

Industry Webinar – Remaining Q & A Project 2007-02 Operating Personnel Communications Protocols Standard Drafting Team (COM-003-1)

June 7, 2012

Q: The meaning of Operating Communication keys on the meaning of the word "instruction". Can the SDT clarify the meaning of this word and examples of it?

A: The term instruction is used in the context of the word "order" as to order an individual to complete a task for example: *I instructed him to get rid of the trash.*

Q: I'll ask a silly question: how would the COM-003 audit question? Take for example "Will you please open breaker apha-bravo-charlie-one-two-three?"

A: I'm not sure of the context you intend for "Will you please open breaker apha-bravo-charlie-one-two-three?" If it is a question as you indicate by the punctuation it should not be construed as an Operating Communication which would instruct or order an individual. It seems as though the speaker is asking the receiver for permission to *open breaker alpha-bravo-charlie-one-two-three*. If the intent of the speaker was to command the receiver to open the breaker it should be a direct statement of command not an interrogative statement.

Q: You commented that these standards are not intended to apply to distribution systems outside the BES. Why do these versions create requirements for Distribution Providers who do not operate the BES ?

A: The SDT believes the standard applies to Distribution Providers under some circumstances such as instructions to shed load. When DPs are involved with Operating Communications they must be compliant with R1 and R3 of COM-003-1.

Q: COM-003-01: 1.2. When participating in oral Operating Communications and using alpha-numeric identifiers, use accurate alpha-numeric clarifiers.1 -- states "and using alpha-numeric identifiers." Does that give me an out not to use it?

A: No, if the nomenclature of an Element or a Facility includes designators that are alphanumeric identifiers the entity must use alpha-numeric clarifiers to ensure the desired actions are being performed on the proper Element or Facility.

Q: What is the exact role of Generator Operator in this standard? What is the different role between TO and GO? Could TO acting as GO in a utility in this standard? Do you really need GO in this standard?

A: The GO is the Generator Owner and is not an applicable entity in COM-003-1. We are certain you mean the GOP or Generator Operator. The GOP is subject to R1 and R3. R1 requires that when entities are engaged in Operating Communications they will use the Communication Protocols that address key elements that instruct entities to alter the BES. They are subject to R3 because they are receivers of Operating Communications.

Q: Does NERC plan to train the auditors across the 8 regions so there is consistency with compliance audits once the standards discussed today are in effect?

A: Hi Dave. The SDT neither has the authority nor the scope to address this concern. We are comfortable in supporting training and consistency and will pass your concern to our training team.

Q: DPs own and operate 138 kV breakers.

A: That is correct; some, not all DPs actually do own and operate BES equipment.

Q: Please explain what you mean by "observation" being looked at by auditors when voice recording is not available.

A: Observation means actually viewing and listening to operating personnel conduct and direct operations on the BES.

Q: GOPs give internal instructions of when to start and stop generating units.

A: That is correct; they would benefit from compliance with R1 and R3 of COM-003-1

Q: Please consider separating requirements when there is an "or" between two different conditions: "2.2. After the response is received, or if no response is received, do one of the following:..." This can be confusing.

A: We will consider it. Please include it in your comments.

Q: Will BES generator control rooms be required to have voice recording capability to be able to proceed evidence to prove compliance with the standard?

A: The types of evidence would be the same as listed in the standard M2 and M3 - *Evidence may include but is not limited to voice recordings, transcripts of voice recordings, on site observations, or other equivalent evidence.* Voice recordings are absolute and are a primary confirmation and I would say preferable. The other forms listed would be suitable. Are you aware of a BES entity that does not have a voice recording capability?

Q: each violation of com-003 has the potential for a \$100k fine. Should an operator use 3 part, but not alpha numeric, this would be a substantial fine

A: It could be depending on numerous circumstances.

Q: The Effective Date of COM-003-1 is 6 months after applicable regulatory approval. Don't you think this is too soon to see 100% compliance to train field personnel and system operators?

A: That is worth review by the SDT. We will discuss this concern and address it in our next posting.

Q: What if field personnel request the system operator change state of a device?

A: The field person is making a request, not issuing an instruction. The operator would either agree or disagree. If the operator agrees he or she will issue the appropriate Operating Communication.

Q: COM-002-3 R1 "...shall identify the action as a Reliability Directive" Must this be done as part of the issuance of the Directive or can entities identify what situations constitute emergencies, ahead of time in their procedures?

A: Yes

Q: This is a repeat - but wanted to be sure I am hearing correctly. - Since Reliability Directives are subsets of Operating Communications - then English, alpha numeric and 24 hour clock applies under COM-003 R1.2 which covers all oral Operating Communications

A: That is correct

Q: How are Distribution Providers subject to the COM-003 standard?

A: The SDT believes the standard applies to Distribution Providers under some circumstances such as instructions to shed load. When DPs are involved with Operating Communications they must be compliant with R1 and R3 of COM-003-1.

Q: Am I correct in my understanding that the use of alpha-numeric's or phonetic numerals only are not an actual requirement but if Operators use them it must be from an accurate source such as NATO's spelling alphabet?

A: The operators shall use them when engaged in Operating Communications and if operators use them they must accurately represent the letter or number intended by the issuer or receiver. The NATO Phonetic alphabet is the most common and widely used worldwide. Commenters from the first draft stated using Baker instead Bravo (NATO) still properly clarifies the letter or numeral in the alpha numeric identifier and that an entity should not be penalized for using Baker. The SDT agreed and permitted the use of other clarifiers as long as they properly represent the letter or number intended.

Q: Regarding your recent response on directives between operators across the room. How would one demonstrate compliance with the standard?

A: The types of evidence would be the same as listed in the standard M2 and M3 - *Evidence may include but is not limited to voice recordings, transcripts of voice recordings, on site observations, or other equivalent evidence.*

Q: so, if it is not applicable to a GOP, then the RC, BA or TOP giving the order (like today) would be non-compliant for no repeat-back?

A: The GOP is excluded from R2 in COM-003-1, but is applicable in R3 (and R1). Normally a GOP would not issue an Operating Communication but could receive one. R3 stipulates the requirement for the receiver which includes compliance with a "repeat back"

Q: The question was around self-certification. Is every phone call going to need to be monitored to ensure compliance?

A: Every Phone call that is an Operating Communication should be monitored.

Q: I've heard many say that this is a "how-to" standard and NERC should provide the "what" not the "how". What is the Standard Drafting Team's response to such comments?

A: The OPCP SDT was chartered to develop Communication Protocols for Operating Personnel. The SDT believes 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.