

Frequently Asked Questions

July 2, 2013 Industry Webinar COM-003-1, Draft 6

Operating Instructions

Q: Operating Instructions apply only to BES elements by the definition provided. Do you expect that DPs that do not own or operate BES elements to receive Operating Instructions? If so, please give an example.

A: Yes, an example could be load redistribution through switching in order to alleviate a BES element overload.

Q: EVERY Operating Instruction will need to be evaluated. *"shall provide evidence that it did not issue an Operating Instruction that resulted in an operating condition that required the issuance of a Reliability Directive"* Please explain how this is not a compliance burden.

A: There is no intention to evaluate every Operating Instruction. The only Operating Instructions that will be evaluated, will be those surrounding an event that led to the issuance of a Reliability Directive during the audit period. These Operating Instructions will then be used to confirm or refute if the misuse of a protocol contributed toward the event in question. If a Reliability Directive was not issued during the audit period, an attestation to that effect from the cognizant RC will demonstrate evidence of compliance.

Requirement 1: Develop documented communication protocols

Q: In requirement R1, does an entity need annual approval from RC for entity's documented communication protocol? What is the frequency of RC approval?

A: The OPCSDT believes that is best determined by the RC and its participating entities. There are no requirements in COM-003-1 specifying the frequency of approval.

Q: Since the GOP and DP will have no knowledge of the requirement R1 communication protocols, there should be a Requirement that the BA, RC and TOP shall provide training for the communication protocols to each GOP and DP so they can use them correctly.

A: There is no requirement for the BA, RC and TOP to provide training for the communication protocols to each GOP and DP so they can use the protocols correctly, but nothing in the requirements precludes training and formal dissemination of protocols. It should be noted that the actions required of a GOP and DP are very similar in nature to those required in COM-002-3.

Q: Does requirement R1 require each BA and TOP to develop their own proposed communication protocols that must be approved by the RC or does it require all the BAs and all the TOPs to work together with the RC to develop a single communications protocol that must be approved by the RC for use by all entities in the RC area?

A: Either option is suitable as long as the RC approves it. The SDT encourages working together to promote uniformity.

Q: How do we get the RC's approval of our protocols? What evidence of approval will the RC give us? Could you explain the rationale of having the RC approve the communications protocol between the BA and TOP functions?

A: The OPCPSDT believes the RC is the best entity to specify and encourage other entities to develop uniform communication protocols. The SDT does not want to dictate how this will be done. We would rather rely on the entities involved to work collaboratively to strengthen reliability. We believe the RCs are capable of determining the communication needs of their operating control areas. An example of a similar concept can be found in EOP-006-2 R5 and R5.1.

Q: Why is there no requirement for the documented communication protocols to be provided to the GOPs and DPs?

A: The SDT believes the DPs' and GOPs' limited roles do not warrant a specific requirement for distribution of the communication protocols. The SDT supports providing the protocols and providing training as a way of reducing the risks associated with miscommunication.

Requirement 2 – Issuers of Operating Instructions

Q: Requirements R2 and R3 appear to cover much the same functional area. Is there a reason requirement R2 is not applicable to DPs and GOPs entities? They are applicable to requirement R3.

A: Requirement R3 is applicable to DPs and GOPs that will receive Operating Instructions. BAs and TOPs may receive Operating Instructions as well. Requirement R2 is applicable to issuers of Operating Instructions. DPs and GOPs do not issue Operating Instructions, so R2 is not applicable to them.

Q: If a DP will not be expected to carry out an Operating Instruction that impacts the BES, since they are not operators of the BES, please explain how R2 in COM-003 applies.

A: R2 does not apply to DPs (or GOPs); R3 does apply to each. All a DP or GOP has to do, as required in R3, is repeat, restate, rephrase or recapitulate the Operating Instruction, when required by the issuer.

Requirement 3 – Receivers of Operating Instructions

Q: How can a GOP or a DP be held accountable for issuance of an RD (Reliability Directive) when they fail to repeat, restate, etc. when they don't have a wide-area view of the transmission system?

A: A wide-area view of the transmission system is not necessary for compliance with requirement R3. RCs, BAs, and TOPs are the entities issuing the Operating Instructions or Reliability Directives. Requirement R3 simply requires the BA, TOP, DP, or GOP to repeat, restate, rephrase or recapitulate the Operating Instruction when required by the issuer.

Q: The second part of requirement R3 seems to state that if a GOP does not repeat, restate, rephrase or recapitulate and an RD (Reliability Directive) is issued the GOP has failed to comply. Is that true?

A: That is correct-if the lack of the repeat back contributed to the issuance of the Reliability Directive.

Q: Why was the RC left out of the first part of requirement R3?

A: The RC would never be issued an Operating Instruction and should not be in a position to have to repeat, restate, rephrase or recapitulate. RC to RC communications are addressed in IRO-014-2.

Q: Requirement R1 does not list the GO as an applicable entity, yet R3 makes reference to R1. To clarify, the GO does not have to develop communication protocols but simply must comply with operating instructions given to them and shall restate, rephrase, recapitulate an Operating Instruction when required by the issuer?, correct?

A: That is correct, the GOP must restate, rephrase, and recapitulate an Operating Instruction when required by the issuer. Complying with or executing the Operating Instructions is addressed in other standards.

Q: The terms Transmission interface Elements and Transmission interface Facilities are not defined. How will the GOP and DP know which equipment is intended?

A: Transmission, Elements and Facilities are all defined terms. The issuing entity will specify the equipment or assets to be operated.

Q: Does requirement R3 mean that if a GOP fails to use 3-part communications when responding to an Operating Instruction, but this failure does not result in a Reliability Directive, then the GOP is still in compliance with requirement R3?

A: That is correct.

Compliance

Q: If a (Reliability) Directive is issued, is it (the entity) expected to perform a self-audit to determine if COM-3 was followed?

A: There is not a requirement to perform a self-audit to determine if COM-3 was followed, but doing so would permit an entity to identify any potential self-reports and or corrective actions.

Q: What prevents a compliance issue where execution of an Operating Instruction doesn't happen in a timely manner and then results in Reliability Directive?

A: The OPCSDT believes what you are describing is an execution error due to a cause other than the use of communication protocols. That could be subject to another standard's requirements.

Q: If a (Reliability) Directive is issued, how far back would the auditor look to determine whether any Operating Instruction was issued and not followed (or repeated)? I.e. - Wrong BES element switched that didn't lead to Directive until next day?

A: If a Reliability Directive is issued because of an Adverse Reliability Impact or an Emergency, the entities involved should keep all evidence that would determine the cause. Using this logic, the SDT recommends keeping all evidence that would refute or confirm that a COM-003-1 violation caused the issuance of the Reliability Directive no matter what the time separation.

Q: Can you please provide insight into what evidence might look like for R2 & R3?

A: Evidence can include but is not limited to recordings, log entries, event investigations, attestations, documented observation.

Q: If an entity fails to implement its communication protocol, yet this failure does NOT result in a condition that causes issuance of a Reliability Directive, is the entity in violation of the standard?

A: No, it is not a violation.

Q: To clarify, the only way to violate R2 or R3 is if an Operating Instruction is not followed and a Reliability Directive is required?

A: If the communication protocol, developed in R1, is not used or is misused and directly causes or contributes to the issuance of a Reliability Directive such that there would be a finding of non compliance with COM-003-1.

Q: If an RC, TOP, and/or BA has not issued any Reliability Directives during a compliance period, how would CEAs audit that case? Would they review a random sampling of voice recordings? Would self-attestations stating no RDs issued be enough evidence or would CEAs be looking to see LOAs from all the BA, TOP, DP, and GOPs that could have received an RD from the RC, TOP, and BA?

A: If no Reliability Directives were issued during the audit period and attested to by the RC, BA or TOP that would issue a Reliability Directive to the entity undergoing the audit, then there would be no further action required for requirements R2 and R3.

Q: Measurements M2/M3 - a protocol is established per requirement R1; however one operator fails to comply resulting in a RD to be issued, is that a violation?

A: Yes it is a violation.