

## Table of Issues and Directives

Project 2007-02

Operating Personnel Communications Protocols

Table of Issues and Directives Associated with COM-002-4

Source	Directive Language	Disposition	Section and/or Requirement(s)
FERC Order No. 693, P 512, 513, 540 (Part1)	512. The Commission finds that, during both normal and emergency operations, it is essential that the transmission operator, balancing authority and reliability coordinator have communications with distribution providers. In response to APPA, as discussed above, any distribution provider that is not a user, owner or operator of the Bulk-Power System would not be required to comply with COM-002-2, even though the Commission is requiring the ERO to modify the Reliability Standard to include distribution providers as applicable entities. APPA's concern that 2,000 public power systems would have to be added to the compliance registry is misplaced, since, as we explain in our Applicability discussion above, we are approving NERC's registry process, including the registry criteria. Therefore, we adopt our proposal to require	Distribution Providers have been included as applicable entities in COM-002-4	Applicability 4.1.2 Requirements R2, R4, R5.

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	<p>the ERO to modify COM-002-2 to apply to distribution providers through its Reliability Standards development process.</p> <p>513. The Commission believes that this Reliability Standard does not alter who would operate a distribution provider’s system. It only concerns communications, not the operation of the distribution system.</p> <p>540. ... In addition, pursuant to section 215(d)(5) of the FPA and § 39.5(f) of our regulations, the Commission directs the ERO to develop a modification to COM-002-2 through the Reliability Standards development process that: (1) expands the applicability to include distribution providers as applicable entities; (2) includes a new Requirement for the reliability coordinator to assess and approve actions that have impacts beyond the area view of a transmission operator or balancing authority and (3) requires tightened communications protocols, especially for communications during alerts and emergencies. Alternatively, with respect to this final issue, the ERO may</p>		

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	<p>develop a new Reliability Standard that responds to Blackout Report Recommendation No. 26 in the manner described above. Finally, we direct the ERO to include APPA's suggestions to complete the Measures and Levels of Non-Compliance in its modification of COM-002-2 through the Reliability Standards development process.</p>		
<p>FERC Order No. 693, P 531, 534, 535, 540 (Part 3)</p>	<p>531. We adopt our proposal to require the ERO to establish tightened communication protocols, especially for communications during alerts and emergencies, either as part of COM-002-2 or as a new Reliability Standard. We note that the ERO's response to the Staff Preliminary Assessment supports the need to develop additional Reliability Standards addressing consistent communications protocols among personnel responsible for the reliability of the Bulk-Power System.</p> <p>534. In response to MISO's contention that Blackout Report Recommendation No. 26 has been fully implemented, we note that</p>	<p>COM-002-4 tightens protocols for Operating Instructions, which cover necessary non-emergency communications and communications that are Reliability Directives. Reliability Directives include both alert and emergency communications.</p>	<p>Definition of Operating Instruction Requirements R1, R2, R3, R4, R5</p>

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	<p>Recommendation No. 26 addressed two matters. We believe MISO is referring to the second part of the recommendation requiring NERC to “[u]pgrade communication system hardware where appropriate” instead of tightening communications protocols. While we commend the ERO for taking appropriate action in upgrading its NERCNet, we remind the industry to continue their efforts in addressing the first part of Blackout Recommendation No. 26. (Emphasis added)</p> <p>535. Accordingly, we direct the ERO to either modify COM-002-2 or develop a new Reliability Standard that requires tightened communications protocols, especially for communications during alerts and emergencies.</p>		
<p>FERC Order No. 693, P 532</p>	<p>532. While we agree with EEI that EOP-001-0, Requirement R4.1 requires communications protocols to be used during emergencies, we believe, and the ERO agrees, that the communications protocols need to be</p>	<p>Reliability Standard EOP-001-2.1b — Emergency Operations Planning (successor standard to EOP-001-0) requires that the emergency plans for each Transmission Operator and Balancing Authority include:</p>	<p>Requirements R1, R3, R5</p>

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	<p>tightened to ensure Reliable Operation of the Bulk-Power System. We also believe an integral component in tightening the protocols is to establish communication uniformity as much as practical on a continent-wide basis. This will eliminate possible ambiguities in communications during normal, alert and emergency conditions. This is important because the Bulk- Power System is so tightly interconnected that system impacts often cross several operating entities' areas.</p> <p>533. Regarding APPA's suggestion that it may be beneficial to include communication protocols in the relevant Reliability Standard that governs those types of emergencies, we direct that it be addressed in the Reliability Standards development process.</p>	<p>communications protocols to be used during emergencies (Requirement R3.1). This requirement is compatible with COM-002-4, which establishes the communications protocols and requires their use.</p> <p>COM-002-4 requires a set of protocols be used by all applicable entities, establishing communication uniformity as much as practical on a continent-wide basis</p>	

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<p>FERC Order No. 693, P 514, 515</p>	<p>514. APPA notes that the Levels of Non-Compliance for COM-002-2 are inadequate in two respects: (1) reliability coordinators are not included in any Level of Non-Compliance and (2) the Levels of Non-Compliance for transmission operators and balancing authorities in Compliance D.2 do not reference Requirements R1 and R2. Therefore, APPA would support approval of COM-002-2 as a mandatory Reliability Standard, but would not support levying penalties for violating incomplete portions of the Reliability Standard.</p> <p>515. As stated in the Common Issues section, a Reliability Standard is enforceable even if it does not contain Levels of Non-Compliance. However, the Commission agrees with APPA that this Reliability Standard could be improved by incorporating the changes proposed by APPA. Therefore, when reviewing the Reliability Standard through the Reliability Standards development process, the ERO should consider</p>	<p>COM-002-4 includes Measures, VRFs and VSLs for each requirement.</p>	<p>Section C, Measures Section D, Compliance</p>

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	APPA’s concerns.		
2003 Blackout Report Recommendation No. 26	NERC should work with reliability coordinators and control area operators to improve the effectiveness of internal and external communications during alerts, emergencies, or other critical situations, and ensure that all key parties, including state and local officials, receive timely and accurate information. NERC should task the regional councils to work together to develop communications protocols by December 31, 2004, and to assess and report on the adequacy of emergency communications systems within their regions against the protocols by that date.	The requirements in COM-002-4 will improve the effectiveness of internal and external communications during alerts, emergencies, and other critical situations.	Requirements R1, R2, R3, R4, R5