “equipment identifiers” has been added, but it is not clear what additional equipment is covered by this requirement, or what reliability concern is being addressed by these changes. Entergy recommends that this requirement be changed to be similar to the language that exists in TOP-002-2 R18 “Neighboring Balancing Authorities, Transmission Operators, Generator Operators, Transmission Service Providers and Load Serving Entities shall use pre-determined mutually agreed upon line identifiers when referring to transmission facilities of an interconnected network.”
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT agrees and has modified the requirement so that entities must use the names specified by the owner(s) of Transmission interface Elements and Transmission interface Facilities when referring to those Elements and Facilities.</p> <p>The new term “Operating Communications” applies when communications involve actions relative to Elements or Facilities of the Bulk Electric System.</p>		
National Grid	Disagree	The way this and TOP-002 R18 requirements are written they could be interpreted to mean that the line identifiers have to be unique. The requirement should be written similar to the bullet on page 7 of the comment

Organization	Yes or No	Question 8 Comment
		<p>form also listed below.”TOP-002 R18. Neighboring Balancing Authorities, Transmission Operators, Generator Operators, Transmission Service Providers and Load Serving Entities shall use uniform line identifiers when referring to transmission facilities of an interconnected network.””Pre-determined Line and Equipment Identifiers: COM-003-1 requires the use of predetermined line and equipment identifiers in Requirement R7 however the Requirement does not stipulate a single/unique identifier as long as all parties mutually agree on the identifier for the line or equipment. The mutual agreement shall be reached in advance of the use of the identifiers as described in the functional entity’s CPOP”</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT modified the requirement so that entities must use the names specified by the owner(s) of Transmission interface Elements and Transmission interface Facilities when referring to those Elements and Facilities.</p> <p>The SDT modified the requirement to remove the term “mutually agreed upon”.</p> <p>In the revised standard the requirement to have a CPOP has been eliminated.</p>		
<p>Tri-State Generation & Transmission Assoc.</p>	<p>Disagree</p>	<p>This is not NERC’s responsibility to define. There are too many lines and too much equipment to identify each as a NERC definition. Definitions are already agreed upon between operating entities.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT modified the requirement so that entities must use the names specified by the owner(s) of Transmission interface Elements and Transmission interface Facilities when referring to those Elements and Facilities.</p> <p>The new term “Operating Communications” applies to Element or Facilities of the Bulk Electric System. The new term “Operating Communications” applies when communications involve actions relative to Elements or Facilities of the Bulk Electric System. It will be the owner’s responsibility to define names for its interface Elements/Facilities.</p>		
<p>Dynegy</p>	<p>Disagree</p>	<p>This may represent a good utility practice but it is not necessary to be included as a Requirement. The key question is: “Do the companies’ personnel understand one another?” If I know that my company refers to a tie-line as Alpha and my neighboring company calls it Beta, I know what he means when communicating to me. That is all that matters. This is a “how” based Requirement that should be eliminated.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT would respectfully answer your question “no, not always” and to create a protocol to address that issue is proper.</p>		

Organization	Yes or No	Question 8 Comment
<p>SDT feels that this requirement is appropriate in COM-003 as the use of pre-determined identifiers only for interface Elements/Facilities during oral and written Operating Communications supports the purpose of COM-003. The SDT is proposing a single predetermined name to reduce the potential for confusion. The SDT developed Requirement R1 Part 1.1.4 in the second draft of the standard to require use of the name specified by the owner(s) of a Transmission interface Element/Facility, when referring to that Element/Facility.</p>		
<p>Independent Electricity System Operator</p>	<p>Disagree</p>	<p>This may represent a good utility practice but it is not necessary to be a requirement. The key is whether or not operation personnel understand one another. Similar comments as in Q4 and Q7 also apply here.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The Blackout Report Recommendation #26 states communication protocols should be tightened, “especially” those for alerts and emergency communications. FERC Order 693 P531 directed that communication protocols be tightened and suggested a new COM Reliability Standard as an acceptable approach. The SAR for this SDT charged the team to “tighten communication protocols, especially for communications during alerts and emergencies.” Additionally the SAR required “the use of specific communication protocols, enabling information to be efficiently conveyed and mutually understood for all operating conditions.”</p> <p>Please see response to comments for Q4 and Q7.</p>		
<p>Midwest ISO Standards Collaborators</p>	<p>Disagree</p>	<p>This may represent a good utility practice but it is not necessary to be included as a Requirement. The key question is: “Do the companies’ personnel understand one another?” If I know that my company refers to a tie-line as Alpha and my neighboring company calls it Beta, I know what he means when communicating to me. That is all that matters. This is a “how” based Requirement that should be eliminated.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT would respectfully answer your question “no, not always” and to create a protocol to address that issue is proper.</p> <p>SDT feels that this requirement is appropriate in COM-003 as the use of pre-determined names only for interface Elements/Facilities during oral and written Operating Communications supports the purpose of COM-003. The SDT is proposing a single predetermined identifier to reduce the potential for confusion.</p>		
<p>NIPSCO</p>	<p>Disagree</p>	<p>This question includes a mis-statement in quotes. This is not what the requirement says. Furthermore, the word "Neighboring" was removed from the TOP-002 R18 which changes the meaning and intent of the requirement. Why not bring in R18 verbatim?</p>
<p>Response: The SDT thanks you for your comments.</p>		

Organization	Yes or No	Question 8 Comment
<p>The SDT appreciates the observation and the word “all” is not in the requirement. It should not have been in the question.</p> <p>The SDT modified the requirement so that entities must use the names specified by the owner(s) of Transmission interface Elements and Transmission interface Facilities when referring to those Elements and Facilities. The SDT decided to leave R18 in TOP-002 because it represents a planning function. Requirement R7 will remain in the second draft of COM 003 as Requirement R1, Part 1.1.4, specifying when to use those identifiers.</p>		
<p>Pepco Holdings, Inc. - Affiliates</p>	<p>Disagree</p>	<p>This requirement came from TOP-002 R18 and is fundamentally different from the new proposed requirement in COM-003-1 R7. TOP-002 R18 states that the BA, TOP, GO, LSE and TSP shall use uniform line identifiers when referring to transmission facilities of an interconnected network. The requirement in COM-003-1 R7 introduces an additional requirement to use pre-determined “equipment” identifiers is another example of a prescriptive requirement that will not impact bulk electric system reliability and will expose entities to large fines. PHI believes the TOP-002 R18 could be included in COM-003-1 but included as defined in TOP-002 R18.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT modified the requirement so that entities must use the names specified by the owner(s) of Transmission interface Elements and Transmission interface Facilities when referring to those Elements and Facilities. The SDT is proposing a single predetermined identifier established by the owner of the Element/Facility to reduce the potential for confusion.</p> <p>The SDT decided to leave R18 in TOP-002 because it represents a planning function. Requirement R7 will remain in the second draft of COM 003 as Requirement R1, Part 1.1.4, specifying when to use those identifiers.</p>		
<p>Consumers Energy</p>	<p>Disagree</p>	<p>This requirement is better served under the TOP Standards. The TOP standards already require this (TOP-002-2 R18), and the requirement should not be duplicated.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT decided to leave R18 in TOP-002 because it represents a planning function. Requirement R7 will remain in the second draft of COM 003 as Requirement R1, Part 1.1.4, specifying when to use those identifiers.</p>		
<p>ATC and ITC</p>	<p>Disagree</p>	<p>TOP-002 R18 states that BA, TOP, GOP TSP and LSE shall use uniform line identifiers when referring to transmission facilities of an interconnected network. COM-003 R7 states that each RC, BA, TO, TOP, GOP, TSP, LSE and DP shall use pre-determined, mutually agreed upon line and equipment identifiers for verbal and written Interoperability Communications. TOP-002 allowed the TOP to communicate what the line identifiers were via a list and use during communications. The new requirement implies that the parties must agree upon the line identifiers and that agreement must be documented. ATC believes that the requirement should state that “mutual</p>

Organization	Yes or No	Question 8 Comment
		<p>agreement” allows for multiple identifiers. We believe that this is needed in order to avoid the following issues.</p> <ol style="list-style-type: none"> 1) This clarification will avoid any need for arbitration or formal dispute resolution steps. 2) If the standard does not allow for this provision entities will be forced to deviate from their own line naming convention and will result in entities to modify their drawings, field signs, and SCADA systems.
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT decided to leave R18 in TOP-002 because it represents a planning function. Requirement R7 will remain in the second draft of COM-003 as Requirement R1, Part 1.1.4, specifying when to use those identifiers. The SDT is proposing a single predetermined identifier established by the owner of the Element/Facility to reduce the potential for confusion.</p> <p>The SDT modified the requirement so that entities must use the names specified by the owner(s) of Transmission interface Elements and Transmission interface Facilities when referring to those Elements and Facilities.</p> <p>The new term “Operating Communications” applies when communications involve actions relative to Elements or Facilities of the Bulk Electric System.</p> <p>The SDT modified the requirement to remove the term “mutually agreed upon”.</p>		
We Energies	Disagree	<p>TOP-002-2 R18 requires uniform line identifiers. The wording of R7 and the statement by the SDT that “the Requirement does not stipulate a single/unique identifier as long as all parties mutually agree” is in conflict with TOP-002-2 R18. Allowing multiple line and equipment identifiers to be used does not improve reliability or improve communications in an emergency. TOP-002-2 applies to Transmission Facilities of an Interconnected Network...R7 should do the same for clarity. Having the term “mutually agreed upon” in a standard is unworkable, since it allows a non-cooperative party to disrupt the genuine efforts of others and to exploit unfair leverage in discussions or negotiations. A better approach is having the Transmission Owners develop identifiers for transmission, and Generation Operators develop identifiers for generation. The process should be defined such that comments are solicited and input within a pre-specified convention, and then a specific entity is given the ability to make the final determination. Again, R7 is more appropriate as a best practices recommendation, rather than a requirement.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT decided to leave R18 in TOP-002 because it represents a planning function. Requirement R7 will remain in the second draft of COM 003 as Requirement R1, Part 1.1.4, specifying when to use those identifiers.</p> <p>The SDT modified the requirement to remove the term “mutually agreed upon”.</p>		

Organization	Yes or No	Question 8 Comment
<p>The SDT modified the requirement so that entities must use the names specified by the owner(s) of Transmission interface Elements and Transmission interface Facilities when referring to those Elements and Facilities.</p>		
<p>ISO New England Inc.</p>	<p>Agree</p>	<p>We agree that the stipulation of a single/unique identifier is unnecessary as long as all parties mutually agree on the identifier for the line or equipment, and therefore, support this change to the existing Requirement in TOP-002.</p>
<p>Response: The SDT thanks you for your comments.</p>		
<p>NRECA RTF Members</p>	<p>Agree</p>	<p>We agree using pre-determined, mutually agreed upon line and equipment identifiers during for all verbal and written Interoperability Communications is a more accurate form of communication and should remain as a requirement of this standard.</p>
<p>Response: The SDT thanks you for your comments.</p>		
<p>Xcel Energy</p>	<p>Disagree</p>	<p>We feel this requirement needs clarification, particularly regarding how granular an entity would have to go into the various pieces of equipment/lines. We would also recommend that R7 be modified to not require mutual agreement. We feel the owner (or majority owner) of the line or equipment should be the one setting the identifiers. For example, R7 could instead read like this: "Owner-determined line and equipment identifiers shall be used for all verbal and written Interoperability Communications."</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT modified the requirement so that entities must use the names specified by the owner(s) of Transmission interface Elements and Transmission interface Facilities when referring to those Elements and Facilities.</p> <p>The SDT modified the requirement to use pre-determined identifiers only for interface Elements/Facilities during oral and written Operating Communications. The new term "Operating Communications" applies when communications involve actions relative to Element or Facilities of the Bulk Electric System.</p> <p>The SDT modified the requirement to remove the term "mutually agreed upon".</p>		
<p>Electric Market Policy</p>	<p>Agree</p>	<p>While we agree conceptually, it is our experience that Interoperability Communications concerning BES elements do not usually specifically identify the element or facility when the BA, RC or TOP is communicating with the TSP, LSE or GOP. This may have to do with concerns about Standards/Codes of Conduct or may be because specific identification of the element or facility isn't required in order to communicate action(s) that entity is required to take.</p>

Organization	Yes or No	Question 8 Comment
		<p>Response: The SDT thanks you for your comments.</p> <p>The SDT has eliminated the term Interoperability Communications. The SDT has proposed a new term “Operating Communication”.</p> <p>The SDT modified the requirement so that entities must use the names specified by the owner(s) of Transmission interface Elements and Transmission interface Facilities when referring to those Elements and Facilities. If an interface Element/Facility is not used in the Operating Communication, it would not be subject to this requirement.</p>

9. Attachment 1-COM-003-1 is based upon work performed by the Reliability Coordinator Working Group (RCWG). Do you have any concerns or suggestions for improvement of the attachment? If yes, please provide in the comment area. (If you are involved in the field testing of the Alert Level Guide please share any comments regarding the use of the guideline as it relates to the field test.)

Summary Consideration:

Most stakeholders who responded to this question indicated the attachment needs improvement.

Commenters indicate the alert for the Physical Emergency and the Cyber Alert are nearly identical and should be combined.

Many commenters indicated that Attachment 1 includes actions only for the RC. Therefore, there is no reason to have the other Functions listed as having responsibility for Attachment 1.

Commenters suggest that the use of a “color code” adds an unnecessary level of complexity, adds no value to the Alert Level guidelines, and could result in confusion with Home Land Security terrorist alerts.

Commenters recommend that Distribution Service Provider be changed to Distribution Provider and that change was made.

Commenters stated that the introductory paragraph in COM-003 - Attachment 1 conflicts with the Alert Level Guide.

The SDT reviewed Requirement R2 and the associated attachment and, based on stakeholder comments and additional deliberations, determined that Requirement R2 is not a requirement that defines a “communication protocol” – rather the requirement was attempting to define various alert levels. The SDT removed the requirement from the second draft of the standard as outside the scope of this standard.

Organization	Yes or No	Question 9 Comment
American Municipal Power	Agree	
Bureau of Reclamation	Agree	
Georgia Transmission Corp	Agree	

Organization	Yes or No	Question 9 Comment
Sunflower Electric Power Corporation	Agree	
Western Area Power Administration	Agree	
Oncor Electric Delivery	Disagree	
Orange and Rockland Utilities, Inc.	Disagree	
Pacific Northwest Small Utilities Comment Group	Disagree	
PacifiCorp	Disagree	
Santee Cooper	Disagree	
Transmission Owner	Disagree	
Florida Municipal Power Agency (FMPA) and some members	Agree	<p>(FMPA assumes that commenting "agree" means "yes, we have suggestions for improvement")It seems that the first two tables on Physical and Cyber Emergency Alerts are nearly identical. Why not combine them?</p> <p>On the third table on IROs, are IROs the only emergencies, e.g., how about a capacity / energy emergency? Shouldn't that be in a table as well?</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT reviewed Requirement R2 and the associated attachment and, based on stakeholder comments and additional deliberations, determined that Requirement R2 is not a requirement that defines a “communication protocol” – rather the requirement was attempting to define various alert levels. The SDT removed the requirement from the second draft of the standard as outside the scope of this standard.</p>		
American Electric Power	Agree	<p>“Transmission Loading” should be replaced with “IROs(on the transmission system).” The attachment is very prescriptive as to the notifications are to take place, but not on conveyance of information to be communicated</p>

Organization	Yes or No	Question 9 Comment
		during alerts and emergencies. The attachment is not a good fit in this standard.
<p>Response: The SDT thanks you for your comments. The SDT reviewed Requirement R2 and the associated attachment and, based on stakeholder comments and additional deliberations, determined that Requirement R2 is not a requirement that defines a “communication protocol” – rather the requirement was attempting to define various alert levels. The SDT removed the requirement from the second draft of the standard as outside the scope of this standard.</p>		
Manitoba Hydro	Disagree	<p>1) Attachment 1-COM-003-1 qualifies for all three requirements stated below and would be better suited in this Standard.</p> <p>a.CIP-001-1 Purpose:”sabotage to be reported to appropriate bodies” and includes the following requirements;</p> <p>R1. Procedure for recognition</p> <p>R2. Procedure for communication</p> <p>R3. Response guideline</p> <p>2) OR COM-003-1 Attachment 1 could also be placed in COM-002-2. COM-002-2’s Purpose is “capabilities for addressing real time emergencies and to ensure communications by personnel are effective.”</p> <p>3) COM-003-1 purpose is to “convey information effectively” meaning the use of English, NATO, three-part communication, 24 time format are all verbal aspects to accomplish this purpose and not suited to pre-defined or planned items.</p> <p>4) COM-003-1 Attachment 1 also defines Physical Security threats and notifications which fulfills the purpose of COM-002-2 more thoroughly (then in COM-003-1) and could even be made as an requirement.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT reviewed Requirement R2 and the associated attachment and, based on stakeholder comments and additional deliberations, determined that Requirement R2 is not a requirement that defines a “communication protocol” – rather the requirement was attempting to define various alert levels. The SDT removed the requirement from the second draft of the standard as outside the scope of this standard.</p>		
The Empire District Electric Company	Disagree	Again this attachment is redundant to the NERC Alert process.
<p>Response: The SDT thanks you for your comments.</p> <p>Yes. The SDT reviewed Requirement R2 and the associated attachment and, based on stakeholder comments and additional deliberations, determined that Requirement R2 is not a requirement that defines a “communication protocol” – rather the requirement was attempting to define</p>		

Organization	Yes or No	Question 9 Comment
<p>various alert levels. The SDT removed the requirement from the second draft of the standard as outside the scope of this standard.</p>		
<p>MRO NERC Standards Review Subcommittee</p>	<p>Agree</p>	<p>As Attachment 1 is written it only applies to the RC and is a one-way communications path. The BA, DP, GOP, TOP, and TO are to be notified by the RC but the attachment doesn't state what they are to do with the information. COM-003-1, R1 states that the RC, BA, TO, TOP, GOP, TSP, LSE and DP are to have a CPOP with the elements in R2 through R7, which refer to Attachment 1. If Attachment 1 is applicable only to the RC, as we recommend, there is no reason to have the other Functions listed for Attachment 1. Requirement R2 and Measure M2 need to be revised to be applicable to the RC only. Attachment 1 makes reference to "Distribution Service Providers". There is no definition of a Distribution Service Provider in the NERC Functional Model, and we believe this should either be revised to Distribution Provider, or deleted entirely from the list.</p>
<p>Response: The SDT thanks you for your comments. The SDT reviewed Requirement R2 and the associated attachment and, based on stakeholder comments and additional deliberations, determined that Requirement R2 is not a requirement that defines a "communication protocol" – rather the requirement was attempting to define various alert levels. The SDT removed the requirement from the second draft of the standard as outside the scope of this standard.</p>		
<p>Pepco Holdings, Inc. - Affiliates</p>	<p>Agree</p>	<p>As noted in our comments to Question 4, Attachment 1 has examples for Reliability Coordinators only. It is not a good guide for other Interoperability Communications. Additionally, Attachment 1 identifies the Level 1, Level 2 and Level 3 communications by color codes that are not referenced in the sample messages. PHI finds the addition of color codes to not be helpful and possibly confused with national security Alert Levels. The color coding should be eliminated and examples for entities in addition to the Reliability Coordinator should be included.</p>
<p>Response: The SDT thanks you for your comments. The SDT reviewed Requirement R2 and the associated attachment and, based on stakeholder comments and additional deliberations, determined that Requirement R2 is not a requirement that defines a "communication protocol" – rather the requirement was attempting to define various alert levels. The SDT removed the requirement from the second draft of the standard as outside the scope of this standard.</p>		
<p>Ameren</p>	<p>Agree</p>	<p>As stated earlier, this is an excellent document for RC interactions. But it is wholly unclear how this impacts other entity-to-entity relationships in pre-defining states. And as mentioned having only Attachment 1 seems to ignore the energy balance alerts/emergencies</p>
<p>Response: The SDT thanks you for your comments. The SDT reviewed Requirement R2 and the associated attachment and, based on stakeholder comments and additional deliberations, determined</p>		

Organization	Yes or No	Question 9 Comment
<p>that Requirement R2 is not a requirement that defines a “communication protocol” – rather the requirement was attempting to define various alert levels. The SDT removed the requirement from the second draft of the standard as outside the scope of this standard.</p>		
Entergy Services	Agree	<p>As written, the actions that fall into interoperability communications in requirement 2 are much broader than the set of conditions described in the table in attachment 1. To the extent that the communications are outside of the ones in the table, entities will be non-compliant because their communications are not pre-defined. Recommend that requirement 2 be changed to indicate that “Any Reliability Coordinator or <i>Transmission Operator</i> experiencing a physical security emergency, cyber security emergency, or transmission emergency will communicate their status using the conditions and processes in Attachment 1.” Is this a better write up for R1 (New)</p>
<p>Response: The SDT thanks you for your comments. The SDT reviewed Requirement R2 and the associated attachment and, based on stakeholder comments and additional deliberations, determined that Requirement R2 is not a requirement that defines a “communication protocol” – rather the requirement was attempting to define various alert levels. The SDT removed the requirement from the second draft of the standard as outside the scope of this standard.</p>		
We Energies	Agree	Attachment 1 is written for an RC. Usage of Attachment 1 by entities other than an RC should be clarified.
<p>Response: The SDT thanks you for your comments. The SDT reviewed Requirement R2 and the associated attachment and, based on stakeholder comments and additional deliberations, determined that Requirement R2 is not a requirement that defines a “communication protocol” – rather the requirement was attempting to define various alert levels. The SDT removed the requirement from the second draft of the standard as outside the scope of this standard.</p>		
California Independent System Operator		<p>CAISO Comments; Information regarding the Alert Level Guide field test has not been widely circulated and unproductive as of late. Does not the Alert Level Guide need to be approved prior to any standard which references the guide be approved? What was the outcome of the field testing? Was reliability enhanced? Attachment 1 describes ‘normal, alert, and emergency operating conditions’, then goes on to never use those terms again in any meaningful manner. To further confuse it then mixes color coding of steps with levels. Which is it, Condition Red or Level 3? The attachment directs Reliability Coordinators to make vague notifications to the functional entities in its footprint. It directs Reliability Coordinators to make these vague notifications to entities that do not use, in our case the WECCNet. Is it really anticipated that the Reliability Coordinator calling on the telephone every DP in its footprint with a vague notification will be an enhancement to reliability?</p>
<p>Response: The SDT thanks you for your comments.</p>		

Organization	Yes or No	Question 9 Comment
<p>The SDT reviewed Requirement R2 and the associated attachment and, based on stakeholder comments and additional deliberations, determined that Requirement R2 is not a requirement that defines a “communication protocol” – rather the requirement was attempting to define various alert levels. The SDT removed the requirement from the second draft of the standard as outside the scope of this standard.</p>		
<p>New York State Reliability Council</p>	<p>Agree</p>	<p>Comments: In addition to the response to Question 4, NYSRC does not understand why there are Levels and color designations since only the threat level numeral is being communicated. Attachment 1-Com-003 is very prescriptive in the use pre-defined terminology, colors and levels. There is no benefit (Verbatim?) to specifying the specific terminology. Requiring system Operators to state Colors and Levels would seem to result in slower and more confused communication.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT reviewed Requirement R2 and the associated attachment and, based on stakeholder comments and additional deliberations, determined that Requirement R2 is not a requirement that defines a “communication protocol” – rather the requirement was attempting to define various alert levels. The SDT removed the requirement from the second draft of the standard as outside the scope of this standard.</p>		
<p>E.ON U.S. LLC</p>	<p>Disagree</p>	<p>E.ON U.S. has many concerns with this proposed attachment. The use of color coding and multiple types of alerts adds unnecessary levels of complexity. Any proposed alert level should be consistent throughout the suite of reliability standards, e.g. level 1,2,3. Also, as previously noted in our comment to question 4 above, E.ON U.S. suggests integrating attachment 1 and the relative alert levels into the EOP standards and focusing the COM standards on the requirements of communications protocol.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT reviewed Requirement R2 and the associated attachment and, based on stakeholder comments and additional deliberations, determined that Requirement R2 is not a requirement that defines a “communication protocol” – rather the requirement was attempting to define various alert levels. The SDT removed the requirement from the second draft of the standard as outside the scope of this standard.</p>		
<p>Long Island Power Authority</p>	<p>Agree</p>	<p>In addition to the response to Question 4, LIPA does not understand why there are Levels and color designations since only the threat level numeral is being communicated. Attachment 1-Com-003 is very prescriptive in the use pre-defined terminology, colors and levels. There is no benefit to specifying the specific terminology. Requiring system Operators to state Colors and Levels would seem to result in slower and more confused communication.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT reviewed Requirement R2 and the associated attachment and, based on stakeholder comments and additional deliberations, determined that Requirement R2 is not a requirement that defines a “communication protocol” – rather the requirement was attempting to define various alert</p>		

Organization	Yes or No	Question 9 Comment
<p>levels. The SDT removed the requirement from the second draft of the standard as outside the scope of this standard.</p>		
<p>Bonneville Power Administration</p>	<p>Agree</p>	<p>In Attachment #1 - Operating State Alert Levels, for the Transmission Emergency Alert (TEA) Level 2 definition, a “why” needs to be incorporated into the definition. It appears that the reason we’re going to TEA 2 is to avoid violation of an SOL but it needs to be called out. The color scheme may be confusing with (DHS) Homeland Security’s terrorist alert levels. (The RC makes the notifications to all based upon the Operator’s reported conditions per the scheme.). Suggest only using the Emergency Energy Alert numerical levels versus the color scheme, to avoid confusion with Homeland Security alerts. An example: A red alert is a breakup like 2003 and 1996, not shedding of load to prevent it, The color scheme does not work for this. Agree with Notifications for Physical Security and Cyber Security. Disagree with Notifications for Transmission Emergency Alerts. This appears to be only IROL related, but could progress to SOL. May have too many of these issued. Suggest the following: Yellow - approaching IROL limit; Orange - procedures implemented to correct IROL; RED - shedding firm to respect an IROL.</p>
<p>Response: The SDT thanks you for your comments. The SDT reviewed Requirement R2 and the associated attachment and, based on stakeholder comments and additional deliberations, determined that Requirement R2 is not a requirement that defines a “communication protocol” – rather the requirement was attempting to define various alert levels. The SDT removed the requirement from the second draft of the standard as outside the scope of this standard.</p>		
<p>Hydro-Québec TransEnergie</p>	<p>Agree</p>	<p>It is not clear what value is realized by declaring an alert status particularly with regard to cyber and physical attacks. There do not appear to be any differing actions taken based on the alert status. Given that no differing actions are taken for cyber and physical attacks, it seems it would be more beneficial to use specific information, for example 12 substations have been physically or cyber attacked. This is more meaningful than issuing a red alert that would only indicate more than one site has been attacked.</p> <p>Furthermore, we question the value of communicating the physical and cyber alerts. How does this notification help the BES reliability? Consider the following example. One BA in Oklahoma is 34,323 sq miles. Communicating that an attack occurred in the BA and RC tells other operators that somewhere in Oklahoma an attack occurred. This notification does not present any information that could require actions on the operators’ parts, and will only generate phone calls for more information.</p> <p>Furthermore, PSE and CSE is a type of sabotage already reported in CIP-001 R2. TEA Alerts are already covered in IRO-006-East-1, IRO-009, IRO-010, IRO-014.01 R2.</p> <p>Also it has been the experience of several entities during the field test of these Alert Levels that there are</p>

Organization	Yes or No	Question 9 Comment
		<p>inconsistencies as to when to implement various stages of Alerts, and this introduces more confusion than exists today. Reliability has not been enhanced.</p> <p>Attachment 1 contains a conflict. The last sentence of the opening paragraph of Attachment 1 reads, “The time frame for declaration of these Alert states shall be consistent with the approach used to declare EEAs and would normally apply to Real Time declarations and not forecast conditions.” In Transmission Emergency Alerts Condition Yellow, Orange and RED: The Reliability Coordinator or Transmission Operator foresees or is experiencing conditions where all available generation resources are committed to respect the IROL and/or is concerned about its ability to respect the IROL. Foresees is a forecast condition.</p> <p>There is an inconsistency between the inclusion of Attachment 1 and what is stated in the document posted with the standard entitled Disposition of Requirements Identified in the SAR for Operations Communications Protocols as Possibly Needing either Modification or Movement. The document states that the standard focuses on “how to” communicate rather than on specified scenarios of “to whom” or “when to” communicate; however, Attachment 1 does just the opposite. In condition Orange and Red for TEA Level Two/Three, the initial notification requirements are redundant with IRO-006-East-1 R3.2.</p> <p>Under the Make Final Notifications, is curtailed intended to mean canceled or terminated? The term Curtailed in operations generally means cuts for schedules/tags. EEA’s use terminated. Terminated is the preferred term.</p> <p>Distribution Service Providers should be Distribution Provider to be consistent with the Functional Model. Refer to the response to Question #4.</p>
<p>Response: The SDT thanks you for your comments. The SDT reviewed Requirement R2 and the associated attachment and, based on stakeholder comments and additional deliberations, determined that Requirement R2 is not a requirement that defines a “communication protocol” – rather the requirement was attempting to define various alert levels. The SDT removed the requirement from the second draft of the standard as outside the scope of this standard.</p>		
<p>Independent Electricity System Operator</p>	<p>Agree</p>	<p>It is not clear what value is realized by declaring an alert status particularly with cyber and physical attacks. There does not appear to be any differing actions taken based on the alert status. Given that no differing actions are taken for cyber and physical attacks, it seems it would be more beneficial to use specific information such as the number of substations that have been physically or cyber attacked, etc. This is more meaningful than issuing a red alert that would only indicate more than one site has been attacked. Also, please see our comments under Q4.</p>

Organization	Yes or No	Question 9 Comment
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT reviewed Requirement R2 and the associated attachment and, based on stakeholder comments and additional deliberations, determined that Requirement R2 is not a requirement that defines a “communication protocol” – rather the requirement was attempting to define various alert levels. The SDT removed the requirement from the second draft of the standard as outside the scope of this standard. Please see our response to Q4.</p>		
<p>ISO New England Inc.</p>	<p>Agree</p>	<p>It is not clear what value is realized by declaring an alert status particularly with regard to cyber and physical attacks. There do not appear to be any differing actions taken based on the alert status. Given that no differing actions are taken for cyber and physical attacks, it seems it would be more beneficial to use specific information, for example 12 substations have been physically or cyber attacked. This is more meaningful than issuing a red alert that would only indicate more than one site has been attacked.</p> <p>Furthermore, we question the value of communicating the physical and cyber alerts. How does this notification help the BES reliability? Consider the following example. One BA in Oklahoma is 34,323 sq miles. Communicating that an attack occurred in the BA and RC tells other operators that somewhere in Oklahoma an attack occurred. This notification does not present any information that could require actions on the operators’ parts, and will only generate phone calls for more information.</p> <p>Furthermore, PSE and CSE is a type of sabotage already reported in CIP-001 R2. TEA Alerts are already covered in IRO-006-East-1, IRO-009, IRO-010, IRO-014.01 R2.</p> <p>Also it has been the experience of several entities during the field test of these Alert Levels that there are inconsistencies as to when to implement various stages of Alerts, and this introduces more confusion than exists today. Reliability has not been enhanced.</p> <p>Attachment 1 contains a conflict. The last sentence of the opening paragraph of Attachment 1 reads, “The time frame for declaration of these Alert states shall be consistent with the approach used to declare EEAs and would normally apply to Real Time declarations and not forecast conditions.” In Transmission Emergency Alerts Condition Yellow, Orange and RED: The Reliability Coordinator or Transmission Operator foresees or is experiencing conditions where all available generation resources are committed to respect the IROL and/or is concerned about its ability to respect the IROL. Foresees is a forecast condition.</p> <p>In condition Orange and Red for TEA Level Two/Three, the initial notification requirements are redundant with IRO-006-East-1 R3.2.</p>

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		<p>Under the Make Final Notifications, is curtailed intended to mean canceled or terminated? The term Curtailed in operations generally means cuts for schedules/tags. EEA’s use terminated. Terminated is the preferred term. Distribution Service Providers should be Distribution Provider to be consistent with the Functional Model. Refer to the response to Question #4.</p>
<p>Response: The SDT thanks you for your comments. The SDT reviewed Requirement R2 and the associated attachment and, based on stakeholder comments and additional deliberations, determined that Requirement R2 is not a requirement that defines a “communication protocol” – rather the requirement was attempting to define various alert levels. The SDT removed the requirement from the second draft of the standard as outside the scope of this standard.</p>		
<p>Northeast Power Coordinating Council</p>	<p>Agree</p>	<p>It is not clear what value is realized by declaring an alert status particularly with regard to cyber and physical attacks. There do not appear to be any differing actions taken based on the alert status. Given that no differing actions are taken for cyber and physical attacks, it seems it would be more beneficial to use specific information, for example 12 substations have been physically or cyber attacked. This is more meaningful than issuing a red alert that would only indicate more than one site has been attacked.</p> <p>Furthermore, we question the value of communicating the physical and cyber alerts. How does this notification help the BES reliability? Consider the following example. One BA in Oklahoma is 34,323 sq miles. Communicating that an attack occurred in the BA and RC tells other operators that somewhere in Oklahoma an attack occurred. This notification does not present any information that could require actions on the operators’ parts, and will only generate phone calls for more information.</p> <p>Furthermore, PSE and CSE is a type of sabotage already reported in CIP-001 R2. TEA Alerts are already covered in IRO-006-East-1, IRO-009, IRO-010, IRO-014.01 R2.</p> <p>Also it has been the experience of several entities during the field test of these Alert Levels that there are inconsistencies as to when to implement various stages of Alerts, and this introduces more confusion than exists today. Reliability has not been enhanced.</p> <p>Attachment 1 contains a conflict. The last sentence of the opening paragraph of Attachment 1 reads, “The time frame for declaration of these Alert states shall be consistent with the approach used to declare EEAs and would normally apply to Real Time declarations and not forecast conditions.” In Transmission Emergency Alerts Condition Yellow, Orange and RED: The Reliability Coordinator or Transmission Operator foresees or is experiencing conditions where all available generation resources are committed to respect the IROL and/or is concerned about its ability to respect the IROL. Foresees is a forecast condition.</p>

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		<p>There is an inconsistency between the inclusion of Attachment 1 and what is stated in the document posted with the standard entitled Disposition of Requirements Identified in the SAR for Operations Communications Protocols as Possibly Needing either Modification or Movement. The document states that the standard focuses on “how to” communicate rather than on specified scenarios of “to whom” or “when to” communicate; however, Attachment 1 does just the opposite. In condition Orange and Red for TEA Level Two/Three, the initial notification requirements are redundant with IRO-006-East-1 R3.2.</p> <p>Under the Make Final Notifications, is curtailed intended to mean canceled or terminated? The term Curtailed in operations generally means cuts for schedules/tags. EEA’s use terminated. Terminated is the preferred term.</p> <p>Distribution Service Providers should be Distribution Provider to be consistent with the Functional Model. Refer to the response to Question #4.</p> <p>Refer to the response to Question #4.</p>
<p>Response: The SDT thanks you for your comments. The SDT reviewed Requirement R2 and the associated attachment and, based on stakeholder comments and additional deliberations, determined that Requirement R2 is not a requirement that defines a “communication protocol” – rather the requirement was attempting to define various alert levels. The SDT removed the requirement from the second draft of the standard as outside the scope of this standard.</p> <p>Please see our reply to Q4.</p>		
Dynergy	Disagree	<p>It is not clear what value is realized by declaring an alert status particularly with regard to cyber and physical attacks. There do not appear to be any differing actions taken based on the alert status. Given that no differing actions are taken for cyber and physical attacks, it seems it would be more beneficial to use specific information, for example 12 substations have been physically or cyber attacked. This is more meaningful than issuing a red alert that would only indicate more than one site has been attacked.</p> <p>Furthermore, we question the value of communicating the physical and cyber alerts. How does this notification help the BES reliability? Consider the following example. One BA in Oklahoma is 34,323 sq miles. Communicating that an attack occurred in the BA and RC tells other operators that somewhere in Oklahoma an attack occurred. This notification does not present any information that could require actions on the operators’ parts, and will only generate phone calls for more information.</p> <p>Furthermore, PSE and CSE is a type of sabotage already reported in CIP-001 R2. TEA Alerts are already covered in IRO-006-East-1, IRO-009, IRO-010, IRO-014.01 R2.</p>

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		Distribution Service Providers should be Distribution Provider to be consistent with the Functional Model.
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<p>IRC Standards Review Committee</p>	<p>Disagree</p>	<p>It is not clear what value is realized by declaring an alert status particularly with regard to cyber and physical attacks. There do not appear to be any differing actions taken based on the alert status. Given that no differing actions are taken for cyber and physical attacks, it seems it would be more beneficial to use specific information, for example 12 substations have been physically or cyber attacked. This is more meaningful than issuing a red alert that would only indicate more than one site has been attacked.</p> <p>Furthermore, we question the value of communicating the physical and cyber alerts. How does this notification help the BES reliability? Consider the following example. One BA in Oklahoma is 34,323 sq miles. Communicating that an attack occurred in the BA and RC tells other operators that somewhere in Oklahoma an attack occurred. This notification does not present any information that could require actions on the operators’ parts, and will only generate phone calls for more information.</p> <p>Furthermore, PSE and CSE is a type of sabotage already reported in CIP-001 R2. TEA Alerts are already covered in IRO-006-East-1, IRO-009, IRO-010, IRO-014.01 R2.</p> <p>Also it has been the experience of several entities during the field test of these Alert Levels that there are inconsistencies as to when to implement various stages of Alerts, and this introduces more confusion than exists today. It certainly has not enhanced Reliability.</p> <p>Attachment 1 contains a conflict. The last sentence of the opening paragraph of Attachment 1 reads, “The time frame for declaration of these Alert states shall be consistent with the approach used to declare EEAs and would normally apply to Real Time declarations and not forecast conditions.” In Transmission Emergency Alerts Condition Yellow, Orange and RED: The Reliability Coordinator or Transmission Operator foresees or is experiencing conditions where all available generation resources are committed to respect the IROL and/or is concerned about its ability to respect the IROL. Foresees is a forecast condition.</p> <p>In condition Orange and Red for TEA Level Two/Three, the initial notification requirements are redundant with IRO-006-East-1 R3.2.</p> <p>Under the Make Final Notifications, is curtailed intended to mean canceled or terminated? The term Curtailed in</p>

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		<p>operations generally means cuts for schedules/tags. EEA’s use terminated. Terminated is the preferred term. Distribution Service Providers should be Distribution Provider to be consistent with the Functional Model</p>
<p>Response: The SDT thanks you for your comments. The SDT reviewed Requirement R2 and the associated attachment and, based on stakeholder comments and additional deliberations, determined that Requirement R2 is not a requirement that defines a “communication protocol” – rather the requirement was attempting to define various alert levels. The SDT removed the requirement from the second draft of the standard as outside the scope of this standard.</p>		
<p>Midwest ISO Standards Collaborators</p>	<p>Disagree</p>	<p>It is not clear what value is realized by declaring an alert status particularly with regard to cyber and physical attacks. There do not appear to be any differing actions taken based on the alert status. Given that no differing actions are taken for cyber and physical attacks, it seems it would be more beneficial to use specific information, for example 12 substations have been physically or cyber attacked. This is more meaningful than issuing a red alert that would only indicate more than one site has been attacked.</p> <p>Furthermore, we question the value of communicating the physical and cyber alerts. How does this notification help the BES reliability? Consider the following example. One BA in Oklahoma is 34,323 sq miles. Communicating that an attack occurred in the BA and RC tells other operators that somewhere in Oklahoma an attack occurred. This notification does not present any information that could require actions on the operators’ parts, and will only generate phone calls for more information.</p> <p>Furthermore, PSE and CSE is a type of sabotage already reported in CIP-001 R2. TEA Alerts are already covered in IRO-006-East-1, IRO-009, IRO-010, IRO-014.01 R2.</p> <p>Attachment 1 contains a conflict. The last sentence of the opening paragraph of Attachment 1 reads, “The time frame for declaration of these Alert states shall be consistent with the approach used to declare EEAs and would normally apply to Real Time declarations and not forecast conditions.” In Transmission Emergency Alerts Condition Yellow, Orange and RED: The Reliability Coordinator or Transmission Operator foresees or is experiencing conditions where all available generation resources are committed to respect the IROL and/or is concerned about its ability to respect the IROL. Foresees is a forecast condition.</p> <p>In condition Orange and Red for TEA Level Two/Three, the initial notification requirements are redundant with IRO-006-East-1 R3.2.</p> <p>Under the Make Final Notifications, is curtailed intended to mean canceled or terminated? The term Curtailed in operations generally means cuts for schedules/tags. EEA’s use terminated. Terminated is the preferred term.</p>

Organization	Yes or No	Question 9 Comment
		Distribution Service Providers should be Distribution Provider to be consistent with the Functional Model.
<p>Response: The SDT thanks you for your comments. The SDT reviewed Requirement R2 and the associated attachment and, based on stakeholder comments and additional deliberations, determined that Requirement R2 is not a requirement that defines a “communication protocol” – rather the requirement was attempting to define various alert levels. The SDT removed the requirement from the second draft of the standard as outside the scope of this standard.</p>		
Transmission System Operations	Agree	<p>It should be made clear that Attachment 1 applies to the RC’s. It is not specifically stated in R2 that it is the RC’s responsibility to make notifications. In Attachment 1, we believe the wording under “Initial Notifications” should be changed. For example, on the 2nd row and 1st column of the matrix, it states that the RC makes initial notification and states that “...there is a Physical Emergency Alert, PSEA Level One within...” Nowhere is it ever mentioned that there is a “Condition Yellow”. Since it is never mentioned by the RC in the notification that the Condition is “Yellow”, what is the use or benefit of having the conditions?</p> <p>It should also be made clear that when the RC states, for example, that “There is a Physical Security Emergency Alert-PSEA Level One within...” that this refers to specific definitions given in Attachment 1 of EOP-002-2.1. This fact is mentioned at the top of the matrix, but the wording of this explanation is not consistent with the wording used in the body of the matrix.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT reviewed Requirement R2 and the associated attachment and, based on stakeholder comments and additional deliberations, determined that Requirement R2 is not a requirement that defines a “communication protocol” – rather the requirement was attempting to define various alert levels. The SDT removed the requirement from the second draft of the standard as outside the scope of this standard.</p>		
NERC Staff	Agree	<p>NERC staff recommends that a line be added to each table that provides the expectation for entities communicating events to the Reliability Coordinator. Using the existing tables, all expectations and requirements rest solely on the Reliability Coordinator. We also recommend eliminating the color designations of yellow, orange, red and the Alerts be changed to Level One, Two and Three for consistency. The use of colors does not appear to add anything to the clarity or effectiveness in conveying the content of an Alert and may be inconsistent with the Department of Homeland Security’s threat level system. Additionally, the team should update Attachment 1 to include the criteria and notifications for Energy Emergency Alerts.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT reviewed Requirement R2 and the associated attachment and, based on stakeholder comments and additional deliberations, determined</p>		

Organization	Yes or No	Question 9 Comment
<p>that Requirement R2 is not a requirement that defines a “communication protocol” – rather the requirement was attempting to define various alert levels. The SDT removed the requirement from the second draft of the standard as outside the scope of this standard.</p>		
NIPSCO	Disagree	No comment
PPL		No comments either way since this applies specifically to RCs.
Northeast Utilities	Disagree	No concerns or suggestions (Disagree = No)
Westar Energy	Agree	no suggestions
NextEra Energy Resources, LLC	Disagree	None at this time.
Consumers Energy		None.
<p>Response: The SDT thanks you for your participation</p>		
PJM	Agree	<p>Our concern is that the Alert Level Guides of Attachment 1 were written for Reliability Coordinators, not the industry as a whole, and now they are being incorporated into an industry-wide standard.</p> <p>This attachment is very prescriptive as to how the notifications take place, such as through the RCIS. If the RCIS is not functioning and the hotline is used instead, is the entity vulnerable to a violation by virtue of the fact that these alert guides are included in the standard?</p> <p>We believe that the color-coded system condition terminology should be defined/required externally to the COM standards. The use of clear & consistent alert level terminology, while important, does not fit in well with the reliability-related communication standards, especially at these high violation severity levels.</p> <p>It is our suggestion that the Alert Level Guides be balloted separately, and include the Energy Emergency Alerts (EEA) as well. EEA requirements currently exist in NERC Standard EOP-002-2.</p> <p>It is not clear what value is realized by declaring an alert status particularly with regard to cyber and physical attacks. There do not appear to be any differing actions taken based on the alert status. Given that no differing actions are taken for cyber and physical attacks, it seems it would be more beneficial to use specific information, for example 12 substations have been physically or cyber attacked. This is more meaningful than issuing a red alert that would only indicate more than one site has been attacked.</p> <p>Furthermore, we question the value of communicating the physical and cyber alerts. How does this notification</p>

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		<p>help the BES reliability? Consider the following example. One BA in Oklahoma is 34,323 sq miles. Communicating that an attack occurred in the BA and RC tells other operators that somewhere in Oklahoma an attack occurred. This notification does not present any information that could require actions on the operators’ parts, and will only generate phone calls for more information.</p> <p>Furthermore, PSE and CSE is a type of sabotage already reported in CIP-001 R2. TEA Alerts are already covered in IRO-006-East-1, IRO-009, IRO-010, IRO-014.01 R2.</p> <p>Attachment 1 contains a conflict. The last sentence of the opening paragraph of Attachment 1 reads, “The time frame for declaration of these Alert states shall be consistent with the approach used to declare EEAs and would normally apply to Real Time declarations and not forecast conditions.” In Transmission Emergency Alerts Condition Yellow, Orange and RED: The Reliability Coordinator or Transmission Operator foresees or is experiencing conditions where all available generation resources are committed to respect the IROL and/or is concerned about its ability to respect the IROL. Foresees is a forecast condition.</p> <p>In condition Orange and Red for TEA Level Two/Three, the initial notification requirements are redundant with IRO-006-East-1 R3.2.</p> <p>Under the Make Final Notifications, is curtailed intended to mean canceled or terminated? The term Curtailed in operations generally means cuts for schedules/tags. EEA’s use terminated. Terminated is the preferred term.</p> <p>Distribution Service Providers should be Distribution Provider to be consistent with the Functional Model. Refer to the response to Question #4.</p>
<p>Response: The SDT thanks you for your comments. The SDT reviewed Requirement R2 and the associated attachment and, based on stakeholder comments and additional deliberations, determined that Requirement R2 is not a requirement that defines a “communication protocol” – rather the requirement was attempting to define various alert levels. The SDT removed the requirement from the second draft of the standard as outside the scope of this standard.</p>		
PJM SOS Comments	Agree	<p>Our concern is that the Alert Level Guides of Attachment 1 were written for Reliability Coordinators, not the industry as a whole, and now they are being incorporated into an industry-wide standard.</p> <p>This attachment is very prescriptive as to how the notifications take place, such as through the RCIS. If the RCIS is not functioning and the hotline is used instead, is the entity vulnerable to a violation by virtue of the fact that these alert guides are included in the standard?</p> <p>We believe that the color-coded system condition terminology should be defined/required externally to the COM standards. The use of clear & consistent alert level terminology, while important, does not fit in well with the</p>

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		<p>reliability-related communication standards, especially at these high violation severity levels.</p> <p>It is our suggestion that the Alert Level Guides be balloted separately, and include the Energy Emergency Alerts (EEA) as well. EEA requirements currently exist in NERC Standard EOP-002-2.</p> <p>It is not clear what value is realized by declaring an alert status particularly with regard to cyber and physical attacks. There do not appear to be any differing actions taken based on the alert status. Given that no differing actions are taken for cyber and physical attacks, it seems it would be more beneficial to use specific information, for example 12 substations have been physically or cyber attacked. This is more meaningful than issuing a red alert that would only indicate more than one site has been attacked.</p> <p>Furthermore, we question the value of communicating the physical and cyber alerts. How does this notification help the BES reliability? Consider the following example. One BA in Oklahoma is 34,323 sq miles. Communicating that an attack occurred in the BA and RC tells other operators that somewhere in Oklahoma an attack occurred. This notification does not present any information that could require actions on the operators’ parts, and will only generate phone calls for more information.</p> <p>Furthermore, PSE and CSE is a type of sabotage already reported in CIP-001 R2. TEA Alerts are already covered in IRO-006-East-1, IRO-009, IRO-010, IRO-014.01 R2.</p> <p>Attachment 1 contains a conflict. The last sentence of the opening paragraph of Attachment 1 reads, “The time frame for declaration of these Alert states shall be consistent with the approach used to declare EEAs and would normally apply to Real Time declarations and not forecast conditions.” In Transmission Emergency Alerts Condition Yellow, Orange and RED: The Reliability Coordinator or Transmission Operator foresees or is experiencing conditions where all available generation resources are committed to respect the IROL and/or is concerned about its ability to respect the IROL. Foresees is a forecast condition.</p> <p>In condition Orange and Red for TEA Level Two/Three, the initial notification requirements are redundant with IRO-006-East-1 R3.2.</p> <p>Under the Make Final Notifications, is curtailed intended to mean canceled or terminated? The term Curtailed in operations generally means cuts for schedules/tags. EEA’s use terminated. Terminated is the preferred term.</p> <p>Distribution Service Providers should be Distribution Provider to be consistent with the Functional Model. Refer to the response to Question #4.</p>

Response: The SDT thanks you for your comments. The SDT reviewed Requirement R2 and the associated attachment and, based on stakeholder comments and additional deliberations, determined that Requirement R2 is not a requirement that defines a “communication protocol” – rather the

Organization	Yes or No	Question 9 Comment
<p>requirement was attempting to define various alert levels. The SDT removed the requirement from the second draft of the standard as outside the scope of this standard.</p>		
<p>SERC OC&SOS Standards Review Group</p>	<p>Agree</p>	<p>Our concern is that the Alert Level Guides of Attachment 1 were written for Reliability Coordinators, not the industry as a whole, and now they are being incorporated into an industry-wide standard.</p> <p>This attachment is very prescriptive as to how the notifications take place, such as through the RCIS. If the RCIS is not functioning and the hotline is used instead, is the entity vulnerable to a violation by virtue of the fact that these alert guides are included in the standard?</p> <p>We believe that the color-coded system condition terminology should be defined/required externally to the COM standards.</p> <p>The use of clear & consistent alert level terminology, while important, does not fit in well with the reliability-related communication standards, especially at these high violation severity levels.</p> <p>It is our suggestion that the Alert Level Guides be balloted separately, and includes the Energy Emergency Alerts (EEA) as well. EEA requirements currently exist in NERC Standard EOP-002-2.1</p>
<p>Response: The SDT thanks you for your comments. The SDT reviewed Requirement R2 and the associated attachment and, based on stakeholder comments and additional deliberations, determined that Requirement R2 is not a requirement that defines a “communication protocol” – rather the requirement was attempting to define various alert levels. The SDT removed the requirement from the second draft of the standard as outside the scope of this standard.</p>		
<p>PEF</p>	<p>Agree</p>	<p>PEF recommends that the color coding and definitions that are used by Homeland Security also be used for the notification of physical and cyber emergency alerts reported to the RC. This would follow the ES-ISAC standard already adopted by the electric industry. If the attachment is adopted as is, PEF recommends adding the EEA levels to provide “pre-defined system condition terminology.”</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT reviewed Requirement R2 and the associated attachment and, based on stakeholder comments and additional deliberations, determined that Requirement R2 is not a requirement that defines a “communication protocol” – rather the requirement was attempting to define various alert levels. The SDT removed the requirement from the second draft of the standard as outside the scope of this standard.</p>		
<p>Xcel Energy</p>	<p>Agree</p>	<p>Please see our response to question 4.</p>
<p>National Grid</p>	<p>Disagree</p>	<p>Please see response to Question 4.</p>

Organization	Yes or No	Question 9 Comment
<p>Response: The SDT thanks you for your comments. See response to comments to Question 4.</p>		
<p>Progress Energy Carolina, Inc</p>	<p>Agree</p>	<p>R2 which links with Attachment 1 is applicable to a host of entities while the Attachment seems to only provide pre-defined system condition terminology for use during notifications by the RC to other entities. PEC feels that unscripted specific language used by RCs now on RCIS and in verbal communications currently provides the necessary awareness and information to entities without personnel having to refer to a procedure or remember color codes to decipher the meaning. This attachment does not serve to increase the reliability of the BES.</p>
<p>Response: The SDT thanks you for your comments. The SDT reviewed Requirement R2 and the associated attachment and, based on stakeholder comments and additional deliberations, determined that Requirement R2 is not a requirement that defines a “communication protocol” – rather the requirement was attempting to define various alert levels. The SDT removed the requirement from the second draft of the standard as outside the scope of this standard.</p>		
<p>Puget Sound Energy</p>	<p>Disagree</p>	<p>See discussion in Question 4. Also the attachment applies to Reliability Coordinators only, yet the requirement referencing the attachment applies to additional entities. Those entities should be removed from Requirement 2 or the attachment and Requirement 2 should be clarified to address what those additional entities’ responsibilities are under the attachment.</p>
<p>Response: The SDT thanks you for your comments. See response to comments to Question 4. The SDT reviewed Requirement R2 and the associated attachment and, based on stakeholder comments and additional deliberations, determined that Requirement R2 is not a requirement that defines a “communication protocol” – rather the requirement was attempting to define various alert levels. The SDT removed the requirement from the second draft of the standard as outside the scope of this standard.</p>		
<p>ATC and ITC</p>	<p>Disagree</p>	<p>See question #4.</p>
<p>South Carolina Electric and Gas</p>	<p>Agree</p>	<p>See question 4.</p>
<p>Response: The SDT thanks you for your comments. See response to comments to Question 4.</p>		
<p>Electric Market</p>	<p>Agree</p>	<p>See response to question 4. In addition, there seems to be an inconsistency between the inclusion of Attachment</p>

Organization	Yes or No	Question 9 Comment
Policy		<p>1 and what is stated in the document posted with the standard entitled Disposition of Requirements Identified in the SAR for Operations Communications Protocols as Possibly Needing either Modification or Movement. The document states that the standard focuses on “how to” communicate rather than on specified scenarios of “to whom” or “when to” communicate; however, Attachment 1 does just the opposite.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT reviewed Requirement R2 and the associated attachment and, based on stakeholder comments and additional deliberations, determined that Requirement R2 is not a requirement that defines a “communication protocol” – rather the requirement was attempting to define various alert levels. The SDT removed the requirement from the second draft of the standard as outside the scope of this standard.</p> <p>See response to comments to Question 4.</p>		
British Columbia Transmission Corporation	Agree	Should a move to a standard time be required then the move should be to Universal Time
<p>Response: The SDT thanks you for your comments.</p> <p>See response to comments to Question 5.</p>		
Southern Company Transmission	Agree	<p>Southern Company supports the SERC SOS comments.</p> <p>SERC SOS comments: Our concern is that the Alert Level Guides of Attachment 1 were written for Reliability Coordinators, not the industry as a whole, and now they are being incorporated into an industry-wide standard. This attachment is very prescriptive as to how the notifications take place, such as through the RCIS. If the RCIS is not functioning and the hotline is used instead, is the entity vulnerable to a violation by virtue of the fact that these alert guides are included in the standard?</p> <p>We believe that the color-coded system condition terminology should be defined/required externally to the COM standards.</p> <p>The use of clear & consistent alert level terminology, while important, does not fit in well with the reliability-related communication standards, especially at these high violation severity levels.</p> <p>It is our suggestion that the Alert Level Guides be balloted separately, and includes the Energy Emergency Alerts (EEA) as well. EEA requirements currently exist in NERC Standard EOP-002-2.1</p>
<p>Response: The SDT thanks you for your comments. Please see the response to the SERC SOS comments.</p>		

Organization	Yes or No	Question 9 Comment
Kansas City Power & Light	Disagree	The attachment is inappropriate for this standard and should be removed. See response to question #4.
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT reviewed Requirement R2 and the associated attachment and, based on stakeholder comments and additional deliberations, determined that Requirement R2 is not a requirement that defines a “communication protocol” – rather the requirement was attempting to define various alert levels. The SDT removed the requirement from the second draft of the standard as outside the scope of this standard.</p> <p>Please see response to comments to question #4.</p>		
ERCOT ISO	Agree	The intent is for a simple way to look and know the high-level status of an area. This goes way too far into HOW to do it instead of stating what must be done.
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT reviewed Requirement R2 and the associated attachment and, based on stakeholder comments and additional deliberations, determined that Requirement R2 is not a requirement that defines a “communication protocol” – rather the requirement was attempting to define various alert levels. The SDT removed the requirement from the second draft of the standard as outside the scope of this standard.</p>		
Tri-State Generation & Transmission Assoc.	Agree	<p>The Operating State Alert Levels can be confused with DHS security levels.</p> <p>DSPs should not be included because they are not subject to BES standards because they do not operate the BES that responsibility resides with the TOP. The title Distribution Service Providers should be changed to Distribution Provider to correlate with the NERC functional model.</p> <p>Under Additional Communication the posting of the alert level should be determined by each entities internal procedure and not included in this standard. This attachment is too invasive and restrictive.</p>
<p>Response: The SDT thanks you for your comments. The SDT reviewed Requirement R2 and the associated attachment and, based on stakeholder comments and additional deliberations, determined that Requirement R2 is not a requirement that defines a “communication protocol” – rather the requirement was attempting to define various alert levels. The SDT removed the requirement from the second draft of the standard as outside the scope of this standard.</p>		
NYSEG	Agree	There does not appear to be any compelling practical or reliability reason to adopt the Attachment.
<p>Response: The SDT thanks you for your comments. The SDT reviewed Requirement R2 and the associated attachment and, based on stakeholder comments and additional deliberations, determined that Requirement R2 is not a requirement that defines a “communication protocol” – rather the</p>		

Organization	Yes or No	Question 9 Comment
<p>requirement was attempting to define various alert levels. The SDT removed the requirement from the second draft of the standard as outside the scope of this standard.</p>		
Sunflower Electric Power Corp.		Use a Phonetic alphabet in common use in the USA
<p>Response: The SDT thanks you for your comments. See response to Question 7.</p>		
FirstEnergy	Disagree	<p>We do not support Att. 1 and feel that it should be removed. This attachment is too convoluted, creates confusion among system operators, and not necessary with regard to the goal of this standard. This standard mandates proper three-part communication in all reliability-related communication. Other standards should define and mandate rules associated with the specifics surrounding urgent action situations (i.e. CIP, TOP, EOP standards). Together these standards will arrive at proper communication between entities during alert level situations.</p>
<p>Response: The SDT thanks you for your comments. The SDT reviewed Requirement R2 and the associated attachment and, based on stakeholder comments and additional deliberations, determined that Requirement R2 is not a requirement that defines a “communication protocol” – rather the requirement was attempting to define various alert levels. The SDT removed the requirement from the second draft of the standard as outside the scope of this standard.</p>		
ExxonMobil Research and Engineering	Disagree	We have no concerns or suggestions for improvement.
<p>Response: The SDT thanks you for your comments.</p>		
Duke Energy	Agree	<p>We support the development of this attachment, but question whether it belongs in this standard, especially since it is under field trial. We think it belongs in the EOP standards.</p> <p>We note the Attachment 1 is only associated with notifications by the RC, so we question whether these are Interoperability Communications as that term is defined.</p> <p>Also, the introduction on Attachment is very confusing. Attachment 1 states that definitions for Transmission Loading, Physical and Cyber Security Alert states align with the Emergency Energy Alert (EEA) states as already described in Standard EOP-002-2.1. EOP-002-2.1 and associated EEA Levels provides guidance on Energy and Capacity Emergencies rather than Transmission or Physical/Cyber Alerts.</p>

Organization	Yes or No	Question 9 Comment
		<p>Energy Emergency is defined as a condition when a LSE has exhausted all other options and can no longer provide its customers’ expected energy requirements. This is a totally different classification of Emergency Alert. We suggest deleting the 2nd and 3rd sentences of the introduction to Attachment 1. In addition, Attachment 1 does not contain four system condition alerts, as the SDT has proposed.</p>
<p>Response: The SDT thanks you for your comments. The SDT reviewed Requirement R2 and the associated attachment and, based on stakeholder comments and additional deliberations, determined that Requirement R2 is not a requirement that defines a “communication protocol” – rather the requirement was attempting to define various alert levels. The SDT removed the requirement from the second draft of the standard as outside the scope of this standard.</p>		
PSEG Companies	Agree	<p>Yes. The PSEG Companies agree with the concerns and suggestions expressed in the comments filed by the PJM System Operations Subcommittee (SOS) Group.</p>
<p>Response: The SDT thanks you for your comments. Please see the response to PJM SOS Group.</p>		

10. Are you aware of any regional variances that would be required as a result of this standard? If yes, please identify the regional variance.

Summary Consideration:

Commenters stated that if the Central Standard Time zone were required as proposed in R4, there should be a regional variance to allow the WECC to select the time zone to use as a standard. The standard R4 (new Requirement R1, Part 1.1.2) and (new Part 1.1.3) of COM-003-1 is shown below:

1.1.2 Use the 24-hour clock format when referring to clock times.

1.1.3. When the communication is between entities in different time zones, include the time, time zone and indicate whether time is daylight saving time or standard time.

Commenters raised questions about requiring the use of “English” which may conflict with legal requirements of non-English speaking Regions covered by NERC’s standards. The draft standard has been modified to account for law and regulation that mandates another language other than English.

1.1.1. Use the English language when communicating between functional entities, unless another language is mandated by law or regulation.

There were comments expressing concern that “blast” or “all-call” communications used by many RCs conflict with FERC Standards of Conduct issues, especially with respect to Distribution Providers and Generator Operators. The standard no longer references communications that involve “blast” or “all-call” communications.

Organization	Yes or No	Question 10 Comment
American Municipal Power	Agree	
Bureau of Reclamation	Agree	
American Electric Power	Disagree	
ATC and ITC	Disagree	

Consideration of Comments on OPCP SDT — Project 2007-02

Organization	Yes or No	Question 10 Comment
Bonneville Power Administration	Disagree	
British Columbia Transmission Corporation	Disagree	
Duke Energy	Disagree	
Dynegy	Disagree	
E.ON U.S. LLC	Disagree	
Entergy Services	Disagree	
ERCOT ISO	Disagree	
Georgia Transmission Corp	Disagree	
Great River Energy	Disagree	
Independent Electricity System Operator	Disagree	
Kansas City Power & Light	Disagree	
Manitoba Hydro	Disagree	
Midwest ISO Standards Collaborators	Disagree	

Consideration of Comments on OPCP SDT — Project 2007-02

Organization	Yes or No	Question 10 Comment
NorthWestern Energy	Disagree	
NYSEG	Disagree	
Oncor Electric Delivery	Disagree	
PacifiCorp	Disagree	
PEF	Disagree	
PPL	Disagree	
Santee Cooper	Disagree	
South Carolina Electric and Gas	Disagree	
Southern Company Transmission	Disagree	
Sunflower Electric Power Corporation	Disagree	
Transmission Owner	Disagree	
Tri-State Generation & Transmission Assoc.	Disagree	
We Energies	Disagree	

Organization	Yes or No	Question 10 Comment
Western Area Power Administration	Disagree	
Xcel Energy	Disagree	
Northeast Utilities	Disagree	(Disagree = No)
Florida Municipal Power Agency (FMPA) and some members	Disagree	(FMPA assumes "disagree" means that we are not aware of any regional variances)
Response: The SDT thanks you for your comments.		
Pacific Northwest Small Utilities Comment Group	Agree	<p>(This is a yes or no questions)Yes, The RC in the WECC region has no communication with any entity other than the sixteen listed in http://www.bpa.gov/corporate/business/reliability/Docs/2007/PNSC_RE_Data_Letter_2_070723.pdf. Although the linked document is on PNSC letterhead, WECC as RC continues this policy. Communication paths involving the RC and any other entity in the west other than the sixteen should be exempt from all the requirements in this standard.</p> <p>If DPs and LSEs must be included in this standard, then there should be an agreement in force beforehand between them and their RC, BA and TOP that they may receive directives, or require the RC, BA and TOP to list those DPs and LSEs that would not receive directives.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The LSEs were eliminated as responsible entities from this standard but some DPs are applicable depending on the impact they have on the BES. We have discussed the use of the letter cited in your comments with our WECC SDT member and he advises us that this arrangement is obsolete as the WECC RC does NOT continue to follow that policy. The WECC RC communicates with all registered Balancing Authorities and Transmission Operators within the Western Interconnection on a regular basis. In accordance with NERC Standard IRO-001-1.1 R3, the RC shall have clear decision-making authority to act and to direct actions to be taken by the Transmission Operators, Balancing Authorities, Generator Operators, Transmission Service Providers, Load-Serving Entities, and Purchasing-Selling Entities within its Reliability Coordinator Area to</p>		

Organization	Yes or No	Question 10 Comment
<p>preserve the integrity and reliability of the Bulk Electric System. In accordance with NERC Standard IRO-001-1.1 R8, Transmission Operators, Balancing Authorities, Generator Operators, Transmission Service Providers, Load-Serving Entities, and Purchasing-Selling Entities shall comply with Reliability Coordinator directives unless such actions would violate safety, equipment, or regulatory or statutory requirements.</p> <p>While it is typical for WECC RC to communicate, advise and direct Balancing Authorities or Transmission Operators, it is important for other registered entities to recognize that the RC may contact them directly if the situation requires such. Based on this scenario the requirements in COM 003 would apply to those entities if BES conditions warrant it.</p>		
NERC Staff	Agree	<p>Although no questions were asked about Requirement R3, NERC staff is aware that some areas in North America require a language other than English for official communication. In addition, it may be hard to define what “internal communications” are. NERC staff recommends that the phrase “Interoperability Communications. Responsible Entities may use an alternate language for internal communications” be replaced with “Operating Communications between functional entities, unless prohibited by law.” In addition, regions that exist solely in one time zone may ask for a variance from the requirement to use CST for communication.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT appreciates the comments with regards to the possible legal issues associated with the requirement to use English for oral and written Operating Communications. The draft standard has been modified to exempt entities from use of the English language where another language is mandated by law or regulation.</p> <p>The definition for “Interoperability Communication” has been removed and a new definition has been proposed for the term “Operating Communications”.</p> <p>The second draft of COM-003 does not mandate the use of the Central Time Zone and should obviate the need for the identified variance. The second draft of COM-003 includes the following as a replacement for the requirement to use the Central Time Zone:</p> <p>1.1.3. When the communication is between entities in different time zones, include the time, local time zone and indicate whether time is daylight saving time or standard time.</p>		
California Independent System Operator	Agree	<p>CAISO Comments; The proposed requirement R7 will cause regions operating in any time zone other than Central to draft regional standards to avoid this non-reliability supporting requirement.</p>
<p>Response: The SDT thanks you for your comments:</p> <p>The SDT has developed an alternative for the common time zone. Instead of requiring the use of a single continent-wide time zone, the</p>		

Organization	Yes or No	Question 10 Comment
<p>standard now requires that during Operating Communication an applicable entity shall explicitly state the time and time zone and indicate whether time is daylight saving time or standard time when communicating with one or more entities in a different time zone.</p>		
Puget Sound Energy		I might suggest one for R4 by each region that is not in the Central Standard Time zone.
<p>Response: The SDT thanks you for your comments The SDT has developed an alternative for the common time zone. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communication an applicable entity shall explicitly state the time and time zone and indicate whether time is daylight saving time or standard time when communicating with one or more entities in a different time zone</p>		
MRO NERC Standards Review Subcommittee	Agree	If the Central Standard time zone is required as noted in R4, we believe there should be a regional variance to allow the WECC to select the time zone to use as a standard.
<p>Response: The SDT thanks you for your comments The SDT has developed an alternative for the common time zone. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communication an applicable entity shall explicitly state the time and time zone and indicate whether time is daylight saving time or standard time when communicating with one or more entities in a different time zone.</p>		
Hydro-Québec TransEnergie	Agree	In the Province of Quebec, the use of French is mandatory, according to law, for communication within the Province.R3 should include: Within the Québec Interconnection, the French language shall be used for verbal and written interoperability communication between entities (RC, BA, TO, TOP, GOP, TSP, LSE and DP). For their interoperability communication with entities outside of the Québec Interconnection, they shall use the English language.
<p>Response: The SDT thanks you for your comments. The SDT appreciates the comments with regards to the possible legal issues associated with the requirement to use English for oral and written Operating Communications. The draft standard has been modified to exempt entities from use of the English language where another language is mandated by law or regulation.</p>		
IRC Standards Review Committee	Agree	Many RC communications are issued to multiple parties using blast communication systems such as the RCIS. Several of the parties such as Distribution Provider and Generation Operator cannot have access to these systems due FERC standards of conduct requirements. Requirement 2 and the listing of functional entities

Organization	Yes or No	Question 10 Comment
		<p>required to be notified within the RC footprint in attachment 1 create a de facto requirement for them to have RCIS access or an unnecessary burden to communicate with all functional entities listed separately. Having to communicate to all functional entities in that list verbally and individually would create an unnecessary burden that distracts the RC from actual system operation and represents a detriment to reliability.</p>
<p>Response: The SDT thanks you for your comments. The SDT has deleted COM-003 - Attachment 1 and Requirement R2 from the second draft of COM-003 in response to stakeholder concerns.</p>		
<p>ISO New England Inc.</p>	<p>Agree</p>	<p>Many RC communications are issued to multiple parties using blast communication systems such as the RCIS. Several of the parties such as Distribution Provider and Generation Operator cannot have access to these systems due FERC standards of conduct requirements. Requirement 2 and the listing of functional entities required to be notified within the RC footprint in attachment 1 create a de facto requirement for them to have RCIS access or an unnecessary burden to communicate with all functional entities listed separately. Having to communicate to all functional entities in that list verbally and individually would create an unnecessary burden that distracts the RC from actual system operation and represents a detriment to reliability.</p>
<p>Response: The SDT thanks you for your comments. The SDT deleted Requirement R2 and the associated COM-003 - Attachment 1 from the second draft of the standard in response to stakeholder concerns.</p>		
<p>Northeast Power Coordinating Council</p>	<p>Agree</p>	<p>Many RC communications are issued to multiple parties using blast communication systems such as the RCIS. Several of the parties such as Distribution Provider and Generation Operator cannot have access to these systems due FERC standards of conduct requirements. Requirement 2 and the listing of functional entities required to be notified within the RC footprint in Attachment 1 creates a de facto requirement for them to have RCIS access or an unnecessary burden to communicate with all functional entities listed separately. Having to communicate to all functional entities in that list verbally and individually would create that unnecessary burden, and distract the RC from actual system operation. This is a detriment to reliability.</p> <p>Some ISO/RTOs have market rules which allow participants to elect NOT to follow instructions issued by their market operator (who may also perform BA, TOP and/or RC entity functions) unless an Emergency exists.</p> <p>In the Province of Québec, the use of French is mandatory, according to law, for communication within the Province. R3 should include: Within the Québec Interconnection, the French language shall be used for verbal and written interoperability communication between entities (RC, BA, TO, TOP, GOP, TSP, LSE and DP). For their</p>

Organization	Yes or No	Question 10 Comment
		interoperability communication with entities outside of the Québec Interconnection, they shall use the English language.
<p>Response: The SDT thanks you for your comments. The SDT deleted Requirement R2 and the associated COM-003 - Attachment 1 from the second draft of the standard in response to stakeholder concerns.</p> <p>The SDT appreciates the comments with regards to the possible legal issues associated with the requirement to use English for oral and written Operating Communications. The draft standard has been modified to exempt entities from use of the English language where another language is mandated by law or regulation.</p>		
PJM SOS Comments	Agree	Many RC communications are issued to multiple parties using blast communication systems such as the RCIS. Several of the parties such as Distribution Provider and Generation Operator cannot have access to these systems due FERC standards of conduct requirements. Requirement 2 and the listing of functional entities required to be notified within the RC footprint in attachment 1 create a de facto requirement for them to have RCIS access or an unnecessary burden to communicate with all functional entities listed separately. Having to communicate to all functional entities in that list verbally and individually would create an unnecessary burden that distracts the RC from actual system operation and represents a detriment to reliability.
<p>Response The SDT thanks you for your comments.</p> <p>The SDT deleted Requirement R2 and the associated COM-003 - Attachment 1 from the second draft of the standard in response to stakeholder concerns.</p>		
PJM	Disagree	Many RC communications are issued to multiple parties using blast communication systems such as the RCIS. Several of the parties such as Distribution Provider and Generation Operator cannot have access to these systems due FERC standards of conduct requirements. Requirement 2 and the listing of functional entities required to be notified within the RC footprint in attachment 1 create a de facto requirement for them to have RCIS access or an unnecessary burden to communicate with all functional entities listed separately. Having to communicate to all functional entities in that list verbally and individually would create an unnecessary burden that distracts the RC from actual system operation and represents a detriment to reliability.
<p>Response: The SDT thanks you for your comments. The SDT deleted Requirement R2 and the associated COM-003 - Attachment 1 from the second draft of the standard in response to stakeholder concerns.</p>		
The Empire District Electric	Agree	NO

Consideration of Comments on OPCP SDT — Project 2007-02

Organization	Yes or No	Question 10 Comment
Company		
PSEG Companies	Disagree	No regional variances would be required to the best of PSEG's knowledge.
SERC OC&SOS Standards Review Group	Disagree	No, we are not aware of any regional variances.
National Grid	Disagree	None
NIPSCO	Disagree	none
NextEra Energy Resources, LLC	Disagree	None at this time.
Consumers Energy		None.
Westar Energy	Agree	not aware
Orange and Rockland Utilities, Inc.	Disagree	Not aware
FirstEnergy		Not aware of any
Response: The SDT thanks you for your comments.		
Pepco Holdings, Inc. - Affiliates	Agree	PHI asserts that WECC would say NO to Central Standard Time.
Response: The SDT thanks you for your comments. The SDT has developed an alternative for the common time zone. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communication an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone.		
NRECA RTF	Agree	POSSIBLE FRCC VARIENCE - FRCC appears to have developed a communication protocol in which “any or all

Organization	Yes or No	Question 10 Comment
Members		conversations on the phone are considered a directive. If this case, we suggest that the drafting team review the FRCC approach and determine if a regional variance should be included in this standard or consider utilizing the FRCC approach for clearly defining the term “directive” for inclusion in the NERC Glossary.
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT cannot comprehend how every conversation could be a directive. The SDT would have to understand the rationale and logic of such a communication protocol before rendering a response.</p>		
Transmission System Operations	Agree	Refer to Question #5; we do not agree with using Central Standard Time.
<p>Response: The SDT thanks you for your comments. The SDT has developed an alternative for the common time zone. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communication an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone.</p>		
Electric Market Policy	Agree	Some ISO/RTOs have market rules which allow participants to elect NOT to follow instructions issued by their market operator (who may also perform BA, TOP and/or RC entity functions) unless an Emergency exists.
<p>Response The SDT thanks you for your comments. The SDT recognizes different regions may have various market rules, but feels that the NERC Reliability Standards clearly identify requirements to follow reliability directives and indicate acceptable reasons for not complying with a directive.</p>		
ExxonMobil Research and Engineering	Disagree	We are not aware of any regional variances that would be required as a result of this standard.
<p>Response: The SDT thanks you for your comments.</p>		

11. Are you aware of any conflicts between the proposed standard and any regulatory function, rule order, tariff, rate schedule, legislative requirement or agreement? If yes, please identify the conflict.

Summary Consideration:

Commenters again point out requiring use of “English” may conflict with legal requirements of non-English speaking footprints covered by NERC. The draft standard has been modified to exempt entities bound by law or regulation from applicability of R3 (new Requirement R1, Part 1.1.1).

1.1.1. Use the English language when communicating between functional entities, unless another language is mandated by law or regulation.

Comments regarding a common Central Standard Time zone reference warned of confusion and cost impacting commercial electric power capacity and energy markets. R3 (new Requirement R1, Part 1.1.2 and 1.1.3) of COM-003-1 has been modified to:

1.1.2. Use the 24-hour clock format when referring to clock times.

1.1.3. When the communication is between entities in different time zones, include the time, local time zone and indicate whether time is daylight saving time or standard time.

(Example: 1500 EST or Eastern Standard Time).

Commenters state that TSPs, DPs and LSEs may not own or operate any Facilities, and indicated that inclusion of these entities as proposed in COM-003 is an unnecessary burden. The SDT removed TSPs and LSEs from the applicability of COM-003 as they were not identified in the SAR. The specified role of the DP to shed load justifies the retention of the DP as an applicable Entity. The requirements of COM-003-1 are only applicable to Operating Communications. To the extent that entities do not operate, or do not take actions that change or maintain the state, status, output, or input of an Element or Facility of the Bulk Electric System, COM-003-1 would not apply.

Commenters raised concern that requirements of the proposed COM-003 Standard conflict with Energy Policy Act of 2005 by shifting real time operator’s focus from reliable operation of the BES to complying with communication protocol. The SDT respectfully disagrees, and believes that COM-003 will lead to a tightening of communications, which in turn will contribute to enhanced reliable operations of the BES.

Organization	Yes or No	Question 11 Comment
American	Agree	

Consideration of Comments on OPCP SDT — Project 2007-02

Organization	Yes or No	Question 11 Comment
Municipal Power		
American Electric Power	Disagree	
ATC and ITC	Disagree	
Bonneville Power Administration	Disagree	
British Columbia Transmission Corporation	Disagree	
California Independent System Operator	Disagree	
Duke Energy	Disagree	
Dynegy	Disagree	
Entergy Services	Disagree	
ERCOT ISO	Disagree	
Georgia Transmission Corp	Disagree	
Great River Energy	Disagree	
Independent Electricity System Operator	Disagree	
Kansas City Power & Light	Disagree	

Consideration of Comments on OPCP SDT — Project 2007-02

Organization	Yes or No	Question 11 Comment
Long Island Power Authority	Disagree	
Manitoba Hydro	Disagree	
Midwest ISO Standards Collaborators	Disagree	
New York State Reliability Council	Disagree	
NYSEG	Disagree	
Oncor Electric Delivery	Disagree	
Pepco Holdings, Inc. - Affiliates	Disagree	
PPL	Disagree	
South Carolina Electric and Gas	Disagree	
Sunflower Electric Power Corporation	Disagree	
The Empire District Electric Company	Disagree	
Transmission Owner	Disagree	
Transmission System Operations	Disagree	

Organization	Yes or No	Question 11 Comment
Tri-State Generation & Transmission Assoc.	Disagree	
Western Area Power Administration	Disagree	
Xcel Energy	Disagree	
Northeast Utilities	Disagree	(Disagree = No)
Florida Municipal Power Agency (FMPA) and some members	Disagree	(FMPA assumes that "Disagree" means that we are not aware of any conflicts)
Response: The SDT thanks you for your comments.		
Pacific Northwest Small Utilities Comment Group	Agree	(This is a Yes or No Questions)Yes, see our comments to Q2.
Response: The SDT thanks you for your comments. Please see SDT response to Q2 comments.		
Santee Cooper	Agree	A lot of the requirements in this standard could be considered a “best practice” for the industry rather than reliability related.
Response: The SDT thanks you for your comments. The SDT believes these requirements play an important role in managing the human factor to eliminate miscommunication that would result in adverse effects on the BES.		
NERC Staff	Agree	Although no questions were asked about Requirement R3, NERC staff is aware that some areas in North America require a language other than English for official communication. In addition, it may be hard to define what “internal communications” are. NERC staff recommends that the phrase “Interoperability Communications. Responsible Entities may use an alternate language for internal communications” be replaced

Organization	Yes or No	Question 11 Comment
		with “Operating Communications between functional entities, unless prohibited by law.”
<p>Response: The SDT thanks you for your comments. The draft standard has been modified to exempt entities from use of the English language where another language is mandated bylaw or regulation. The second draft of the standard clarifies that the requirement to use English only applies with the Operating Communication involves more than one functional entity.</p> <p>The definition for “Interoperability Communication” has been removed and a new definition has been proposed for the term “Operating Communications” in the current draft of the standard.</p>		
Bureau of Reclamation	Disagree	As indicated in the previous response the standard conflicted with DHS notifications.
<p>Response: The SDT thanks you for your comments. The SDT removed Requirement R2 and the associated attachment from the revised standard.</p>		
MRO NERC Standards Review Subcommittee	Agree	Attachment 1, Physical Security is a basis for the SAR for Project 2009-02, Disturbance and Sabotage reporting SDT.
<p>Response: The SDT thanks you for your comments and bringing that reference for PSEA to our attention. The SDT removed Requirement R2 and the associated attachment from the revised standard. The SDT has recommended that Project 2009-01 – Disturbance and Sabotage Reporting pick up the requirement to issue notifications to operating entities when the BES is in an alert or emergency state.</p>		
PacifiCorp	Disagree	Currently, PacifiCorp’s Open Oasis Access Same-Time Information System (OASIS) allows time to be shown displays time in Pacific Standard Time. Mandating all Interoperability Communications to be held in Central Standard Time may cause confusion with regard to transactions and activities conducted on OASIS - which ultimately relate to real-time operations.
<p>Response: The SDT thanks you for your comments. The SDT has developed an alternative for the common time zone. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communication an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone.</p>		
E.ON U.S. LLC	Disagree	If the requisite protocols are intended to be followed by all field personnel, applicability of these requirements to Distribution Providers could run afoul of FPA Section 215(a) codified in 18CFR39.1.
<p>Response: The SDT thanks you for your comments. The SDT requires more detail on how FPA Section 215(a) codified in 18CFR39.1 is affected by the protocols of COM- 003-01. The second draft of COM-003 provides greater clarity on when to use the various communication protocols.</p>		

Organization	Yes or No	Question 11 Comment
<p>Please review the second draft of the standard to see if you still have concerns about the applicability of these protocols.</p>		
We Energies	Agree	<p>In general, establishing CST as a uniform time zone may conflict with individual Tariffs regarding references to wholesale electric market commercial activities and could cause additional confusion if commercial market time zone references are independent of reliability time zone references.</p>
<p>Response: The SDT thanks you for your comments. The SDT has developed an alternative for the common time zone. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communication an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone.</p>		
Hydro-Québec TransEnergie	Agree	<p>In some market structures, TSPs and LSE do not own or operate equipment. Thus, including them in the requirements is an unnecessary burden for these areas. The requirement to use CST attempts to determine HOW entities operate within their various footprints and it would significantly change the way many Markets are structured. To implement this into existing Markets would cost significant time, and resources while not enhancing reliability in these areas. When operating across time-zones, simply referencing “Central Standard Time” or “Eastern Standard Time” is sufficient for other operating entities to reliably operate. Many entities would have to modify their existing practices, hardware, software, Control System, billing systems, bidding systems, etc. We are strongly opposed to this requirement.</p>
<p>Response: The SDT thanks you for your comments. The SDT appreciates the comments with regards to concerns related to including TSPs and LSEs that do not own or operate facilities that are a part of the BES. The SDT has removed the TSPs and LSEs because they were not bound by this requirement in the originating SAR. The SDT has modified Requirement R4 (Now Requirement R1, Part 1.1.3 of the second draft) and believes it has addressed the concerns identified in your comments about time zones. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communication an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone.</p>		
IRC Standards Review Committee	Agree	<p>In some market structures, TSPs and LSE do not own or operate equipment. Thus, including them in the requirements is an unnecessary burden for these areas. The requirement to use CST attempts to determine HOW entities operate within their various footprints and it would significantly change the way many Markets are structured. To implement this into existing Markets would cost significant time, money and resources while not enhancing reliability in these areas. We believe that, when operating across time-zones, simply referencing</p>

Organization	Yes or No	Question 11 Comment
		<p>“Central Standard Time” or “Eastern Standard Time” is sufficient for other operating entities to reliably operate; also, let’s not lose sight of HOW MANY entities would have to modify their existing practices, hardware, software, Control System, billing systems, bidding systems, etc. We are strongly opposed to this requirement.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT appreciates the comments with regards to concerns related to including TSPs and LSEs that do not own or operate Facilities that are a part of the BES. The SDT has removed the TSPs and LSEs because they were not bound by this requirement in the originating SAR.</p> <p>The SDT has modified Requirement R4 (Now Requirement R1, Part 1.1.3 of the second draft). Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communication an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone.</p>		
<p>ISO New England Inc.</p>	<p>Agree</p>	<p>In some market structures, TSPs and LSE do not own or operate equipment. Thus, including them in the requirements is an unnecessary burden for these areas.</p> <p>The requirement to use CST attempts to determine HOW entities operate within their various footprints and it would significantly change the way many Markets are structured. To implement this into existing Markets would cost significant time, money and resources while not enhancing reliability in these areas. We believe that, when operating across time-zones, simply referencing “Central Standard Time” or “Eastern Standard Time” is sufficient for other operating entities to reliably operate; also, let’s not lose sight of HOW MANY entities would have to modify their existing practices, hardware, software, Control System, billing systems, bidding systems, etc. We are strongly opposed to this requirement.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT appreciates the comments with regards to concerns related to including TSPs and LSEs that do not own or operate facilities that are a part of the BES. The SDT has removed the TSPs and LSEs because they were not bound by this requirement in the originating SAR.</p> <p>The SDT has modified Requirement R4 (Now Requirement R1, Part 1.1.3 of the current draft). Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communication an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone.</p>		
<p>Northeast Power Coordinating Council</p>	<p>Agree</p>	<p>In some market structures, TSPs and LSE do not own or operate equipment. Thus, including them in the requirements is an unnecessary burden for these areas.</p> <p>The requirement to use CST attempts to determine HOW entities operate within their various footprints and it would significantly change the way many Markets are structured. To implement this into existing Markets</p>

Organization	Yes or No	Question 11 Comment
		would cost significant time, and resources while not enhancing reliability in these areas. When operating across time-zones, simply referencing “Central Standard Time” or “Eastern Standard Time” is sufficient for other operating entities to reliably operate. Many entities would have to modify their existing practices, hardware, software, Control System, billing systems, bidding systems, etc. We are strongly opposed to this requirement.
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT appreciates the comments with regards to concerns related to including TSPs and LSEs that do not own or operate facilities that are a part of the BES. The SDT has removed the TSPs and LSEs because they were not bound by this requirement in the originating SAR.</p> <p>The SDT has modified Requirement R4 (Now Requirement R1, Part 1.1.3 of the current draft). Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communication an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time when communicating with one or more entities in a different time zone.</p>		
Progress Energy Carolina, Inc		no
National Grid	Disagree	None
NIPSCO	Disagree	none
NextEra Energy Resources, LLC	Disagree	None at this time.
Consumers Energy		None.
Westar Energy	Agree	not aware
Orange and Rockland Utilities, Inc.	Disagree	Not aware
FirstEnergy		Not aware of any
<p>Response: The SDT thanks you for your participation.</p>		
PEF	Agree	PEF recommends that the color coding and definitions that are used by Homeland Security also be used for the notification of physical and cyber emergency alerts reported to the RC. This would follow the ES-ISAC standard

Organization	Yes or No	Question 11 Comment
		already adopted by the electric industry.
Response: The SDT thanks you for your comments. The SDT removed Requirement R2 and the associated attachment from the revised standard.		
Electric Market Policy	Agree	PJM members are only required to comply during an Emergency.
Response: The SDT thanks you for your comments. Please provide the specific Requirements and terms of those requirements that PJM members “are only required to comply during an Emergency.”		
Southern Company Transmission	Agree	Southern Company supports the SERC SOS comments. SERC SOS comments: We do see a potential conflict with the Energy Policy Act 2005, which set the framework for the Electric Reliability Organization (ERO). The ERO’s mission is to oversee and protect the reliability of the Bulk Electric System. This standard seems to cross the line between reliability-related activities and other types of operating actions. The concern here is that system operators will focus on the letter of the standard rather than on good operating practice. The fear of a violation among operators may have a greater impact on reliability than the violation itself.
Response: The SDT thanks you for your comments. The SDT appreciates the comments with regard to concerns that COM-003 conflicts with the Energy Policy Act of 2005. The SDT respectfully disagrees, and believes that COM-003 will lead to a tightening of communications, which in turn will contribute to reliable operations of the BES. The Blackout Report Recommendation #26 states, communication protocols should be tightened especially those for alerts and emergency communications. FERC Order 693 P531 directed that communication protocols be tightened and suggested a new COM Reliability Standard as an acceptable approach. The SAR for this SDT charged the team to “tighten communication protocols, especially for communications during alerts and emergencies.” Additionally the SAR required “the use of specific communication protocols, enabling information to be efficiently conveyed and mutually understood for all operating conditions.” As one element of complying with this charge, the SDT has captured the industry wide practice of three part communications as an integral element of this standard. This requirement is currently in COM-002-2 R2.		
ExxonMobil Research and Engineering	Disagree	We are not aware of any conflicts.
Response: The SDT thanks you for your participation.		
PJM	Agree	We do see a potential conflict with the Energy Policy Act 2005, which set the framework for the Electric Reliability Organization (ERO). The ERO’s mission is to oversee and protect the reliability of the Bulk Electric

Organization	Yes or No	Question 11 Comment
		<p>System. This standard seems to cross the line between reliability-related activities and other types of operating actions which may be better suited for NAESB action. The concern here is that system operators will focus on the letter of the standard rather than on good operating practice. The fear of a violation among operators may have a greater impact on reliability than the violation itself. In some market structures, TSPs and LSE do not own or operate equipment. Thus, including them in the requirements is an unnecessary burden for these areas.</p> <p>The requirement to use CST attempts to determine HOW entities operate within their various footprints and it would significantly change the way many Markets are structured. To implement this into existing Markets would cost significant time, money and resources while not enhancing reliability in these areas. We believe that, when operating across time-zones, simply referencing “Central Standard Time” or “Eastern Standard Time” is sufficient for other operating entities to reliably operate; also, let’s not lose sight of HOW MANY entities would have to modify their existing practices, hardware, software, Control System, billing systems, bidding systems, etc. We are strongly opposed to this requirement.</p>
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PJM SOS Comments	Agree	We do see a potential conflict with the Energy Policy Act 2005, which set the framework for the Electric Reliability Organization (ERO). The ERO’s mission is to oversee and protect the reliability of the Bulk Electric

Organization	Yes or No	Question 11 Comment
		<p>System. This standard seems to cross the line between reliability-related activities and other types of operating actions which may be better suited for NAESB action.</p> <p>The concern here is that system operators will focus on the letter of the standard rather than on good operating practice. The fear of a violation among operators may have a greater impact on reliability than the violation itself.</p> <p>In some market structures, TSPs and LSE do not own or operate equipment. Thus, including them in the requirements is an unnecessary burden for these areas.</p> <p>The requirement to use CST attempts to determine HOW entities operate within their various footprints and it would significantly change the way many Markets are structured. To implement this into existing Markets would cost significant time, money and resources while not enhancing reliability in these areas. We believe that, when operating across time-zones, simply referencing “Central Standard Time” or “Eastern Standard Time” is sufficient for other operating entities to reliably operate; also, let’s not lose sight of HOW MANY entities would have to modify their existing practices, hardware, software, Control System, billing systems, bidding systems, etc. We are strongly opposed to this requirement.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT appreciates the comments with regard to concerns that COM-003 conflicts with the Energy Policy Act of 2005. The SDT respectfully disagrees, and believes that COM-003 will lead to a tightening of communications, which in turn will contribute to reliable operations of the BES. The Blackout Report Recommendation #26 states, communication protocols should be tightened especially those for alerts and emergency communications. FERC Order 693 P531 directed that communication protocols be tightened and suggested a new COM Reliability Standard as an acceptable approach. The SAR for this SDT charged the team to “tighten communication protocols, especially for communications during alerts and emergencies.” Additionally the SAR required “the use of specific communication protocols, enabling information to be efficiently conveyed and mutually understood for all operating conditions.” As one element of complying with this charge, the SDT has captured the industry wide practice of using three part communications as an integral element of this standard. This requirement is currently in COM-002-2 R2. The SDT appreciates the comments with regards to concerns related to including TSPs and LSEs that do not own or operate facilities that are a part of the BES, The SDT has removed the TSPs and LSEs because they were not bound by this requirement in the originating SAR.</p> <p>The SDT has modified Requirement R4 (Now Requirement R1, Part 1.1.3 of the current draft). Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communication an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone.</p>		
SERC OC&SOS	Agree	We do see a potential conflict with the Energy Policy Act of 2005, which set the framework for the Electric

Organization	Yes or No	Question 11 Comment
Standards Review Group		<p>Reliability Organization (ERO). The ERO’s mission is to oversee and protect the reliability of the Bulk Electric System. This standard seems to cross the line between reliability-related activities and other types of operating actions.</p> <p>The concern here is that system operators will focus on the letter of the standard rather than on good operating practice. The fear of a violation among operators may have a greater impact on reliability than the violation itself.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT appreciates the comments with regard to concerns that COM-003 conflicts with the Energy Policy Act of 2005. The SDT respectfully disagrees, and believes that COM-003 will lead to a tightening of communications, which in turn will contribute to reliable operations of the BES. The Blackout Report Recommendation #26 states, communication protocols should be tightened especially those for alerts and emergency communications. FERC Order 693 P531 directed that communication protocols be tightened and suggested a new COM Reliability Standard as an acceptable approach. The SAR for this SDT charged the team to “tighten communication protocols, especially for communications during alerts and emergencies.” Additionally the SAR required “the use of specific communication protocols, enabling information to be efficiently conveyed and mutually understood for all operating conditions.” As one element of complying with this charge, the SDT has captured the industry wide practice of using three part communications as an integral element of this standard. This requirement is currently in COM-002-2 R2.</p>		
PSEG Companies	Agree	<p>Yes. The PSEG Companies agree with the concerns expressed in the comments filed by the PJM System Operations Subcommittee (SOS) Group.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT appreciates the comments with regard to concerns that COM-003 conflicts with the Energy Policy Act of 2005. The SDT respectfully disagrees, and believes that COM-003 will lead to a tightening of communications, which in turn will contribute to reliable operations of the BES. The Blackout Report Recommendation #26 states, communication protocols should be tightened especially those for alerts and emergency communications. FERC Order 693 P531 directed that communication protocols be tightened and suggested a new COM Reliability Standard as an acceptable approach. The SAR for this SDT charged the team to “tighten communication protocols, especially for communications during alerts and emergencies.” Additionally the SAR required “the use of specific communication protocols, enabling information to be efficiently conveyed and mutually understood for all operating conditions.” As one element of complying with this charge, the SDT has captured the industry wide practice of using three part communications as an integral element of this standard. This requirement is currently in COM-002-2 R2.</p>		

Organization	Yes or No	Question 11 Comment
		<p>The SDT appreciates the comments with regards to concerns related to including TSPs and LSEs that do not own or operate facilities that are a part of the BES, The SDT has removed the TSPs and LSEs because they were not bound by this requirement in the originating SAR.</p> <p>The SDT has modified Requirement R4 (Now Requirement R1, Part 1.1.3 of the current draft). Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communication an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when communicating with one or more entities in a different time zone.</p>

12. Do you have any other comments to improve the draft standard? If yes, please elaborate in the comment area.

Summary Consideration:

Many commenters stated high VRFs and severe VSLs are too harsh for the requirements of this standard. The potential penalties associated with violating these requirements could be very significant for violating a communication protocol even if no adverse impact occurs on the BES. The SDT has modified the VRFs and VSLs to comply with approved NERC and FERC guidelines. The SDT believes the new assignments more accurately classify the VRFs and VSLs assigned to the Requirements in COM-003-1. In the second draft of the standard all VRFs are Medium.

Some commenters suggested modifications to COM-002-3 should be switched from Project 2006-06 and absorbed into COM-003-1 to simplify coordination of the changes on each of these standards. The Operating Personnel Communications Protocol SDT has been directed by the NERC Standards Committee to coordinate with the RC SDT and continue development of both standards simultaneously. Note however, that the OPCP SDT proposes retirement of COM-002 when COM-003 becomes effective.

Commenters pointed out the effective date listed in the proposed standard did not agree with the effective date shown in the COM-003-1 Implementation Plan. After comparing the effective dates listed in the COM-003-1 Implementation Plan and the proposed standard, the SDT has modified the Implementation Plan to match the proposed standard's effective date, providing entities at least six months after approvals before the standard becomes effective.

One commenter indicated that the Data Retention period should be expressed in days instead of months because of the inconsistency in the number of days per month. The SDT agrees that that the data retention periods should be expressed in a term other than months.

Commenters questioned if the standard should apply to Transmission Owners, Generator Owners, Distribution Providers, Interchange Authorities (Interchange Coordinators), Load-Serving Entities, and Purchasing-Selling Entities. The second draft of the

The Quality Review team recommended that the OPCP SDT modify Requirements R2 and R3 to clarify that these requirements for performance of three-part communication exclude Reliability Directives. This eliminates the double jeopardy issue that may have existed if both COM-002 and COM-003 were approved.

Thus – the revised COM-003 does include the term, Reliability Directive. In addition, the implementation plan was revised to no longer recommend retirement of COM-002. As modified, the two standards can exist without conflict. COM-002 requires the issuer of an Operating Communication to identify that communication as a “Reliability Directive” which gives recipients notice that the directive is associated with an “Emergency”. COM-003 now specifically identifies that the requirements for three part communication do not include “Reliability Directives.”

Per Standards Committee guidance, the SDT did not revise all the responses in this report that indicate COM-003 does not include the term, “Reliability Directive” nor did the team revise all the responses that indicated the team recommended retirement of COM-002.

standard has eliminated the Transmission Owner, Load-Serving Entity, and Purchasing-Selling Entity from the list of applicable entities. The SDT did not remove the Distribution Provider and did not add the Generator Owner or the Interchange Authority (Interchange Coordinator). The intent of the proposed standard is to apply only to those entities that send or receive Operating Communications and operate Facilities on the BES as a result of those communications, thus eliminating both the Transmission Owner and Transmission Service Provider from the standard. Because the Distribution Provider does participate in real-time communications for actions such as load shedding, the Distribution Provider was not removed from the second draft of the standard.

A commenter stated that the requirement in the Data Retention section for an entity found to be non-compliant to retain data until found compliant does not belong in a standard, because it is already mandated in the NERC Compliance Violation Investigation process. The SDT developed this language to be consistent with the NERC Standard Drafting Team Guidelines.

A commenter recommends the word “timely” should be removed from the Purpose statement since none of the requirements specify a time period. Since none of the Requirements specify a time limit for executing the required communications, the SDT removed “timely” from the second draft of COM-003.

Organization	Yes or No	Question 12 Comment
American Municipal Power	Agree	
Bureau of Reclamation	Agree	
ERCOT ISO	Agree	
ATC and ITC	Disagree	
British Columbia Transmission Corporation	Disagree	
Entergy Services	Disagree	
Georgia Transmission Corp	Disagree	

Organization	Yes or No	Question 12 Comment
Kansas City Power & Light	Disagree	
Manitoba Hydro	Disagree	
NYSEG	Disagree	
Oncor Electric Delivery	Disagree	
PacifiCorp	Disagree	
Pepco Holdings, Inc. - Affiliates	Disagree	
Sunflower Electric Power Corporation	Disagree	
Western Area Power Administration	Disagree	
Florida Municipal Power Agency (FMPA) and some members	Agree	<p>(FMPA assumes that "Agree" means "Yes, we do have other comments")</p> <p>The Violation Risk Factor for R2 should be “Low”, not “High”. It is administrative in nature.</p> <p>The SDT removed Requirement R2 from the revised standard.</p> <p>The Measures make the types of evidence an “or” statement, e.g., “(e)vidence may include ... voice recording, transcripts, operating logs, OR on site observations” (emphasis added). The Data Retention section seems to make evidence an “and” statement, e.g., “Each ... (Responsible Entity) shall retain ... dated operator logs for the most recent 12 months AND voice recordings or transcripts ... for ... 3 months” (emphasis added). These statements are inconsistent with each other and both ought to be “or” statements.</p> <p>The SDT appreciates the comment in regard to the difference between the Data Retention requirement and the documentation listed in Measure 2 (new standard format). The Data Retention section “format” for standards has been modified to eliminate the specificity in the section. As a result the AND language has been eliminated</p>

Organization	Yes or No	Question 12 Comment
		<p>and the conflict is eliminated.</p> <p>After consideration, the SDT has decided to modify the language of Due to the variability of the length of a month, data retention ought to be expressed in days rather than months, e.g., 90 days instead of 3 months.</p> <p>The SDT agrees that that the data retention periods should be expressed in a term other than months. The SDT revised the standard so that the data retention now says, “the most recent 365 days.”</p> <p>Why is the Transmission Owner included in the applicability of the standard? What “Interoperability Communications” are they involved with? If the Transmission Owner is included, why isn’t the Generation Owner? Explain the inconsistent treatment of Transmission Owners and Generator Owners.R3</p> <p>With regard to COM-003-1 the second draft of the standard does not apply to Transmission Owners or Generator Owners as (according to the Functional Model) they don’t engage in real-time Operating Communications. The intent of the proposed standard is to apply only to those entities that send or receive Operating Communications and operate facilities on the BES as a result of those communications.</p> <p>- what if an entity starts to communicate in a language other than English, but, as part of the 3 part communication process changes to English and completes all steps of 3-part communication in English, is that entity non-compliant or compliant?</p> <p>The SDT would like to point out that R3 is now requirement R1 Part 1.1.1 in the revised standard and uses the term “Operating Communications”. As envisioned, the oral or written Operating Communication would be in English no matter what language previous conversations took place in unless another language is mandated law or regulation.</p> <p>How should EOP-001-0, R4.1 coordinate with COM-003-1? Should EOP-001-0, R4.1 focus on internal Entity communications?</p> <p>R4.1 of EOP-001 as a whole requires “plans” for mitigating emergencies. These communication protocols differ from COM-003 protocols in that R4.1 (now R3.1 in EOP-001-2b) involves actions and tasks for mitigating operational emergencies and for coordinating activities; not how to communicate.</p>

Organization	Yes or No	Question 12 Comment
<p>Response: The SDT thanks you for your comments. Please see our responses above.</p>		
<p>Pacific Northwest Small Utilities Comment Group</p>	<p>Agree</p>	<p>(This is a Yes or No Questions)The proposed standard seems to have just thrown everyone into the pot, and not considered how registered entities interact with the BES or what other standard requirements apply to them. We cannot lose sight of the original objective of, not only ERO Compliance, but the “purpose” described in regards to the development of this standard (Posted as background information on Project 2007-02). The stated purpose is, “To ensure that reliability-related information is conveyed effectively, accurately, consistently, and timely to ensure mutual understanding by all key parties, especially during alerts and emergencies.”With this said, The BA’s, TOP’s and RC’s are the key registered entities that have the power to take action, they are the key players in the communication of information which “impacts” the BES. We fail to see the value added by including DP’s and LSE in most of the requirements of this standard. If anything, we see the opposite affect taking place by adding DP & LSE’s. This may be an extra tier of unnecessary communication that would not only slow down this process, but just may contribute to greater inefficiencies. Please note that many DP & LSE in the WECC region are very small utilities that do not have 24 by 7 coverage.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT has modified R4 and R5 (now requirement R1 Parts 1.3.1, 1.3.2 and 1.3.3 in the second draft of COM-003) to address your concerns. The revisions made narrow the list of responsible entities to just those that actually are involved in “Operating Communication” – defined as communication of instruction to change or maintain the state, status, output, or input of an Element or Facility of the Bulk Electric System.</p> <p>The SDT appreciates the comments with regards to concerns related to including DPs and LSEs. The SDT has removed the LSEs because they were not bound by this requirement in the originating SAR. The specified role of the DP to shed load justifies the retention of the DP as an applicable Entity.</p> <p>COM-003-1 does not address the required real time response or the required coverage for small utilities. To the extent they operate BES assets they must comply with applicable standards.</p>		
<p>Xcel Energy</p>	<p>Agree</p>	<p>1) Recommend removal of the references to measures in the data retention section of the standard. It is only necessary to refer to the requirements, which is already included.</p> <p>2) The data retention section should also be modified to refer generically to evidence, instead of "dated operator logs... and voice recordings or transcripts of voice recordings...". This is because the measures specifically allow for other types of evidence, as stated: "Evidence of use may include but is not limited to voice recordings, transcripts, operating logs, or on site observations."</p>

Organization	Yes or No	Question 12 Comment
<p>Response: The SDT thanks you for your comments.</p> <p>1 The SDT appreciates the comment in regard to the Data Retention section referring to Requirements instead of Measures. The drafting team has reviewed the Drafting Team Guideline document and notes that on page 41, both Requirements and Measures appear in Data Retention.</p> <p>2 The SDT agrees with the comment regarding the use of “evidence” in the Data Retention section and has modified the Data Retention section to eliminate the specific references to types of evidence in support of your suggestion.</p>		
Consumers Energy	Agree	Amplification of the communication process is needed but this draft reaches beyond Communication to the start of drafting procedures for three separate emergency conditions while it leaves one alone. Focusing on the communication process is in order.
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT removed Requirement R2 and the associated Attachment from the second draft of COM-003 based on stakeholder comments and concerns that the required performance went beyond requiring use of specific communications protocols.</p>		
Duke Energy	Agree	<p>As a general comment, all the requirements other than R1 are High VRFS with only Severe VSLs. As this standard is written to apply broadly to routine as well as emergency communications between entities, we believe that failure to meet these requirements would rarely impact the reliability of the Bulk Electric System. For example if in routine switching an operator says “Baker” instead of “Bravo”, the entity is subject to FERC’s most severe penalty.</p> <p>Clearly the basis for this standard needs to be reassessed. If we use the test that if a requirement or a standard supports/encourages reliability and security, then entities should invest the time and effort to track performance to ensure auditable compliance. For example - Does DCS compliance support/encourage reliability/security? The industry would generally say yes - so the tracking and determination of auditable compliance is justified. But would auditable compliance to this draft of COM-003-1 support/encourage reliability/security? We don’t think so, given the vague and general nature of this draft. It certainly would not justify the amount of work and effort it would take to ensure auditable compliance with this COM-003-1 draft, given the amount of effort it would take to monitor all recorded communications that fit within this vague draft standard. Bottom line is that we think COM-003 is not needed. As proposed, it is a “how” and not a “what” based standard that will create more distraction from reliability/security than any value it might add.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT has modified the VRFs and VSLs to comply with approved NERC and FERC guidelines. The VRFs in the second draft are all Medium.</p>		

Organization	Yes or No	Question 12 Comment
<p>Additionally, the SDT modified the requirement to approve accurate “accurate alpha-numeric clarifiers” to address the example you provided. (See Requirement R1, Part 1.2 in the second draft of COM-003.)</p> <p>The Blackout Report Recommendation #26 states, communication protocols should be tightened especially those for alerts and emergency communications. FERC Order 693 P531 directed that communication protocols be tightened and suggested a new COM Reliability Standard as an acceptable approach. The SAR for this SDT charged the team to “tighten communication protocols, especially for communications during alerts and emergencies.” Additionally the SAR required “the use of specific communication protocols, enabling information to be efficiently conveyed and mutually understood for all operating conditions.”</p> <p>The OPCP SDT was chartered to develop Communication Protocols for Operating Personnel. The SDT proposes that the second draft of the standard is more focused on “what” protocols to use in specific situations. In short COM 003 is needed and required.</p>		
<p>New York State Reliability Council</p>	<p>Agree</p>	<p>Comments: R1 requires each entity to create a CPOP. There is not a requirement to coordinate CPOP’s amongst entities beyond the requirements in the Standard. There is no requirement to exchange CPOP’s between entities with an operating relationship. The SDT should consider adding a requirement either that allows entities with operating relationships to request and be provided a copy of the other’s CPOP, or a requirement requiring the exchange of CPOP between entities with operating relationships.</p> <p>Additionally, we cannot understand how all requirements but R1 have been determined to have a HIGH VRF when, many of them are dictating HOW communications should take place and not when and why or what. High Risk Factor requirement (a) is one that, if violated, could directly cause or contribute to bulk power system instability, separation, or a cascading sequence of failures, or could place the bulk power system at an unacceptable risk of instability, separation, or cascading failures. NYSRC does not believe that any requirement in this Standard if violated would have the results specified in the definition of a High VRF, especially since these requirements are addressing the HOW of communication.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>Many of the comments we received pointed out that having a CPOP is an administrative activity. The SDT deleted the requirement for a CPOP in the second draft of COM-003-1.</p> <p>The SDT has modified the VRFs and VSLs to comply with approved NERC and FERC guidelines. In the second draft of the standard all VRFs are Medium. The SDT believes the new assignments more accurately classify the VRFs and VSLs assigned to the Requirements in COM-003-1.</p>		
<p>ExxonMobil</p>	<p>Agree</p>	<p>Compliance paragraph 1.4 bullet 2 implies that all entities retain 3 months worth of telephone voice recordings</p>

Organization	Yes or No	Question 12 Comment
Research and Engineering		<p>through its use of the word ‘and’ in the statement “Distribution Provider shall retain for Requirement 2 through 7, Measure 2 through 7, dated operator logs for the most recent 12 months and voice recordings or transcripts of voice recordings for the most recent 3 months”. While many utility companies employ the use of voice recorders, many industrial facilities do not. When a facility does not currently employ the use of voice recorders, is it the intent of this document to require the facility to install the infrastructure necessary to record and store telephone conversations? If so, what is the time line for deploying the infrastructure necessary to record and store telephone conversations?</p> <p>Currently, we maintain a log of our communications which includes the question or instruction and our (or in the case of a question the third party’s) response. Does this satisfy the evidence criteria as defined in measures M2 through M7 of the proposed standard?</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT appreciates the comment in regard to the difference between the Data Retention requirement and the documentation listed in Measures 2 through 7. After consideration, the SDT has decided to modify the language of the Data Retention section to eliminate specific references to types of evidence.</p> <p>Recorded voice conversations are one of several measurement options. The entity is permitted to use any measurement method to demonstrate compliance. Written transcripts with appropriate and accurate information or on site observations are acceptable forms of evidence.</p>		
FirstEnergy	Agree	<p>Coordination of SDT Efforts - We feel that the NERC Standards Committee should direct the Reliability Coordination SDT to hand over COM-002 to this OPCPSDT since those requirements will eventually be moved to COM-003-1. It is difficult to coordinate all these changes on a separate basis and moving the development to one SDT would help better coordinate these efforts. The current path forward is inefficient and causes confusion, not only for industry but also for the two drafting teams.</p> <p>Purpose Statement - We feel the phrase "especially during alerts and emergencies" implies that using proper communications protocol during normal operating situations is not as important as during emergencies. It is not appropriate to include this phrase in the purpose statement of a standard, and we suggest it be removed. Also, we suggest removing the word "timely" since this standard does not mandate time limits on communications.</p> <p>Compliance Section 1.4 Data Retention - We do not agree with the following statement for data retention "If a Transmission Operator, Transmission Owner, Balancing Authority, Reliability Coordinator, Generator Operator, Transmission Service Provider, Load Serving Entity or Distribution Provider is found non-compliant, it shall keep information related to the non-compliance until found compliant." We feel that this is not appropriate in a</p>

Organization	Yes or No	Question 12 Comment
		<p>reliability standard since it is already mandated through Compliance Violation Investigations (CVI). Also, we feel that it is more applicable to NERC’s Rules of Procedure. Therefore, we suggest it be removed from the standard.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT sees some merit in your recommendation to hand over COM-002 to this OPCP SDT but the RC SDT and the OPCP SDT are at a stage in the standards development process where that change would impede progress on both initiatives. The drafting teams are coordinating the efforts of the two SDTs to address issues and to ensure there are no conflicts. As envisioned, the COM-002 standard will be retried when COM-003 becomes effective.</p> <p>The SDT also agrees with your statement that using proper communications protocol during normal operating situations is as important as during emergencies. We have removed the phrase "especially during alerts and emergencies" from the purpose statement. It now reads: “To specify clear, formal and universally applied communication protocols that reduce the possibility of miscommunication which could lead to action or inaction harmful to the reliability of the BES.”</p> <p>In addition, the SDT created the proposed term “Operations Communications” that applies to any communications that will change the state of the BES.</p> <p>The SDT appreciates the comment in regard to the word “timely” being used in the Purpose statement of the proposed standard. Since none of the Requirements specify a time limit for executing the required communications, the SDT removed “timely”.</p> <p>The SDT appreciates the comment in regard to Data Retention for an entity which is found to be non-compliant. The SDT developed this language to be consistent with the NERC Standard Drafting Team Guidelines. This has been updated to now say, “until mitigation is complete”</p>		
Great River Energy	Agree	<p>GRE believes that the existing standard COM-002 is actually better than this standard. This standard actually causes more confusion and ambiguity and creates unnecessary or overly cumbersome requirements that add little or no value to reliability.</p>
<p>Response: The SDT thanks you for your comments. The SDT feels that the current version of the draft COM-003-1 standard clarifies a lot of industry concerns and will contribute greater value to reliability.</p>		
PPL	Agree	<p>If this draft standard would be approved as it is currently proposed, the implementation plan is way too short considering all the process and system changes that are needed to comply with the numerous additional requirements.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT has made several changes to the draft standard that will simplify the Implementation Plan. The SDT has reviewed the Implementation Plan</p>		

Organization	Yes or No	Question 12 Comment
<p>and extended it to give a minimum of six months following approval before the new requirements become effective.</p>		
<p>NextEra Energy Resources, LLC</p>	<p>Agree</p>	<p>In the case of nuclear plant operations, NRC communication requirements and the requirements of NERC NUC-001 for nuclear facilities more than adequately cover communication requirements. COM-003 should not be applicable to Nuclear Generator Operators since doing so will introduce an additional, unnecessary, and potentially conflicting level of requirements.</p> <p>Measures: Next Era suggests that the SDT clarify the periodicity of providing evidence of compliance and on what constitutes sufficient evidence of CPOP acceptance.</p> <p>Violation Severity Levels: Next Era encourages the SDT to revisit the violation severity levels. In the case of most of the requirements it is unreasonable to levy Severe penalties in instances where the operator may have deviated from the requirements but the communication occurred in an unencumbered and successful manner as evidenced by the use/acknowledgement outcomes of three-part communication.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT has reviewed NUC 001, specifically R9.4 and could not readily find a conflict with the second draft of COM 003. The SDT would expect the entities affected to incorporate the Requirements of COM 003 where applicable.</p> <p>The SDT has deleted the requirement for a CPOP in the second draft of COM-003-1.</p> <p>The SDT has modified the VRFs and VSLs to comply with approved NERC and FERC guidelines. All requirements in the second draft of the standard have been assigned a Medium VRF. The SDT believes the new assignments more accurately classify the VRFs and VSLs assigned to the Requirements in COM-003-1.</p>		
<p>Transmission Owner</p>	<p>Agree</p>	<p>In the case of nuclear plant operations, NRC communication requirements and the requirements of NERC NUC-001 for nuclear facilities more than adequately cover communication requirements. COM-003 should not be applicable to Nuclear Generator Operators since doing so will introduce an additional, unnecessary, and potentially conflicting level of requirements</p> <p>Measures: FPL suggests that the SDT clarify the periodicity of providing evidence of compliance and on what constitutes sufficient evidence of CPOP acceptance.</p> <p>Violation Severity Levels: FPL encourages the SDT to revisit the violation severity levels. In the case of most of the requirements it is unreasonable to levy severe penalties in instances where the operator may have deviated from the requirements but the communication occurred in an unencumbered and successful manner as evidenced by the use/acknowledgement outcomes of three-part communication.</p>

Organization	Yes or No	Question 12 Comment
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT has reviewed NUC 001, specifically R9.4 and could not readily find a conflict with the second draft of COM 003. The SDT would expect the entities affected to incorporate the Requirements of COM 003 where applicable.</p> <p>The SDT has deleted the requirement for a CPOP in the second draft of COM-003-1.</p> <p>The SDT has modified the VRFs and VSLs to comply with approved NERC and FERC guidelines. All requirements in the second draft of the standard have been assigned a Medium VRF. The SDT believes the new assignments more accurately classify the VRFs and VSLs assigned to the Requirements in COM-003-1.</p>		
Northeast Utilities	Agree	<p>Many of the requirement proposed in this posting either reiterate the drafts as posted (i.e. English language) or introduce confusion when compared to the drafts as posted. The scope should be limited to R2 and R7, so as not to duplicate or contradict the on-going work of other SDTs. (Agree = Yes)</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT feels that the requirements in the second draft of COM 003 are appropriate because they comply with the purpose identified in the SAR. The SDT also is aware of the efforts and progress of other SDTs and coordinates with them in order to avoid duplicative efforts or contradiction.</p>		
NERC Staff	Agree	<p>NERC staff questions whether this standard applies to the Transmission Service Provider and the Transmission Owner. It is unclear from the functional model where they would be involved in real-time operations communications.</p> <p>It is also unclear why the Violation Risk Factor for every requirement is High, and the Violation Severity Level for all but the first requirement is Severe. This automatically elevates any violation of any of these requirements to the highest penalty level that is imposed. The NERC staff recommends that the SDT review the latest guidelines for assignment of VSLs and consider alternatives that could expand/graduate the VSLs to account for varying severity of non-compliances.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT appreciates the comments with regards to concerns related to including TSPs. The SDT has removed the TSPs because they were not bound by this requirement in the originating SAR. The SDT removed the Transmission Service Provider and Transmission Owner from the second draft of the standard. The intent of the proposed standard is to apply only to those entities that send or receive "Operating Communications." The SDT has modified the VRFs and VSLs to comply with approved NERC and FERC guidelines. All requirements in the second draft of the standard have been assigned a Medium VRF. The SDT believes the new assignments more accurately classify the VRFs and VSLs assigned to the Requirements in COM-</p>		

Organization	Yes or No	Question 12 Comment
003-1.		
Westar Energy	Agree	no additional comments
Orange and Rockland Utilities, Inc.	Disagree	No additional Comments
Response: The SDT thanks you for your participation.		
NorthWestern Energy	Agree	NorthWestern feels that the current communication standards are sufficient for reliable BES Operations.
Response: The SDT thanks you for your comments. The SDT respectfully points out that various FERC Orders and Directives (FERC Order 693 P531) supported by the findings of the Blackout Report Recommendation #26 states, communication protocols should be tightened especially those for alerts and emergency communications. That communication protocols be tightened and suggested a new COM Reliability Standard as an acceptable approach. The SAR for this SDT charged the team to “tighten communication protocols, especially for communications during alerts and emergencies.” Additionally the SAR required “the use of specific communication protocols, enabling information to be efficiently conveyed and mutually understood for all operating conditions.”		
PEF	Agree	<p>PEF believes additional NERC defined entities (such as Generators Owners) should be made applicable to this standard. Specifically, PEF believes that the Interchange Authority should be added due to the communications required between the Reliability Coordinator and the Interchange Authority.</p> <p>PEF also believes that the adoption of R4 would have major implications on the tagging process. PEF believes that all tagging would be required to be done using CST due to schedule check-out between BAs, TSPs, LSEs and RCs. Therefore, PSEs should be made applicable as well for R3 and R4.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The proposed standard has been made applicable to the Functional Entities defined by the SAR. The intent of the proposed standard is to apply only to those entities that send or receive Operating Communications and own and operate Facilities on the BES as a result of those communications.</p> <p>The SDT understands your concerns and is proposing an alternative requirement in the second draft of COM 003 which we believe will address your concerns. Instead of requiring the use of a single continent-wide time zone, the standard now requires that during Operating Communication an applicable entity shall explicitly state the time and time zone, and indicate whether the time is daylight saving or standard time, when</p>		

Organization	Yes or No	Question 12 Comment
<p>communicating with one or more entities in a different time zone.</p>		
<p>Long Island Power Authority</p>	<p>Agree</p>	<p>R1 requires each entity to create a CPOP. There is not a requirement to coordinate CPOP’s amongst entities beyond the requirements in the Standard. There is no requirement to exchange CPOP’s between entities with an operating relationship. The SDT should consider adding a requirement either that allows entities with operating relationships to request and be provided a copy of the other’s CPOP, or a requirement requiring the exchange of CPOP between entities with operating relationships.</p> <p>Additionally, we cannot understand how all requirements but R1 have been determined to have a HIGH VRF when, many of them are dictating HOW communications should take place and not when and why or what. High Risk Factor requirement (a) is one that, if violated, could directly cause or contribute to bulk power system instability, separation, or a cascading sequence of failures, or could place the bulk power system at an unacceptable risk of instability, separation, or cascading failures. LIPA does not believe that any requirement in this Standard if violated would have the results specified in the definition of a High VRF, especially since these requirements are addressing the HOW of communication.</p>
<p>Response: The SDT thanks you for your comments. Many of the comments we received pointed out that this is an administrative function and not a reliability function. It has been decided by the SDT to delete the requirement for a CPOP in the second draft of COM-003-1.</p> <p>The SDT has modified the VRFs and VSLs to comply with approved NERC and FERC guidelines. All requirements in the second draft of the standard have been assigned a Medium VRF. The SDT believes the new assignments more accurately classify the VRFs and VSLs assigned to the Requirements in the second draft of COM-003-1.</p>		
<p>Bonneville Power Administration</p>	<p>Agree</p>	<p>R3 creates a special need for multi language operators. US and US-involved entities need to use English in all instances, not only for reliability purposes, but for internal communication purposes and to be able to hire replacements without competing for an artificially small set of operators and to be auditable by NERC.</p>
<p>Response: The SDT thanks you for your comments. The SDT agrees that English is the mandatory language for "Operating Communications" except where another language is mandated by law or regulation.</p>		
<p>We Energies</p>	<p>Agree</p>	<p>Remove “timely” from the Purpose section, since a time period is not part of any requirement.</p> <p>According to the NERC Reliability Standards Development Procedure, Compliance Monitoring Period and Reset are required elements, and should be included. M1 through M7 should indicate which requirement they pertain to.</p> <p>Compliance enforcement should be focused on Reliability Directives only. Rather than proving 100% compliance,</p>

Organization	Yes or No	Question 12 Comment
		<p>it is more practical if each party is obligated to report instances of unclear communication to the other party/parties involved in the Reliability Directive(s). Defining a remediation plan could be part of the requirement, with a measure being whether or not the remediation was implemented.</p> <p>An overall observation is that the intended communication updates could be implemented through modification of existing COM-001 & COM-002 standards without the need for another overlapping standard. Additional industry focus regarding communication protocols could be further emphasized through NERC System Operation Certification Program requirements and training.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The word “timely” has been removed from the purpose statement in the second draft of COM 003--1.</p> <p>The requirement for Compliance Monitoring Period and Reset has been removed from the RSDP – the RSDP was retired some time ago. Standards are now developed in accordance with the Standard Processes Manual.</p> <p>For the second draft of the standard, the SDT has added a reference to each Measure to identify the requirement it supports.</p> <p>Compliance will be applicable to all “Operating Communications” that alter the state of the Bulk Electric System. The terms “directive” and “Reliability Directive” have not been included in the second draft of COM-003.</p> <p>With regard to your proposal to report unclear communication, the SDT has changed the standard’s requirement to direct both parties involved in operating communications to repeat information until clarity is achieved among all parties. (See Requirements R2and R3 in the second draft of COM-003.)The SDT believes this will address your concern.</p> <p>The SDT feels that the existing COM standards are not clear in some instances and do not cover important communication protocols. The proposed plan is to retire COM-002 and any of its successors when COM-003 becomes effective.</p>		
Southern Company Transmission	Agree	<p>Southern Company supports SERC SOS comments.</p> <p>SERC SOS comments:</p> <p>This review group has identified several problems with this standard, as noted above.</p> <p>Other observations include:</p> <p>The effective dates in the draft standard and in the implementation plan do not seem to match. In the standard, the effective date mentions one calendar year following regulatory approval, while the implementation plan refers to the third calendar quarter after regulatory approval.</p> <p>The SDT has made several changes to the draft Standard that required changes to the Implementation Plan. The SDT updated the Implementation Plan to ensure the changes can be made in an appropriate time frame</p>

Organization	Yes or No	Question 12 Comment
		<p>and accurately reflect the changes to the Standard. In the second drafts of the COM-003 standard and Implementation Plan, the effective dates are identical and provide at least six months for entities to become compliant.</p> <p>Furthermore, we do not feel that any of the requirements in this standard warrant Violation Risk Factors or Violation Severity Levels in the high or severe category. In summary, this review group feels that COM-003-1 is not yet ready to be acted upon and may have been posted too soon.</p> <p>The SDT has modified the VRFs and VSLs to comply with approved NERC and FERC guidelines. In the second draft of the standard, all requirements have been assigned a Medium VRF. The SDT believes the new assignments more accurately classify the VRFs and VSLs assigned to the Requirements in the second draft of COM-003-1.</p> <p>There does not seem to be sufficient coordination between the drafting teams of all the COM standards, or any attempt to integrate these standards.</p> <p>The SDT is working with the RC SDT to avoid conflicts – and proposes retiring COM-002 when COM-003 becomes effective.</p> <p>One example is the inconsistency between COM-003-1 and COM-002-3 regarding the meaning of three-part communication (mentioned in our response to Question 1 above).As noted above, we feel that many of the requirements prescribe specific “how to” methods for compliance rather than focusing on the “what” of the requirement.</p> <p>Another way of looking at the requirements for three-part communication would be to say that the requirements specify “what” by requiring confirmation that the message was accurately received.</p> <p>Overall, COM-003-1 is much too prescriptive to be tied to million dollar-level fines.</p> <p>Southern Company comments:</p> <p>There are possible inconsistencies with the references to the term “CIP Free Form” and a more generic term “Free Form” in the tables described in Attachment 1 - COM-003-1 - Operating State Alert Levels. Reference the</p>

Organization	Yes or No	Question 12 Comment
		<p>fields where functional entities “outside” the Reliability Coordinator Area are identified for both the initial alert notification and the end of alert notification.</p> <ul style="list-style-type: none"> • For Physical Security, the field mentions only RC’s using the “CIP Free Form.” For Cyber Security, the field mentions RC’s and CIP Participants using the “CIP Free Form.” • For Transmission Emergency Alerts, the field mentions only RC’s using the generic “Free Form.” Is there a distinction between the two forms? • Is it consistent to reference CIP Participants only for Cyber Security alerts and not for Physical or Transmission? <p>The SDT has reviewed and addressed the form and participation issues you raised. The requirements associated with the Alert Levels have been removed from the second draft of the standard.</p> <p>Although this standard is well intentioned it is not ready for presentation to the ballot body. When this standard is applicable is in question just by the way the Title and Purpose are written. The Purpose needs to make it absolutely clear to all parties, complying entities as well as compliance enforcement, when the standard is applicable. For example, the Purpose of the standard is subject to interpretation. Does this standard apply all of the time or just during Alerts and Emergencies? Or does the word especially mean that a non-compliance during an emergency is more severe? Is the phonetic alphabet required when an alert is declared or just after the alert is declared?</p> <p>The SDT believes the Title is straightforward and has revised the Purpose Statement to read: “To specify clear, formal and universally applied communication protocols that reduce the possibility of miscommunication which could lead to action or inaction harmful to the reliability of the BES.” We believe this more accurately defines the problem and the solution.</p> <p>This standard has a charge: to address the requirements of the SAR, FERC Order 693 and the Blackout Report – item 26.</p> <p>The draft revisions, based on stakeholder comments, clarify applicability with the proposed definition of Operating Communications which could include routine as well as alert and emergency conditions.</p>
<p>Response: The SDT thanks you for your comments. Please see our responses above.</p>		
California	Agree	The Drafting team should take a hard look at the VRFs and VSLs established in this standard and contrast them

Organization	Yes or No	Question 12 Comment
Independent System Operator		<p>against VRFs and VSLs for other adopted standards. We do not feel, as an example, that the use of Spanish in a normal communication between two companies, while improper, should carry a VRF of ‘high’ with a VSL of ‘severe’. The draft standard focuses too much attention on prescriptive remedy than ensuring understanding.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT has modified the VRFs and VSLs to comply with approved NERC and FERC guidelines. In the second draft of the standard, all requirements have been assigned a Medium VRF. The SDT believes the new assignments more accurately classify the VRFs and VSLs assigned to the Requirements in the second draft of COM-003-1.</p>		
Hydro-Québec TransEnergie	Agree	<p>The existing standard COM-002 is better than this proposed Standard. This Standard actually causes more confusion and ambiguity, and creates unnecessary or overly cumbersome requirements that add little or no value to reliability. All requirements with the exception of R1 have been determined to have a HIGH VRF, when many of them are dictating HOW communications should take place and not when, why, or what.COM-002 retirement does not appear to be consistent with the direction of the RC SDT in Project 2006-06. The RC SDT is adding requirements. More coordination is required between the Standard Drafting Teams. Again, we support the work being done by the RC SDT and RTO SDT and do not believe this adds more necessary requirements.</p> <p>The SDT respectfully disagrees with you statement regarding COM-002 as a superior standard. We do not see it as comparative nor do we feel the second draft of COM-003 creates unnecessary or overly cumbersome requirements that add little or no value to reliability. The SDTs are coordinating issues to ensure there are no conflicts and that one standard supports the requirements of the other. Note that the implementation plan for COM-003 includes retirement of COM-002.</p> <p>Many of the requirements proposed in this posting either reiterate the drafts as posted (i.e. English language) or introduce confusion when compared to the drafts as posted.</p> <p>The SDTs should limit their scope to R2 and R7, so as not to duplicate or contradict the on-going work of other SDTs.</p> <p>The SDT feels that the requirements in the second draft of COM 003 are appropriate because they support the purpose identified in the SAR.</p> <p>The SDT appears to have adopted severe violations for every infraction. There should be some gradations, using</p>

Organization	Yes or No	Question 12 Comment
		<p>increasing severity based on the number of or severity of any infractions.</p> <p>The SDT has modified the VRFs and VSLs to comply with approved NERC and FERC guidelines. In the second draft of the standard, all requirements have been assigned a Medium VRF. The SDT believes the new assignments more accurately classify the VRFs and VSLs assigned to the requirements in second draft of COM-003-1.</p> <p>Definitions: The standard should define other terms, as well, including the following:</p> <ul style="list-style-type: none"> o reliability-related information, o "... state or status of an element or facility of the BES ... <p>The SDT has eliminated the three original definitions to the proposed COM-003-1 standard and defined Operating Communication in the revised draft to address industry comments.</p> <p>Note that in the second draft of COM-003, the SDT did capitalize the terms, "Element" and "Facility" to ensure their meaning is clear.</p> <p>"The standard should also have provision to include the boundaries (components) of an "element," and the meaning of the terms "state or status" in the written communication protocol. For example, is the gas compressor of a 345kV breaker considered part of this element, and so would a change in its "state or status" be covered?</p> <p>Element is a defined term in the NERC Glossary – in the revised standard the term has been capitalized for clarity.</p> <p>The VRFs for R2-R7 are all "High", and the VSLs are all "Severe" are too harsh. Failing to comply with one of the requirements does not automatically mean that a miscommunication occurred that caused a reliability problem. There should be a "Moderate" VSL for failure to comply with a requirement, but no miscommunication occurred. There should be a "High" VSL for failure to comply with a requirement that caused a miscommunication but resulted in no violation of another reliability standard. The "Severe" VSL should only apply to failures to comply with a requirement that caused a miscommunication that lead to a violation of another reliability standard, or caused a reliability problem.</p> <p>SDT has modified the VRFs and VSLs to comply with approved NERC and FERC guidelines. In the second draft of</p>

Organization	Yes or No	Question 12 Comment
		<p>the standard, all requirements have been assigned a Medium VRF. The SDT believes the new assignments more accurately classify the VRFs and VSLs assigned to the Requirements in the second draft of COM-003-1.</p> <p>In addition, as stated earlier, this Standard focuses on “how” certain tasks should be performed and conflicts with NERC’s position of pursuing performance based and results based Standards.</p> <p>The SDT was chartered to develop Communication Protocols for Operating Personnel. The SDT proposes that the second draft of the standard is more focused on “what” protocols to use in specific situations.</p> <p>The SDT does not believe its work to be inconsistent with results-based principles. The Need or Problem Statement for this standard is that miscommunication can lead to action or inaction harmful to the reliability of the BES. This was identified by the NERC President in his January 2011 report to the industry as one of the eight top priority issues for BPS reliability, and there are a number of events that have occurred in the past where miscommunication was a contributing factor to the event or exacerbated the severity of the event. The goal, therefore, is to specify clear, formal and universally applied communication protocols that reduce the possibility of miscommunication. The key objective to accomplish this goal is to use communication protocols to reduce or correct misunderstandings. The requirements have been revised to better accomplish this objective, and are risk-mitigating requirements (while operator performance is measured, the actions themselves are primarily designed to mitigate the risk of miscommunication that could lead to poor BES performance). We believe this standard is consistent with results-based principles, and it will improve the reliability of the BES.</p> <p>Based on these considerations, work on this Standard should be stopped until work on Project 2006-06 has been completed and approved. This approach is consistent with the August 2003 Blackout Recommendation #26 “failure to identify emergency conditions and communicate that status to neighboring systems, and upgrade communication system hardware where appropriate” which actually focused on communications during emergencies, which is the scope of Project 2006-06. After Project 2006-06 is completed, a determination can be made on the disposition of this Standard. This Standard should be effective uniformly continent-wide.</p> <p>The SDT respectfully disagrees with your statement that the team should stop work on COM-003-1 until project 2006-6 is complete.</p> <p>The SDT is working in accordance with the August 2003 Blackout Recommendation #26 and FERC Order 693</p>

Organization	Yes or No	Question 12 Comment
		directives.
<p>Response: The SDT thanks you for your comments. Please see our responses above.</p>		
<p>Northeast Power Coordinating Council</p>	<p>Agree</p>	<p>The existing standard COM-002 is better than this proposed Standard. This Standard actually causes more confusion and ambiguity, and creates unnecessary or overly cumbersome requirements that add little or no value to reliability. All requirements with the exception of R1 have been determined to have a HIGH VRF, when many of them are dictating HOW communications should take place and not when, why, or what.COM-002 retirement does not appear to be consistent with the direction of the RC SDT in Project 2006-06. The RC SDT is adding requirements. More coordination is required between the Standard Drafting Teams. Again, we support the work being done by the RC SDT and RTO SDT and do not believe this adds more necessary requirements.</p> <p>The SDT respectfully disagrees with you statement regarding COM-002 as a superior standard. We do not see it as comparative nor do we feel the second draft of COM-003 creates unnecessary or overly cumbersome requirements that add little or no value to reliability. The SDTs are coordinating issues to ensure there are no conflicts and that one standard supports the requirements of the other. Note that the implementation plan for COM-003 includes retirement of COM-002.</p> <p>Many of the requirement proposed in this posting either reiterate the drafts as posted (i.e. English language) or introduce confusion when compared to the drafts as posted.</p> <p>The SDTs should limit their scope to R2 and R7, so as not to duplicate or contradict the on-going work of other SDTs.</p> <p>The SDT feels that the requirements in the second draft of COM 003 are appropriate because they support the purpose identified in the SAR.</p> <p>The SDT appears to have adopted severe violations for every infraction. There should be some gradations, using increasing severity based on the number of or severity of any infractions.</p> <p>Definitions: The standard should define other terms, as well, including the following:</p> <ul style="list-style-type: none"> o reliability-related information, o "... state or status of an element or facility of the BES ... <p>The SDT has eliminated the 3 original definitions to the proposed COM-003-1 standard and defined Operating</p>

Organization	Yes or No	Question 12 Comment
		<p>Communication in the revised draft to address industry comments. The SDT believes the two terms identified are well understood and do not need further definition. Note that in the second draft of COM-003, the SDT did capitalize the terms, “Element” and “Facility” to ensure their meaning is clear.</p> <p>”The standard should also have provision to include the boundaries (components) of an “element,” and the meaning of the terms “state or status” in the written communication protocol. For example, is the gas compressor of a 345kV breaker considered part of this element, and so would a change in its “state or status” be covered? Similarly, is the heat trace inside a 345kV breaker control cabinet part of this element or not?</p> <p>Element is a defined term in the NERC Glossary – in the revised standard the term has been capitalized for clarity.</p> <p>The VRFs for R2-R7 are all “High”, and the VSLs are all “Severe” are too harsh. Failing to comply with one of the requirements does not automatically mean that a miscommunication occurred that caused a reliability problem. There should be a “Moderate” VSL for failure to comply with a requirement, but no miscommunication occurred. There should be a “High” VSL for failure to comply with a requirement that caused a miscommunication but resulted in no violation of another reliability standard. The “Severe” VSL should only apply to failures to comply with a requirement that caused a miscommunication that lead to a violation of another reliability standard, or caused a reliability problem.</p> <p>SDT has modified the VRFs and VSLs to comply with approved NERC and FERC guidelines. In the second draft of the standard, all requirements have been assigned a Medium VRF. The SDT believes the new assignments more accurately classify the VRFs and VSLs assigned to the Requirements in the second draft of COM-003-1.</p> <p>In addition, as stated earlier, this Standard focuses on “how” certain tasks should be performed and conflicts with NERC’s position of pursuing performance based and results based Standards.</p> <p>The SDT was chartered to develop Communication Protocols for Operating Personnel. The SDT proposes that the second draft of the standard is more focused on “what” protocols to use in specific situations.</p> <p>The SDT does not believe its work to be inconsistent with results-based principles. The Need or Problem Statement for this standard is that miscommunication can lead to action or inaction harmful to the reliability of the BES. This was identified by the NERC President in his January 2011 report to the industry as one of the</p>

Organization	Yes or No	Question 12 Comment
		<p>eight top priority issues for BPS reliability, and there are a number of events that have occurred in the past where miscommunication was a contributing factor to the event or exacerbated the severity of the event. The Goal, therefore, is to specify clear, formal and universally applied communication protocols that reduce the possibility of miscommunication. The key Objective to accomplish this Goal is to use communication protocols to reduce or correct misunderstandings. The requirements have been revised to better accomplish this Objective, and are risk-mitigating requirements (while operator performance is measured, the actions themselves are primarily designed to mitigate the risk of miscommunication that could lead to poor BES performance). We believe this standard is consistent with results-based principles, and it will improve the reliability of the BES.</p> <p>Based on these considerations, work on this Standard should be stopped until work on Project 2006-06 has been completed and approved. This approach is consistent with the August 2003 Blackout Recommendation #26 “failure to identify emergency conditions and communicate that status to neighboring systems, and upgrade communication system hardware where appropriate” which actually focused on communications during emergencies, which is the scope of Project 2006-06. After Project 2006-06 is completed, a determination can be made on the disposition of this Standard. This Standard should be effective uniformly continent-wide.</p> <p>The SDT respectfully disagrees with your statement that the team should stop work on COM-003-1 until project 2006-6 is complete.</p> <p>The SDT is working in accordance with the August 2003 Blackout Recommendation #26 and FERC Order 693 directives.</p>
<p>Response: The SDT thanks you for your comments. Please see our responses above.</p>		
<p>Transmission Agency of Northern California</p>	<p>Agree</p>	<p>The requirements of this standard as drafted should not be applicable to Transmission Owners (TO). This standard pertains to real-time operations, whereas the TO function does not have real-time operational responsibilities according to the currently effective and proposed NERC Reliability Functional Model, Versions 4 and 5, respectively.</p>
<p>Response: The SDT appreciates the comment in regard to COM-003-1 applying to Transmission Owners and the SDT has deleted the Transmission Owners from the second draft of the standard. The intent of the proposed standard is to apply only to those operating entities that send or receive Operating Communications.</p>		

Organization	Yes or No	Question 12 Comment
Santee Cooper	Agree	The SDT has put a lot of work into this standard and we appreciate their effort. The SDT of COM-002 and COM-003 may need to integrate the reliability related requirements of these two standards into one standard that the industry can approve. This standard as written could lead to some extremely high dollar fines when in reality the reliability of the bulk electric system has not been affected at all.
<p>Response The SDT thanks you for your comments and recommendation.</p> <p>The SDTs are coordinating issues to ensure consistency and to avoid duplication and conflict. The implementation plan for COM-003 includes retirement of COM-002 to avoid duplication.</p>		
South Carolina Electric and Gas	Agree	The SDT should consider vertically integrated utilities, where communication between functional entities is internal.
<p>Response: The SDT thanks you for your comments. The SDT determined that operations communications that change or maintain the state, status, output, or input of an Element or Facility of the Bulk Electric System are subject to the requirements of the proposed COM-003-1 standard whether they be external or internal.</p>		
Electric Market Policy	Agree	The VRFs for R2-R7 are all “High”, and the VSLs are all “Severe”. That is too harsh. Failing to comply with one of the requirements does not automatically mean that a miscommunication occurred that caused a reliability problem. There should be a “Moderate” VSL for failure to comply with a requirement but no miscommunication occurred. There should be a “High” VSL for failure to comply with a requirement that caused a miscommunication but resulted in no violation of another reliability standard. The “Severe” VSL should only apply to failures to comply with a requirement that caused a miscommunication that lead to a violation of another reliability standard. If approved, this standard will require a number of distracting things be added to each entity’s control center with little value added. Clock - set to the ‘standard time’ Attachment 1 - COM-003 (all 3 versions) Attachment 2 - COM-003
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT has modified the VRFs and VSLs to comply with approved NERC and FERC guidelines. The second draft of the standard proposes assigning a Medium VRF to each of the requirements. The SDT believes the new assignments more accurately classify the VRFs and VSLs assigned to the Requirements in the second draft of COM-003-1.</p> <p>The SDT would like clarification on your comment “Clock - set to the ‘standard time’ Attachment 1 - COM-003 (all 3 versions) Attachment 2 - COM-003” if the current draft of the Standard does not address your concerns.</p>		

Organization	Yes or No	Question 12 Comment
Progress Energy Carolina, Inc	Agree	This proposed revision, if implemented, may introduce unnecessary complications into communications between entities which may lead to delays and misunderstandings, potentially decreasing the reliability of the BES.
<p>Response: The SDT thanks you for your comments. The SDT does not recognize any specific details in your comment. If the revised draft of the Standard does not address your specific concerns please provide details for the SDT to address.</p>		
The Empire District Electric Company	Disagree	This proposed standard seems to be a redundant standard to many other already approved NERC standards such as CIP-001, EOP-001, EOP-004, as well as the NERC alert process. I see little to no benefit from this standard as proposed.
<p>Response: The SDT thanks you for your comments. The SDT does not see any redundant requirements in the standards you cite in your comments.</p>		
SERC OC&SOS Standards Review Group	Agree	<p>This review group has identified several problems with this standard, as noted above. Other observations include:</p> <p>The effective dates in the draft standard and in the implementation plan do not seem to match. In the standard, the effective date mentions one calendar year following regulatory approval, while the implementation plan refers to the third calendar quarter after regulatory approval.</p> <p>The SDT has made several changes to the draft standard that resulted in changes to the Implementation Plan. The effective dates in the second drafts of the standard and Implementation Plan are identical and provide at least six months for entities to become compliant.</p> <p>Furthermore, we do not feel that any of the requirements in this standard warrant Violation Risk Factors or Violation Severity Levels in the high or severe category</p> <p>The SDT has modified the VRFs and VSLs to comply with approved NERC and FERC guidelines. In the second draft of the standard the SDT proposed a Medium VRF for each of the requirements. The SDT believes the new assignments more accurately classify the VRFs and VSLs assigned to the Requirements in the second draft of COM-003-1.</p> <p>In summary, this review group feels that COM-003-1 is not yet ready to be acted upon and may have been posted too soon. There does not seem to be sufficient coordination between the drafting teams of all the COM standards, or any attempt to integrate these standards. One example is the inconsistency between COM-003-1</p>

Organization	Yes or No	Question 12 Comment
		<p>and COM-002-3 regarding the meaning of three-part communication (mentioned in our response to Question 1 above).</p> <p>The OPCP SDT has been and is aware of the progress and content of other COM standard development teams. The implementation plan for COM-003 includes retirement of COM-002 to avoid duplication.</p> <p>As noted above, we feel that many of the requirements prescribe specific “how to” methods for compliance rather than focusing on the “what” of the requirement.</p> <p>The OPCP SDT was chartered to develop Communication Protocols for Operating Personnel. The SDT proposes that the second draft of the standard is more focused on “what” protocols to use in specific situations.</p> <p>Overall, COM-003-1 is much too prescriptive to be tied to million dollar-level fines.</p> <p>The SDT acknowledges your concerns and wishes to balance them with the need for reliability on the BES. With the changes to VRFs, (Medium in the second draft of COM-003) the fear of million dollar-level fines should be relieved.</p> <p>“The comments expressed herein represent a consensus of the views of the named members of the SERC OC&SOS Standards Review group only and should not be construed as the position of SERC Reliability Corporation, its board or its officers.”</p>
<p>Response: The SDT thanks you for your comments. Please see our responses above.</p>		
NIPSCO	Disagree	<p>This standard is based on COM-002-3 however that standard has not been voted-in or NERC approved yet. I think this COM-003 effort should be put on hold until the 2006-06 project is complete. At that time the term "directive" should be replaced by "Operational Directive" and "Reliability Directive" based on context and all of these terms should be defined in the NERC Glossary of Terms.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT respectfully disagrees with your statement that the team should stop work on COM-003-1 until project 2006-6 is complete. The SDTs are coordinating issues to ensure consistency, eliminate conflict and avoid duplication. The implementation plan for COM-003 includes retirement of COM-002 to avoid duplication.</p> <p>The SDT has eliminated the term “Interoperability Communications” and revised the draft standard to include the new term “Operating</p>		

Organization	Yes or No	Question 12 Comment
<p>Communications". The SDT feels this term will clarify the issues you have raised. The term "Reliability Directive" is being developed in a different standard by the RC SDT.</p>		
<p>Indiana Municipal Power Agency</p>	<p>Agree</p>	<p>This standard is not needed because requirement two in COM-002 takes into account the use of Three-part Communication which is the main reliability requirement from COM-003. The use of a procedure (R1), the English language (R3), a standard time zone (R4), the NATO phonetic alphabet (R6), and a pre-defined system condition terminology (R2) are administrative requirements (not performance based requirements) and if not used, all of them definitely do not have a high VRF. If an entity does not use a procedure, but ensures they follow requirement 2 of COM-002 and both parties have a clear understanding of the directive what other reliability requirement is necessary. One recommendation might be for the COM-002 Standard Drafting Team or another SDT to come up with a definition for a directive.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT sees the Requirements of COM 003-1 as key operations communication protocols that will standardize the manner in which Functional entities communicate BES matters thereby reducing the potential for mishaps due to miscommunications. The SDT does not feel that they are "administrative requirements".</p> <p>The SDT has modified the VRFs and VSLs to comply with approved NERC and FERC guidelines. In the second draft of the standard the SDT proposed a Medium VRF for each of the requirements. The SDT believes the new assignments more appropriately classify the VRFs and VSLs assigned to the Requirements in the second draft of COM-003-1.</p> <p>The Implementation Plan calls for COM -002 R2 to be retired when COM-003-1 becomes effective.</p> <p>The SDT has eliminated the term "Interoperability Communications" and revised COM-003 to include the new term "Operating Communications". The SDT feels this term will clarify your concerns. The term "Reliability Directive" is being developed in a standard under development, COM-002-3, by the RC SDT.</p>		
<p>Tri-State Generation & Transmission Assoc.</p>	<p>Agree</p>	<p>This standard should not apply to DPs, LSEs or TSPs as they do not have control over the BES. That responsibility resides entirely with the TOP. Additionally, it is concerning that the term "directive" is not defined. The proposed definition for Interoperability Communication could be interpreted to include all communication between entities. This is too restrictive.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT appreciates the comments with regards to concerns related to including TSPs, DPs and LSEs that do not own or operate facilities that are a part of the BES. The SDT has removed the TSPs and LSEs because they were not bound by this requirement in the originating SAR. The specified role</p>		

Organization	Yes or No	Question 12 Comment
<p>of the DP to shed load justifies the retention of the DP as an applicable Entity.</p> <p>The SDT has eliminated the term “Interoperability Communications” and revised the draft standard to include the new term “Operating Communications”. The SDT feels this term will address your concerns. The term “Reliability Directive” is being developed in a standard under development, COM-002-3, by the RC SDT.</p>		
E.ON U.S. LLC	Disagree	<p>This standard should only apply to alerts and emergencies. E.ON U.S. suggests eliminating “especially” in the purpose statement of COM-003-1. During emergency situations, operational focus on the semantics of how communications are to occur does little to enhance the reliability of the system. High VRFs with Severe VSLs may add stress and distraction to operation personnel during times of emergency thus potentially harming, not improving reliability.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The term “especially” has been removed from the Purpose Statement. It now reads: “To specify clear, formal and universally applied communication protocols that reduce the possibility of miscommunication which could lead to action or inaction harmful to the reliability of BES.”</p> <p>The SDT disagrees with the statement “This standard should only apply to alerts and emergencies”. Is there a difference if a miscommunication causing a reliability event occurs during routine operations or during alerts or emergency operations? The SDT believes the impact on the BES would be the same.</p> <p>The SDT has no knowledge that “stress and distraction induced by high VSRs and VSL severity levels to operation personnel during times of emergency thus potentially harming, not improving” reliability will occur, and has no response to that comment. Note, however, that the SDT revised the VRFs and VSLs in the second draft of COM-003 to better align with NERC and FERC guidelines – and the VRFs for the revised requirements are “Medium.”</p>		
American Electric Power	Agree	<p>Unfortunately, the standard seems to be losing its value as the emphasis overly focusing on procedures while missing the intent. The SDT should reconsider the standard in the context of “what” rather than “how.” Lastly, we do not believe that this standard is ready to advance and needs significant re-working before the revised draft is posted. The SDT should attempt to better coordinate with the necessary other drafting teams as these standards are integrated.</p>
<p>Response: The SDT thanks you for your comments.</p> <p>The SDT was chartered to develop Communication Protocols for Operating Personnel. The SDT proposes that the second draft of the standard is more focused on “what” protocols to use in specific situations.</p> <p>The SDT has made significant changes to the original draft to address valid concerns from the Industry.</p>		

Organization	Yes or No	Question 12 Comment
<p>The SDTs involved with various COM standard projects have been and are coordinating to ensure consistency, to avoid conflict and to avoid duplication.</p>		
<p>Independent Electricity System Operator</p>	<p>Agree</p>	<p>We believe that the existing standard COM-002 can be simply modified to cover the 3-part communication requirement. This COM-003 standard actually causes more confusion and ambiguity, and creates unnecessary or overly cumbersome requirements that add little or no value to reliability. This standard is not needed.</p>
<p>Response: The SDT thanks you for your comments The SDT believes the revised COM-003-1 standard is more appropriate as a location for three-part communications because it focuses on communications protocol. The SDT respectfully disagrees with your comments regarding “This COM-003 standard actually causes more confusion and ambiguity, and creates unnecessary or overly cumbersome requirements that add little or no value to reliability.” We also respectfully disagree with your comments that “This standard is not needed”.</p>		
<p>IRC Standards Review Committee</p>	<p>Agree</p>	<p>The existing standard COM-002 is better than this proposed Standard. This Standard actually causes more confusion and ambiguity, and creates unnecessary or overly cumbersome requirements that add little or no value to reliability. All requirements with the exception of R1 have been determined to have a HIGH VRF, when many of them are dictating HOW communications should take place and not when, why, or what.COM-002 retirement does not appear to be consistent with the direction of the RC SDT in Project 2006-06. The RC SDT is adding requirements. More coordination is required between the Standard Drafting Teams. Again, we support the work being done by the RC SDT and RTO SDT and do not believe this adds more necessary requirements.</p> <p>The SDT respectfully disagrees with you statement regarding COM-002 as a superior standard. We do not see it as comparative nor do we feel the second draft of COM-003 creates unnecessary or overly cumbersome requirements that add little or no value to reliability.</p> <p>The COM related SDTs are coordinating to ensure there are no conflicts and that one standard supports the requirements of the other. The implementation plan for COM-003 includes retirement of COM-002 to avoid duplication.</p> <p>The SDT has modified the VRFs and VSLs to comply with approved NERC and FERC guidelines. In the second draft of the standard the SDT proposed a Medium VRF for each of the requirements. The SDT believes the new assignments more appropriately classify the VRFs and VSLs assigned to the Requirements in the second draft of COM-003-1.</p>

Organization	Yes or No	Question 12 Comment
		<p>Recommendation 26 of the August 14, 2003 blackout report is cited as a driver for extending three-part communications. We believe the title of Recommendation 26 is misleading and when reviewed separately from the supporting text of the recommendation and direct and contributing factors in the report results in an incorrect interpretation. “Failure to identify emergency conditions and communicate that status to neighboring systems” is one of the contributing factors and the supporting text of the recommendation clearly refer to shoring up communications during emergency and anticipated emergency conditions and establishing an emergency broadcast communication system to alert regulatory, state and local officials. The supporting text of Recommendation 26 only mentions addressing alerts, emergencies or other critical situations. Some have incorrectly inferred the initial clause of Recommendation 26, “Tighten communication protocols”, means the recommendation applies to all routine communications.</p> <p>The SDT cites additional “Recommendation 26 of the August 14, 2003 Blackout Report” text from the from the same section you are referencing:</p> <p>“On August 14, 2003, reliability coordinator and control area communications regarding conditions in northeastern Ohio were in some cases ineffective, unprofessional, and confusing. Ineffective communications contributed to a lack of situational awareness and precluded effective actions to prevent the cascade. Consistent application of effective communications protocols, particularly during alerts and emergencies, is essential to reliability. “</p> <p>There are several key points here:</p> <p>Clearly, ineffective, unprofessional, and confusing communications contributed to a lack of situational awareness and precluded effective actions to prevent the cascade.</p> <p>Note the context of this statement especially the word “particularly (“Consistent application of effective communications protocols, particularly during alerts and emergencies, is essential to reliability.”). It is apparent to the SDT that this means all communication should be subject to consistent, structured protocols. The use of “particularly” and “especially” (used in the Recommendation text) are used for emphasis only for alerts and emergencies and the intent is not to exclude other types of communications.</p> <p>The SDT believes the text of Recommendation 26 is very clear and is in no way misleading or confusing and that the Recommendation means exactly what it says: Tighten communications protocols, especially for communications during alerts and emergencies.</p>

Organization	Yes or No	Question 12 Comment
		<p>Also please read FERC Order 693 paragraph 532 to review clarification on the application of three-part communications to routine directives. The SDT is working in accordance with the August 2003 Blackout Recommendation #26 and FERC Order 693 directives.</p> <p>The first paragraph in Attachment 1 of COM-003-1 an EEA is stated as being an Emergency Energy Alert rather than an Energy Emergency Alert. This should be corrected for consistency with other standards and to avoid confusion. Also in this paragraph, the term "states" should be replaced with "levels" in order to maintain consistency with the tables in the Attachment as well as EOP-002-2.1 to which this Attachment refers.</p> <p>The SDT has removed the requirement that required use of alert levels from the second draft of the standard.</p>
<p>Response: The SDT thanks you for your comments. Please see our responses above.</p>		
<p>ISO New England Inc.</p>	<p>Agree</p>	<p>The existing standard COM-002 is better than this proposed Standard. This Standard actually causes more confusion and ambiguity, and creates unnecessary or overly cumbersome requirements that add little or no value to reliability. All requirements with the exception of R1 have been determined to have a HIGH VRF, when many of them are dictating HOW communications should take place and not when, why, or what.COM-002 retirement does not appear to be consistent with the direction of the RC SDT in Project 2006-06. The RC SDT is adding requirements. More coordination is required between the Standard Drafting Teams. Again, we support the work being done by the RC SDT and RTO SDT and do not believe this adds more necessary requirements.</p> <p>The SDT respectfully disagrees with you statement regarding COM-002 as a superior standard. We do not see it as comparative nor do we feel the second draft of COM-003 creates unnecessary or overly cumbersome requirements that add little or no value to reliability. The SDTs are coordinating issues to ensure there are no conflicts and that one SDT supports the requirements of the other.</p> <p>The SDT has modified the VRFs and VSLs to comply with approved NERC and FERC guidelines. In the second draft of the standard the SDT proposed a Medium VRF for each of the requirements. The SDT believes the new assignments more appropriately classify the VRFs and VSLs assigned to the Requirements in the second draft of COM-003-1.</p> <p>Recommendation 26 of the August 14, 2003 blackout report is cited as a driver for extending three-part communications. We believe the title of Recommendation 26 is misleading and when reviewed separately from the supporting text of the recommendation and direct and contributing factors in the report results in an</p>

Organization	Yes or No	Question 12 Comment
		<p>incorrect interpretation. “Failure to identify emergency conditions and communicate that status to neighboring systems” is one of the contributing factors and the supporting text of the recommendation clearly refer to shoring up communications during emergency and anticipated emergency conditions and establishing an emergency broadcast communication system to alert regulatory, state and local officials. The supporting text of Recommendation 26 only mentions addressing alerts, emergencies or other critical situations. Some have incorrectly inferred the initial clause of Recommendation 26, “Tighten communication protocols”, means the recommendation applies to all routine communications.</p> <p>The SDT cites additional “Recommendation 26 of the August 14, 2003 Blackout Report” text from the from the same section you are referencing:</p> <p>“On August 14, 2003, reliability coordinator and control area communications regarding conditions in northeastern Ohio were in some cases ineffective, unprofessional, and confusing. Ineffective communications contributed to a lack of situational awareness and precluded effective actions to prevent the cascade. Consistent application of effective communications protocols, particularly during alerts and emergencies, is essential to reliability. “</p> <p>There are several key points here:</p> <p>Clearly, ineffective, unprofessional, and confusing communications contributed to a lack of situational awareness and precluded effective actions to prevent the cascade.</p> <p>Note the context of this statement especially the word “particularly (“Consistent application of effective communications protocols, particularly during alerts and emergencies, is essential to reliability.”). It is apparent to the SDT that this means all communication should be subject to consistent, structured protocols. The use of “particularly” and “especially” (used in the Recommendation text) are used for emphasis only for alerts and emergencies and the intent is not to exclude other types of communications.</p> <p>The SDT believes the text of Recommendation 26 is very clear and is in no way misleading or confusing and that the Recommendation means exactly what it says: Tighten communications protocols, especially for communications during alerts and emergencies.</p> <p>Also please read FERC Order 693 paragraph 532 to review clarification on the application of three-part communications to routine directives. The SDT is working in accordance with the August 2003 Blackout Recommendation #26 and FERC Order 693 directives.</p>

Organization	Yes or No	Question 12 Comment
		<p>Lastly, this on-line submittal asks many questions that are YES/NO in nature (i.e. "do you have any concerns with...", or "if, yes, please explain...") but the radial selections are "agree/disagree" which may be taken out of context. We suggest changing the on-line submittal back to YES/NO.</p> <p>Finally the SDT will pass on your recommendation regarding changing the on line submittal to YES/NO.</p>
<p>Response: The SDT thanks you for your comments. Please see our responses above.</p>		
National Grid	Agree	<p>We believe that the existing standard COM-002 is actually better than this standard. This standard actually causes more confusion and ambiguity and creates unnecessary or overly cumbersome requirements that add little or no value to reliability. Additionally, we cannot understand how all requirements but R1 have been determined to have a HIGH VRF when, many of them are dictating HOW communications should take place and not when and why or what. COM-002 retirement does not appear to be consistent with the direction of the RC SDT. The RC SDT appears to be adding requirements. More coordination is required between these two teams.</p>
<p>Response: The SDT thanks you for your comments</p> <p>The SDT disagrees with you statement regarding COM-002 as a superior Standard. We do not see it as comparative nor do we feel the second draft of COM-003 creates unnecessary or overly cumbersome requirements that add little or no value to reliability.</p> <p>The SDT has modified the VRFs and VSLs to comply with approved NERC and FERC guidelines. The SDT believes the new assignments more accurately classify the VRFs and VSLs assigned to the Requirements in the second draft of COM-003-1.</p> <p>The SDT was chartered to develop Communication Protocols for Operating Personnel. The SDT proposes that the second draft of the standard is more focused on “what” protocols to use in specific situations.</p> <p>The SDT feels that the Requirements in the second draft of COM-003 are appropriate because they support the purpose identified in the SAR.</p> <p>The SDTs involved with COM standard development have been and are coordinating to ensure consistency, to avoid conflict and to avoid duplication.</p> <p>The implementation plan for COM-003 includes retirement of COM-002 to avoid duplication.</p>		
Dynergy	Agree	<p>We believe that the existing standard COM-002 is better than this proposed Standard. This Standard actually causes more confusion and ambiguity and creates unnecessary or overly cumbersome requirements that add little or no value to reliability. Additionally, we cannot understand how all requirements but R1 have been determined to have a HIGH VRF when, many of them are dictating HOW communications should take place and not when and why or what. The stated retirement of COM-002 does not appear to be consistent with the direction of the RC SDT in Project 2006-06. The RC SDT is adding requirements. More coordination is certainly</p>

Organization	Yes or No	Question 12 Comment
		<p>required between these two teams .In addition, as stated earlier, this Standard focuses on “how” certain tasks should be performed and conflicts with NERC’s position of pursuing performance based and results based Standards.</p>
<p>Response: The SDT thanks you for your comments</p> <p>The SDT disagrees with you statement regarding COM-002 as a superior Standard. We do not see it as comparative nor do we feel the second draft of COM-003 creates unnecessary or overly cumbersome requirements that add little or no value to reliability.</p> <p>The SDT has modified the VRFs and VSLs to comply with approved NERC and FERC guidelines. In the second draft of the standard the SDT proposed a Medium VRF for each of the requirements. The SDT believes the new assignments more accurately classify the VRFs and VSLs assigned to the Requirements in the second draft of COM-003-1.</p> <p>The SDT was chartered to develop Communication Protocols for Operating Personnel. The SDT proposes that the second draft of the standard is more focused on “what” protocols to use in specific situations.</p> <p>The SDT feels that the Requirements in the second draft of COM-003 are appropriate because they support the purpose identified in the SAR.</p> <p>The SDTs involved with COM standards development have been and are coordinating to ensure consistency, to avoid conflict and to avoid duplication. The implementation plan for COM-003 includes retirement of COM-002 to avoid duplication.</p> <p>The SDT does not believe its work to be inconsistent with results-based principles. The Need or Problem Statement for this standard is that miscommunication can lead to action or inaction harmful to the reliability of the BES. This was identified by the NERC President in his January 2011 report to the industry as one of the eight top priority issues for BPS reliability, and there are a number of events that have occurred in the past where miscommunication was a contributing factor to the event or exacerbated the severity of the event. The Goal, therefore, is to specify clear, formal and universally applied communication protocols that reduce the possibility of miscommunication. The key Objective to accomplish this Goal is to use communication protocols to reduce or correct misunderstandings. The requirements have been written to accomplish this Objective, and are risk-mitigating requirements (while operator performance is measured, the actions themselves are primarily designed to mitigate the risk of miscommunication that could lead to poor BES performance). We believe this standard is consistent with results-based principles, and it will improve the reliability of the BES.</p>		
Midwest ISO Standards Collaborators	Agree	<p>We believe that the existing standard COM-002 is better than this proposed Standard. This Standard actually causes more confusion and ambiguity and creates unnecessary or overly cumbersome requirements that add little or no value to reliability. Additionally, we cannot understand how all requirements but R1 have been determined to have a HIGH VRF when, many of them are dictating HOW communications should take place and not when and why or what. COM-002 retirement does not appear to be consistent with the direction of the RC</p>

Organization	Yes or No	Question 12 Comment
		<p>SDT in Project 2006-06. The RC SDT is adding requirements. More coordination is certainly required between these two teams</p> <p>.In addition, as stated earlier, this Standard focuses on “how” certain tasks should be performed and conflicts with NERC’s position of pursuing performance based and results based Standards. Based on these considerations, we suggest that work on this Standard be stopped until work on Project 2006-06 has been completed and approved.</p> <p>This approach is consistent with the August 2003 Blackout Recommendation #26 which actually focused on communications during emergencies which is the scope of Project 2006-06.</p> <p>The SDT was chartered to develop Communication Protocols for Operating Personnel. The SDT proposes that the second draft of the standard is more focused on “what” protocols to use in specific situations.</p> <p>The SDT does not believe its work to be inconsistent with results-based principles. The Need or Problem Statement for this standard is that miscommunication can lead to action or inaction harmful to the reliability of the BES. This was identified by the NERC President in his January 2011 report to the industry as one of the eight top priority issues for BPS reliability, and there are a number of events that have occurred in the past where miscommunication was a contributing factor to the event or exacerbated the severity of the event. The goal, therefore, is to specify clear, formal and universally applied communication protocols that reduce the possibility of miscommunication. The key objective to accomplish this goal is to use communication protocols to reduce or correct misunderstandings. The requirements have been written to accomplish this objective, and are risk-mitigating requirements (while operator performance is measured, the actions themselves are primarily designed to mitigate the risk of miscommunication that could lead to poor BES performance). We believe this standard is consistent with results-based principles, and it will improve the reliability of the BES.</p> <p>The SDT cites additional “Recommendation 26 of the August 14, 2003 Blackout Report” text from the from the same section you are referencing:</p> <p>“On August 14, 2003, reliability coordinator and control area communications regarding conditions in northeastern Ohio were in some cases ineffective, unprofessional, and confusing. Ineffective communications contributed to a lack of situational awareness and precluded effective actions to prevent the cascade. Consistent application of effective communications protocols, particularly during alerts and emergencies, is essential to reliability. “</p> <p>There are several key points here:</p>

Organization	Yes or No	Question 12 Comment
		<p>Clearly, ineffective, unprofessional, and confusing communications contributed to a lack of situational awareness and precluded effective actions to prevent the cascade.</p> <p>Note the context of this statement especially the word “particularly (“Consistent application of effective communications protocols, particularly during alerts and emergencies, is essential to reliability.”). It is apparent to the SDT that this means all communication should be subject to consistent, structured protocols. The use of “particularly” and “especially” (used in the Recommendation text) are used for emphasis only for alerts and emergencies and the intent is not to exclude other types of communications.</p> <p>The SDT believes the text of Recommendation 26 is very clear and is in no way misleading or confusing and that the Recommendation means exactly what it says: Tighten communications protocols, especially for communications during alerts and emergencies.</p> <p>Also please read FERC Order 693 paragraph 532 to review clarification on the application of three-part communications to routine directives. The SDT is working in accordance with the August 2003 Blackout Recommendation #26 and FERC Order 693 directives.</p> <p>After Project 2006-06 is completed, a determination can be made if this Standard is even required.</p> <p>The SDT respectfully disagrees with your statement that the team should stop work on COM-003-1 until project 2006-6 is complete. The implementation plan for COM-003 includes retirement of COM-002 to avoid duplication.</p>
<p>Response: The SDT thanks you for your comments. Please see our responses above.</p>		
PJM	Agree	<p>We have identified several problems with this standard, as noted above.</p> <p>Other observations include:</p> <p>The effective dates in the draft standard and in the implementation plan do not seem to match. In the standard, the effective date mentions one calendar year following regulatory approval, while the implementation plan refers to the third calendar quarter after regulatory approval.</p> <p>The SDT revised the standard and the implementation plan – and made the effective dates the same in both documents – the first day of the first calendar quarter six months after applicable approvals.</p> <p>Furthermore, we do not feel that any of the requirements in this standard warrant Violation Risk Factors or</p>

Organization	Yes or No	Question 12 Comment
		<p>Violation Severity Levels in the high or severe category. In summary, this review group feels that COM-003-1 is not yet ready to be acted upon and may have been posted too soon.</p> <p>The SDT has modified the VRFs and VSLs to comply with approved NERC and FERC guidelines. In the second draft of the standard the SDT proposed a Medium VRF for each of the requirements. The SDT believes the new assignments more accurately classify the VRFs and VSLs assigned to the Requirements in COM-003-1.</p> <p>There does not seem to be sufficient coordination between the drafting teams of all the COM standards, or any attempt to integrate these standards. One example is the inconsistency between COM-003-1 and COM-002-3 regarding the meaning of three-part communication (mentioned in our response to Question 1 above).</p> <p>he SDTs involved with COM standard development have been and are coordinating issues to ensure consistency, to avoid conflict and to avoid duplication. The implementation plan for COM-003 includes retirement of COM-002 to avoid duplication.</p> <p>Recommendation 26 of the August 14, 2003 blackout report is cited as a driver for extending three-part communications. We believe the title of Recommendation 26 is misleading and when reviewed separately from the supporting text of the recommendation and direct and contributing factors in the report results in an incorrect interpretation. “Failure to identify emergency conditions and communicate that status to neighboring systems” is one of the contributing factors and the supporting text of the recommendation clearly refer to shoring up communications during emergency and anticipated emergency conditions and establishing an emergency broadcast communication system to alert regulatory, state and local officials. The supporting text of Recommendation 26 only mentions addressing alerts, emergencies or other critical situations. Some have incorrectly inferred the initial clause of Recommendation 26, “Tighten communication protocols”, means the recommendation applies to all routine communications.</p> <p>The SDT cites additional “Recommendation 26 of the August 14, 2003 Blackout Report” text from the from the same section you are referencing:</p> <p>“On August 14, 2003, reliability coordinator and control area communications regarding conditions in northeastern Ohio were in some cases ineffective, unprofessional, and confusing. Ineffective communications contributed to a lack of situational awareness and precluded effective actions to prevent the cascade. Consistent application of effective communications protocols, particularly during alerts and emergencies, is</p>

Organization	Yes or No	Question 12 Comment
		<p>essential to reliability.”</p> <p>There are several key points here:</p> <p>Clearly, ineffective, unprofessional, and confusing communications contributed to a lack of situational awareness and precluded effective actions to prevent the cascade.</p> <p>Note the context of this statement especially the word “particularly” (“Consistent application of effective communications protocols, particularly during alerts and emergencies, is essential to reliability.”). It is apparent to the SDT that this means all communication should be subject to consistent, structured protocols. The use of “particularly” and “especially” (used in the Recommendation text) are used for emphasis only for alerts and emergencies and the intent is not to exclude other types of communications.</p> <p>The SDT believes the text of Recommendation 26 is very clear and is no way misleading or confused and that the Recommendation means exactly what it says: Tighten communications protocols, especially for communications during alerts and emergencies.</p> <p>Also please read FERC Order 693 paragraph 532 to review clarification on the application of three-part communications to routine directives. The SDT is working in accordance with the August 2003 Blackout Recommendation #26 and FERC Order 693 directives.</p> <p>As noted above, we feel that many of the requirements prescribe specific “how to” methods for compliance rather than focusing on the “what” of the requirement. Overall, COM-003-1 is much too prescriptive to be tied to million dollar-level fines</p> <p>The SDT was chartered to develop Communication Protocols for Operating Personnel. The SDT proposes that the second draft of the standard is more focused on “what” protocols to use in specific situations.</p>
<p>Response: The SDT thanks you for your comments. Please see our responses above.</p>		
PJM SOS Comments	Agree	<p>We have identified several problems with this standard, as noted above.</p> <p>Other observations include:</p> <p>The effective dates in the draft standard and in the implementation plan do not seem to match. In the standard, the effective date mentions one calendar year following regulatory approval, while the implementation plan refers to the third calendar quarter after regulatory approval.</p> <p>The SDT revised the standard and the implementation plan – and made the effective dates the same in both</p>

Organization	Yes or No	Question 12 Comment
		<p>documents – the first day of the first calendar quarter six months after applicable approvals.</p> <p>Furthermore, we do not feel that any of the requirements in this standard warrant Violation Risk Factors or Violation Severity Levels in the high or severe category.</p> <p>The SDT has modified the VRFs and VSLs to comply with approved NERC and FERC guidelines. In the second draft of the standard the SDT proposed a Medium VRF for each of the requirements. The SDT believes the new assignments more accurately classify the VRFs and VSLs assigned to the Requirements in the second draft of COM-003-1.</p> <p>In summary, this review group feels that COM-003-1 is not yet ready to be acted upon and may have been posted too soon. There does not seem to be sufficient coordination between the drafting teams of all the COM standards, or any attempt to integrate these standards. One example is the inconsistency between COM-003-1 and COM-002-3 regarding the meaning of three-part communication (mentioned in our response to Question 1 above).</p> <p>The SDTs involved with COM standard development have been and are coordinating issues to ensure consistency, to avoid conflict and to avoid duplication. The implementation plan for COM-003 includes retirement of COM-002 to avoid duplication.</p> <p>Recommendation 26 of the August 14, 2003 blackout report is cited as a driver for extending three-part communications. We believe the title of Recommendation 26 is misleading and when reviewed separately from the supporting text of the recommendation and direct and contributing factors in the report results in an incorrect interpretation. “Failure to identify emergency conditions and communicate that status to neighboring systems” is one of the contributing factors and the supporting text of the recommendation clearly refer to shoring up communications during emergency and anticipated emergency conditions and establishing an emergency broadcast communication system to alert regulatory, state and local officials. The supporting text of Recommendation 26 only mentions addressing alerts, emergencies or other critical situations. Some have incorrectly inferred the initial clause of Recommendation 26, “Tighten communication protocols”, means the recommendation applies to all routine communications.</p> <p>The SDT cites additional “Recommendation 26 of the August 14, 2003 Blackout Report” text from the from the</p>

Organization	Yes or No	Question 12 Comment
		<p>same section you are referencing:</p> <p>“On August 14, 2003, reliability coordinator and control area communications regarding conditions in northeastern Ohio were in some cases ineffective, unprofessional, and confusing. Ineffective communications contributed to a lack of situational awareness and precluded effective actions to prevent the cascade. Consistent application of effective communications protocols, particularly during alerts and emergencies, is essential to reliability.”</p> <p>There are several key points here:</p> <p>Clearly, ineffective, unprofessional, and confusing communications contributed to a lack of situational awareness and precluded effective actions to prevent the cascade.</p> <p>Note the context of this statement especially the word “particularly” (“Consistent application of effective communications protocols, particularly during alerts and emergencies, is essential to reliability.”). It is apparent to the SDT that this means all communication should be subject to consistent, structured protocols. The use of “particularly” and “especially” (used in the Recommendation text) are used for emphasis only for alerts and emergencies and the intent is not to exclude other types of communications.</p> <p>The SDT believes the text of Recommendation 26 is very clear and is no way misleading or confused and that the Recommendation means exactly what it says: Tighten communications protocols, especially for communications during alerts and emergencies.</p> <p>Also please read FERC Order 693 paragraph 532 to review clarification on the application of three-part communications to routine directives. The SDT is working in accordance with the August 2003 Blackout Recommendation #26 and FERC Order 693 directives.</p> <p>As noted above, we feel that many of the requirements prescribe specific “how to” methods for compliance rather than focusing on the “what” of the requirement. Overall, COM-003-1 is much too prescriptive to be tied to million dollar-level fines The SDT was chartered to develop Communication Protocols for Operating Personnel. The SDT proposes that the second draft of the standard is more focused on “what” protocols to use in specific situations.</p>
<p>Response: The SDT thanks you for your comments. Please see our responses above.</p>		
NRECA RTF		We recommend replacing the term “Distribution Service Providers” in Attachment 1 with the term “Distribution

Organization	Yes or No	Question 12 Comment
Members		<p>Provider” as stated in the Applicability of this standard. In addition, please see our response to Question 3 regarding a modification to the Applicability portion of the standard to address concerns about the inclusion of Distribution Providers and Load Serving Entities. We are concerned with the onerous communication requirements for Load Serving Entities and Distribution Providers with field personnel that have rare or possibly no opportunities to communicate with personnel working at an entity registered as a Transmission Operator, Transmission Owner, Balancing Authority, Reliability Coordinator, Generator Operator or Transmission Service Provider.</p>
<p>Response: The SDT thanks you for your comments. We agree with your recommendation on the term “Distribution Provider” and this change is reflected in the second draft of COM-003. We also note your comments on applicability in Question 3 and have provided our response there.</p>		
Transmission System Operations	Agree	<p>We think the SDT should coordinate their work closely with the team of the Reliability Coordination Project 2006-06, especially regarding new definitions related to communications and reliability directives.</p>
<p>Response: The SDT thanks you for your comments. The SDT agrees and the SDTs involved with COM standard development have been and are coordinating issues to ensure consistency, to avoid conflict and to avoid duplication.</p> <p>The SDT has revised the definitions to the proposed COM-003-1 Standard to define Operating Communication that should address your concerns over the applicability of three-part communications. The implementation plan for COM-003 includes retirement of COM-002 to avoid duplication.</p>		
Ameren		<p>We understand the binary function of VSL that forces Severe for most requirements. However, the standard itself seems to offer some hope with the definition to address the VSL issue better. The definition has at the end, “especially during alerts and emergencies” Given that this implies stratification, couldn’t Severe VSL be assigned to violations during emergencies, High be assigned to alerts, and moderate to all other system conditions. When emergency conditions exist, entities should have their “A” game on, and failure to communicate during these times is a more severe violation of the communication protocols than during the thousands of daily interactions that are not likely to affect BES, (alternatively, the VRF could be adjusted for the situation)</p>
<p>Response: The SDT thanks you for your comments</p> <p>The SDT has reviewed and modified the VRFs and VSLs to comply with approved NERC and FERC guidelines. The SDT believes the new assignments more accurately classify the VRFs and VSLs assigned to the Requirements in the second draft of COM-003-1. In the second draft of COM-003 the requirements are all assigned a “Medium” VRF – and the VSLs are more graduated.</p>		
MRO NERC Standards Review	Agree	<p>Without “Directive” being defined, this proposed standard still leaves a huge area that will cause problems and issues within the industry. We believe the SDT should replace “directive” with “Reliability Directive” and use the</p>

Organization	Yes or No	Question 12 Comment
Subcommittee		<p>definition developed in Project 20006-06: “A communication initiated by a Reliability Coordinator, Transmission Operator or Balancing Authority where action by the recipient is necessary to address an actual or expected Emergency.”</p> <p>COM 002 -3 and Reliability Directive are under development by the RC SDT. The term, “Reliability Directive” is not used in the second draft of COM-003.</p> <p>We believe Reliability Standard COM-003-1 is entirely too prescriptive, and is in actuality a procedure and not a standard. The Standard needs to focus on the “What” and not the “How”. If the industry is going to truly embrace the Results Based Standards Initiative, this standard must be significantly revised to reflect that philosophy.</p> <p>The SDT believes that the requirements in the second draft of COM 003 are appropriate because they support the purpose identified in the SAR. If you believe Reliability Standard COM-003-1 is entirely too prescriptive, and is in actuality a procedure and not a standard it should have been addressed in the SAR development process. The SDT was chartered to develop Communication Protocols for Operating Personnel. The SDT proposes that the second draft of the standard is more focused on “what” protocols to use in specific situations.</p> <p>The SDT does not believe its work to be inconsistent with results-based principles. The Need or Problem Statement for this standard is that miscommunication can lead to action or inaction harmful to the reliability of the BES. This was identified by the NERC President in his January 2011 report to the industry as one of the eight top priority issues for BPS reliability, and there are a number of events that have occurred in the past where miscommunication was a contributing factor to the event or exacerbated the severity of the event. The Goal, therefore, is to specify clear, formal and universally applied communication protocols that reduce the possibility of miscommunication. The key Objective to accomplish this Goal is to use communication protocols to reduce or correct misunderstandings. The requirements have been written to accomplish this Objective, and are risk-mitigating requirements (while operator performance is measured, the actions themselves are primarily designed to mitigate the risk of miscommunication that could lead to poor BES performance). We believe this standard is consistent with results-based principles, and it will improve the reliability of the BES.</p> <p>We believe that the existing standard COM-002 is actually better than this standard. This standard actually</p>

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		<p>causes more confusion and ambiguity and creates unnecessary or overly cumbersome requirements that add little or no value to reliability.</p> <p>The SDT respectfully disagrees with your statement that “COM-002 is actually better than this standard and this standard actually causes more confusion and ambiguity and creates unnecessary or overly cumbersome requirements that add little or no value to reliability.” COM 002-2 is too vague and has left much doubt in the stakeholders’ minds. The SDT believes COM 003 adds clarity to the communication standards.</p>
<p>Response: The SDT thanks you for your comments. Please see our responses above.</p>		
PSEG Companies	Agree	<p>Yes. The PSEG Companies agree with the concerns expressed in the comments filed by the PJM System Operations Subcommittee (SOS) Group.</p>
<p>Response: The SDT thanks you for your. Please see our response to the comments from filed by the PJM System Operations Subcommittee (SOS) Group.</p>		