

## Frequently Asked Questions – Addendum

### COM-003, Draft 5

This document is being provided to assist commenters' understanding of COM-003-1, draft 5 based on inquiries received by the drafting team and the Standards Committee.

1. How would you differentiate between slips of the tongue and “deficient communication practices” without involving subjective judgments? The same is true for attempting to identify changes in an operator’s degree of understanding, especially when doing so through the numbing process of making before-and-after voice recordings comparisons.

**Response:** The criteria for System Operator/operator performance should be established by the applicable entity. The Operating Personnel Communications Protocols Standard Drafting Team (OPCPSDT) believes it is the discretion of the applicable entity to set its expectations of its operating personnel with regard to communication protocols and then to monitor and if necessary improve their performance. There will be less subjective judgment if the entity develops strong communication protocols and structured programs to evaluate and improve System Operator/operator performance. The OPCPSDT acknowledges there are many forms of programs and methods an entity might employ to accomplish this, but it does not want to dictate a one size fits all process.

2. If the goal is to have strong internal controls where the detective control of periodically sampling conversations allows the Generator Operator (GOP) to detect and correct communications, why would the GOP need documentation other than to note they found nothing, or to note they found one issue and made the operator retake training?

**Response:** If the entity, in this case a GOP, during the audit period, found nothing or they found one issue and made the operator retake training, the documentation supporting those circumstances would suffice. M4 only asks for “*the results of its periodic assessment and of any corrective actions (if any corrective actions were implemented)*”.

3. Does R4 leave GOPs open to the auditor’s interpretation of the sufficiency of the corrective program? Or is it intended that GOP and Distribution Provider (DP) have the authority to develop their own programs without the risk an audit will find it insufficient.

**Response:** The OPCPSDT intended that entities develop their own programs that support the requirements of COM-003-1. There are many methods available to entities to accomplish this and the OPCPSDT does not want to dictate a one size fits all approach to monitoring and improving operator communication protocol performance. M4 only asks for “*the results of its periodic assessment and of any corrective actions (if any corrective actions were implemented)*” The important focus are the results of its periodic assessment and of any corrective actions. The OPCPSDT believes entities will develop or already possess evaluation and training programs and

would advocate for improving operator communication protocol performance on the Bulk Electric System (BES) based on the desire to avoid communication mishaps.

4. The Reliability Standard Audit Worksheet requires the GOP to turn over records of monitoring communications (which is a large compliance burden, especially for smaller entities) as well as records of corrective actions and then proof the “problem” is not still in place. Turn over records to whom? How many records? How do you prove it has stopped? Where does the paperwork stop?

**Response:** The records are to be provided to the CEA for review and verification. The CEA needs to review and understand the entity’s monitoring program(s) and to review the instances where corrective action was warranted. The CEA should expect to see evidence needed to be assured that the assessment and corrective program exists and is being implemented. Such evidence could consist of review logs noting the communications that were reviewed (e.g. date, time, and reviewer) and descriptions and evidence of the corrective actions take, if any. The entity should establish its own measure of effectiveness to determine if an operator meets the entity’s expectations. This makes it less murky for the CEA and reduces subjectivity.

5. Who determines the GOP and DP personnel who are subject to R3 and R4? Are the GOP personnel those in a control room in the plant? For a DP are they distribution dispatches? Is there a way to clarify who the Standard is applicable to?

**Response:** The criteria for which GOP and DP personnel subject to R3 and R4 of COM-003-1 would be an operator who would receive either a:

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

*Reliability Directive: A communication initiated by a Reliability Coordinator, Transmission Operator, or Balancing Authority where action by the recipient is necessary to address an Emergency or Adverse Reliability Impact.*

**Response part two:** Distribution system dispatches by a DP would not be applicable. COM-003-1 is applicable to BES communications as defined by Operating Instructions and Reliability Directives. The OPCPTSDT would encourage communication protocols for verbal switching on the distribution system because they improve reliability.

6. How can three-way communication be used for “a one-way burst messaging system to communicate a common message to multiple parties in a short time period (e.g. an All Call system)” -- to those on the receiving end, it does not seem possible under the current technology used for these oral messaging systems to have three way. Please explain how three-way can be used for one way burst messaging systems?

**Response:** The Standard *does not require three part communication for “a one-way burst messaging system to communicate a common message to multiple parties in a short time period (e.g. an All Call system)”* because obtaining a response from all of the multiple receivers would create considerable delays and potential confusion defeating the speed and efficiency an all call type of message provides.

R1 Part 1.8 and R3 Part 3.3 require the receiver of an oral Operating Instruction or Reliability Directive using an all call system to request clarification from the initiator if the communication is not understood, if required by the issuer.

7. It appears consistent with Order 743 and FERC’s ruling that only generator dispatch operators be trained on implementing directives and instructions to also limit COM-003 to FERC’s ruling in Order 743, which would apply COM-003 generation dispatchers who (at a centrally-located generation dispatch center or at a dispatch center at the same site as a single generation plant) either:
  - a. Receive direction and then develop specific dispatch instructions for plant operators under their control or
  - b. Determine the best way to deliver that generation from its portfolio of units. Was this the intent of COM-003 to be consistent with Order No. 743 and the work on PER-005?

**Response:** COM-003-1 is compliant with the FERC’s ruling in Oder 743. The standard is clear that generator operators that receive or will receive Operating Instructions and Reliability Directives from a Balancing Authority, Reliability Coordinator or Transmission Operator are applicable entities and must be compliant.

The issue of how communication protocols are established and managed within the GOP’s organization can be addressed within the scope of the entity’s documented communication protocols. The GOP is encouraged to make them uniform to prevent confusion within its organization.

8. The latest version of COM-003-1 appears to introduce a potential conflict with COM-002-3 related to use of one-way burst messaging systems to issue a Reliability Directive. In other words, COM-003-1 allows one-way burst messaging to be used for Reliability Directives and prescribes:
  - a. issuer to confirm receipt from at least one receiving party
  - b. receiver to request clarification from the issuer if the communication is not understood

However, COM-002-3 has the following requirements:

R2. Each Balancing Authority, Transmission Operator, Generator Operator, and Distribution Provider that is the recipient of a Reliability Directive shall repeat, restate, rephrase, or recapitulate the Reliability Directive.

R3. Each Reliability Coordinator, Transmission Operator, and Balancing Authority that issues a Reliability Directive shall either:

- a. Confirm that the response from the recipient of the Reliability Directive (in accordance with Requirement R2) was accurate, or

b. Reissue the Reliability Directive to resolve a misunderstanding.

In other words, in the case of a one-way burst messaging used for Reliability Directives, COM-002-3 does not appear to allow for only those responses required in COM-003-1 but instead requires a full 3 way communication from all parties. This potentially sets up both the issuer and receiver for violating COM-002-3 if they respond to a one-way burst messaging Reliability Directive as the requirements indicate in COM-003-1. In order to be fully compliant with both standards, the receiver would have to contact the issuer, repeat what was said on the original burst message, and then the issuer would confirm that the response was accurate before acting on the message. Is this correct?

**Response:** The COM-002 team addressed the Reliability Directive “all call” issue in the consideration of comments for COM-002-3, found on the project page:

[http://www.nerc.com/filez/standards/Reliability\\_Coordination\\_Project\\_2006-6.html](http://www.nerc.com/filez/standards/Reliability_Coordination_Project_2006-6.html)

The COM-002-3 drafting team envisioned that Reliability Directives could/would be issued using “blast call”/“all call” capability. They also clearly tied their response to COM-003-1, saying that Project 2007-02 would resolve the issue. The current draft of COM-003-1 resolves the issue by allowing entities to create a procedure to allow flexibility on how this will be achieved. The procedure must require an issuer of a “blast call”/“all call” to confirm receipt from at least one receiving party (R1.7) and for the receiver to request clarification from the issuer if the communication is not understood (R1.8). The consideration of comments will be filed with COM-002-3 and will become part of the development record of COM-002-3, and as such can be referenced by entities for their compliance in COM-002-3 and COM-003-1. For COM-003-1 to not cover “all call” scenarios for Reliability Directives would leave a gap for entities in compliance with COM-002-3.

For draft 5 of COM-002-3, the following comment and response was provided:

**Comment:** *The Standard is not clear as to what each entity is to do when more than one entity receives a Reliability Directive at the same time (e.g. during a RC area teleconference call). Is, for example, a roll call of receiving entities expected to be held so that they individually can repeat, restate, rephrase or recapitulate the Reliability Directive followed by individual confirmation required in R3?*

**Response:** The question about whether a roll call of receiving entities is expected to be held is asking for prescription of “how” to accomplish what is required. The RCSDT recognizes that there is more than one way to accomplish the confirmation when more than one entity received a Reliability Directive at the same time. What is required is for the recipient to respond in such a way that the issuer may determine whether the message has been properly understood. One way for that to occur would be, as you suggest, for the entities to individually respond. Another way would be for a pre-established protocol or procedure (e.g. roll-call, all-call, etc.) to be in place and used in such cases. The RCSDT has determined that prescribing “how” to ensure that “what” is required has been accomplished is not required and that the individually adopted procedures or protocols could offer many different ways to ensure effectiveness. No change made. The RCSDT concept is

that “All Call” compliance is related to having a document that explains how the entity responds. No change made.

[http://www.nerc.com/docs/standards/sar/Project\\_2006\\_06\\_Response\\_to\\_Comments\\_2012\\_06\\_12.pdf](http://www.nerc.com/docs/standards/sar/Project_2006_06_Response_to_Comments_2012_06_12.pdf) (page 173)

For draft 4 of COM-002-3, the following comments and responses were provided:

**Comment:** *Requirements for using three-part communication: It is our opinion that the standard needs language that clearly states that during a Blast Call three-part communication is not required. Blast Calls are used when information needs to be disseminated quickly to a large number of entities. Strictly enforcing the use of three-part communication under these circumstances has the potential to be more harmful to reliability than helpful.*

**Response:** The RCSDT agrees that the use of Blast Calls to issue Reliability Directives, in mass, is efficient and effective. The RCSDT believes Reliability Directives issued in mass should be defined by procedure, and that the procedure would establish a method of affirmation and notice of implementation. As envisioned, communications protocols would be addressed in the COM-003 standard being developed in Project 2007-02.

[http://www.nerc.com/docs/standards/sar/Consideration\\_of\\_Comments\\_Initial\\_Ballot\\_2006-06\\_071411.pdf](http://www.nerc.com/docs/standards/sar/Consideration_of_Comments_Initial_Ballot_2006-06_071411.pdf) (page 44)

**Comment:** *We also are concerned about the need to conduct three-part communications for a Reliability Directive issued through a blast call. Under these circumstances, the need for immediate action of multiple parties may require a blast call and there may not be time for all parties to complete three-part communications before initiating actions. Thus, we believe blast calls should be treated separately and that should be made clear.*

**Response:** The RCSDT agrees that the use of Blast Calls to issue Reliability Directives, in mass, is efficient and effective. However the essence of accurately implementing Reliability Directives is accomplished by use of 3-part communications. The RCSDT believes Reliability Directives issued in mass should be defined by procedure, and that the procedure would establish a method of affirmation and notice of implementation. As envisioned, communications protocols requiring for issuing alerts will be addressed in the COM-003 standard being developed in Project 2007-02.

[http://www.nerc.com/docs/standards/sar/Consideration\\_of\\_Comments\\_Initial\\_Ballot\\_2006-06\\_071411.pdf](http://www.nerc.com/docs/standards/sar/Consideration_of_Comments_Initial_Ballot_2006-06_071411.pdf) (page 56)