

September 6, 2013

Fred Gorbet, Chair
NERC Board of Trustees

Gerry Cauley, President and CEO
NERC

Gentlemen,

At the August 2013 Board of Trustees meeting, the Reliability Issues Steering Committee (RISC) was asked by the Board to provide answers to a series of questions related to Operating Personnel Communication Protocols – COM-003-1. The RISC provides the responses below.

Please reach out to me if you have any questions or concerns.

Sincerely,

Chris Schwab

Chair, Reliability Issues Steering Committee

cc: RISC Members

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**RISC Response to Questions from the
August 15, 2013, NERC Board of Trustees Resolution regarding
Operating Personnel Communication Protocols – COM-003-1**

Question 1.

Proposed COM-002-3 Reliability Standard provides a standard that addresses communication protocols in an emergency. Are there circumstances that are not an emergency (as defined in COM-002-3) that can lead to reliability risks if not appropriately addressed by a standard? If so, what are these circumstances and how important is it that there be a standard to address them?

Response:

Yes, there is a category of non-emergency circumstances that could possibly lead to a reliability risk. Some such circumstances could include the switching of bulk electric system facilities (e.g., capacitor banks, etc.), manual ramp-up or ramp-down of generation, and oral alerts. However, the RISC believes that such categorization should be defined by the Operating Committee, as they have the greatest amount of experience and knowledge in this area.

In the ten years since the 2003 Northeast Blackout, much progress has been made in the area of communications. The “Arizona-Southern California Outages on September 8, 2011” report cited 27 causes and recommendations; ineffective or confusing non-emergency communications was not listed as a cause. Similarly, the “Report on Outages and Curtailments During the Southwest Cold Weather Event of February 1-5, 2011” listed 26 Key Findings and Recommendations for the electric industry, none of which included ineffective or confusing non-emergency communications.

Additionally, it appears that NERC event analysis data has not yielded evidence of a reliability gap regarding non-emergency communication as a contributing factor to bulk electric system events.

The RISC suggests that the Operating Committee should be tasked with defining the non-emergency circumstances that can lead to a reliability risk that threatens the BES. This activity should be based on review of available data and the application of the expertise and knowledge of the Operating Committee.

While the RISC recognizes there is limited empirical data indicating that communication errors in non-emergency situations have led to reliability problems, the RISC believes a standard will be developed in response to this concern. The RISC believes it is critical that the standard be developed based on the risk to reliability associated with whatever special circumstances are identified.

Question 2.

Does the latest draft of the COM-003-1 Reliability Standard address such circumstances appropriately? Is it a “quality standard” on the basis of the criteria that are being used to assess existing and future standards by the Independent Experts Panel?

Response:

The COM-003-1 standard does address such circumstances, but may not do so at an appropriate level of prescription, and does not represent a quality standard.

Any standard that is developed should include requirements that are results-based, minimize disruptive administrative requirements, and be complementary to any other methods used for addressing system operator communication.

Question 3.

Are there changes you would recommend to improve the current draft of the COM-003-1 Reliability Standard? Describe how the enhancements would address any gaps in bulk-power system reliability.

Response:

Please see our answer to question 5.

Question 4.

Should the proposed COM-002-3 Reliability Standard approved by the Board be rescinded and a new standard developed that addresses communications during both emergency and non-emergency conditions? If so, what key issues would it address, including an appropriate definition of “non-emergency conditions”?

Response:

The RISC does not recommend the Board rescind its approval of the proposed COM-002-3. The RISC does recommend the immediate filing of the COM-002-3 standard, as well as the COM-002-2 Interpretation, since both will improve reliability of the BES. As work on COM-003-1 progresses, it is critical that it be complementary to COM-002-3, and that there are clear delineations between emergency and non-emergency communications and the associated obligations created by the standard.

Question 5.

Do you have any additional input regarding the development of the COM-003-1 Reliability Standard for the Board to consider in its deliberations on next steps?

Response:

The RISC offers the following guiding principles in the development of a COM-003-1 standard:

- A risk-informed process should be used to define a risk-based standard. The standard should be drafted based on expert opinion and data to recognize the differing risks of the categories defined by the OC in which a failure to communicate clearly during non-emergency circumstances could possibly lead to a threat to the BES.
 - For those categories that present the greater risk, it is appropriate to be more prescriptive and more uniform within and across regions and reliability coordination areas.
 - For those categories that present less risk, it is appropriate to allow more flexibility.
- The enforcement regime for such a standard cannot be zero-tolerance. Focus should be on the quality of an entity's communication protocols, the quality of their associated training, and how the entity ensures their protocols are followed.
- There must be clear delineations between emergency and non-emergency communications and the associated obligations created by the standards.
- The standard should not address protocols for electronic pulsing for Automatic Generation Control or electronically delivered alerts.