Project 2007-02 Operating Personnel Communications Protocols

### Unofficial Comment Form for Standard COM-003-1 —Operating Personnel Communications Protocols

Please **DO NOT** use this form. Please use the [electronic comment form](https://www.nerc.net/nercsurvey/Survey.aspx?s=652a26d77070424288715992850117af) located at the link below to submit comments on the proposed draft COM-003-1 Operating Personnel Communications Protocols standard. Comments must be submitted by **June 20, 2012.** If you have questions please contact Joseph Krisiak at Joseph.Krisiak@nerc.net or by telephone at 609-651-0903.

<http://www.nerc.com/filez/standards/Op_Comm_Protocol_Project_2007-02.html>

### Background Information:

Effective communication is critical for Real-time operations. Failure to successfully communicate clearly can create misunderstandings resulting in improper operations increasing the potential for failure of the BES.

The Standard Authorization Request (SAR) for this project was initiated on March 1, 2007 and approved by the Standards Committee on June 8, 2007. It established the scope of work for the Project 2007-02 Operating Personnel Communications Protocols Standard Drafting Team (OPCP SDT). The scope described in the SAR is to establish essential elements of communications protocols and communications paths such that operators and users of the North American Bulk Electric System will efficiently convey information and ensure mutual understanding. The August 2003 Blackout Report, Recommendation Number 26, calls for a tightening of communications protocols. FERC Order 693 Paragraph 532 amplifies this need and applies it to all Operating Communications. This proposed standard’s goal is to ensure that effective communication is practiced and delivered in clear language and standardized format via pre-established communications paths among pre-identified operating entities.

The SAR indicated that references to communication protocols in other NERC Reliability Standards may be moved to this new standard. The SAR instructed the standard drafting team to consider incorporating the use of Alert Level Guidelines and three-part communications in developing this new standard to achieve high level consistency across regions. The SDT believes the Alert Level Guidelines, while valuable, belong in a separate standard and has petitioned the Standards Committee to approve the transfer to another standard or to start a separate project.

The standard will be applicable to Transmission Operators, Balancing Authorities, Reliability Coordinators, Generator Operators, and Distribution Providers. These requirements ensure that communications include essential elements such that information is efficiently conveyed and mutually understood for communicating changes to real-time operating conditions and responding to directives, notifications, directions, instructions, orders, or other reliability related operating information.

The Purpose statement of COM 003-1 states: “To specify clear, formal and universally applied communication protocols that reduce the possibility of miscommunication which could lead to action or inaction harmful to the reliability of BES.”

Based on stakeholder comments and observations from the Quality Review team, the OPCP SDT made the following changes to COM-003-1:

* **New NERC Glossary terms**:

The SDT has eliminated the definitions; Communications Protocol, Three-part Communication and Interoperability Communication proposed in the first draft of the standard and added a definition for *Operating Communications*. Operating Communications more accurately defines the broad class of communications that deal with changing or altering the state of the BES. Changes to the BES operating state with unclear communications create increased opportunities fo*r events that could plac*e the BES at an unacceptable risk of instability, separation, or cascading failures.

* **Communication Protocol Operating Procedure (CPOP):**

The SDT eliminated the CPOP from the standard based on stakeholder comments indicating this is administrative in nature.

* **English Language:**

The SDT modified the standard (R3 in the first draft of COM-003-1, R1 Part 1.1.1 in the second draft of COM-003-1) to address comments which point out that in some regions, the use of another language other than English may be mandated by law.

* **Pre-defined System Condition Terminology:**

The Alert Level Guide document was originally prepared by the Reliability Coordinator Working Group (RCWG) in accordance with a U.S./Canada Task Force Blackout Report Recommendation. Recommendation #20 called for the establishment of clear definitions of normal, alert, and emergency operational system conditions, and to clarify the roles, responsibilities, and authorities of Reliability Coordinators and other responsible entities under each condition.

After many comments and much discussion the SDT believes the Alert Level Guide is better suited in its own standard or in a standard that deals with alert conditions and notification. The content was not related to communication protocols designed to clarify operating communication on the BES. The SDT has petitioned the Standards Committee to approve of a transfer to another standard or to a new standard as it deems appropriate.

* **Time Zone Reference:**

The first draft of COM-003-1 included a requirement to use Central Standard Time for operating communications (R4) and stakeholders identified that unless people are communicating in different time zones, this requirement may be a distraction. The SDT modified the standard to require inclusion of time zone references only in those situations where communication is between entities in different time zones**.**

* Three-part Communication:

The first draft of COM-003-1 included a single requirement for use of three-part communication (R5). Several stakeholders noted that three-part communication is being addressed in two standards. While the OPCP SDT originally planned on proposing retirement of COM-002-3, the team has been convinced that keeping three part communication in both COM-002-3 and COM-003-1 has value.

* The three-part communications in COM-002-3 are limited to Reliability Directives and have a “High” VRF.
* The three-part communications in COM-003-1 are focused on Operating Communication except for Reliability Directives which are a subset of Operating Communications. The requirements for three-part communications in COM-003 have a “Medium” VRF.

The OPCP SDT split the three-part communication requirement into two separate proposed requirements; R2 andR3 to address responsibilities of the issuer and of the receiver respectively during Operating Communications. The SDT also clarified that repeat-back does not have to be exactly verbatim; however the message must be accurately conveyed and understood.

* **NATO Alphabet or Correct alpha numeric clarifiers:**

The first draft of COM-003-1 had a requirement for use of the NATO Alphabet during operating communications (R6). Many stakeholders indicated that the NATO Alphabet is only one way of providing clarity and proposed that other alpha-numeric clarifies should be acceptable. In response the modified the standard to require use of the NATO Phonetic Alphabet or a correct alpha-numeric clarifier when issuing and replying to verbal Operating Communications that involve alpha-numeric information. The revised standard clarifies that the use of another correct alphanumeric clarifier is permitted as long as the content is fully and accurately conveyed. During spoken communications certain sounds become difficult to discern because they are audibly similar. The use of the NATO Phonetic Alphabet or proper phonetically correct clarifiers is not intended for all verbal communications but is required for Operating Communications involving alpha-numeric identifiers. (See Requirement R1, Part 1.2 in the second draft of COM-003-1.)

* **Line and Equipment Identifiers:**

The first draft of COM-003-1 had a requirement (R7) for use of pre-determined, mutually agreed upon line and equipment identifiers for verbal and written operating communications. Stakeholders indicated that obtaining such agreements was not necessary and recommended narrowing the scope of this requirement. In response, the OPCP SDT modified the scope of the requirement so it only applies to oral and written operating communications involving a Transmission interface Element or Facility and replaced the need for an agreement with use of the name of the Facility/Element specified by the owner of that Transmission interface Element or Facility. (See Requirement R1, Part 1.1.4 in the second draft of COM-003-1.)

* **VSL and VRF Changes from version one:**

The OPSDT reviewed the VRFs and VSLs associated with R1, R2 and R3 and made changes to more closely conform to NERC and FERC guidelines. Where the first draft of COM-003-1 proposed having a “High” VRF for all real-time communications, the second draft of COM-003-1 proposes a “Medium” VRF for each of the three remaining requirements.

The choice of VRFs was made on the basis of the potential impact on the Bulk Electric System of a miscommunication during Operating Communications. Requirements R1, R2 and R3 are assigned a Medium Violation Risk Factor – a violation of one of these requirements, by itself, could directly affect the electrical state or the capability of the Bulk Electric System, or the ability to effectively monitor and control the Bulk Electric System, but a violation by itself would not lead to Bulk Electric System instability, separation, or Cascading failures.

The VSLs in the second draft of COM-003-1 are all new.

The drafting team is posting the standard for industry comment for a 45-day comment period.

TheOperating Personnel Communications Protocols Drafting Team would like to receive industry comments on this draft standard. Accordingly, we request that you include your comments on this form by **June 20, 2012**.

### \*Please use the [electronic comment form](https://www.nerc.net/nercsurvey/Survey.aspx?s=652a26d77070424288715992850117af) to submit your final comments to NERC.

1. **Do you agree with the addition of “Operating Communication” as a proposed new definition for the NERC Glossary and the elimination of “Communication Protocol,” “Interoperability Communication” and “Three part Communications” proposed in the first draft of COM-003-1?**

**Operating Communication:** Communication of instruction to change or maintain the state, status, output, or input of an Element or Facility of the Bulk Electric System.

**If not, please explain in the comment area.**

[ ]  Yes

[ ]  No

Comments:

1. **The SDT eliminated the requirement to have a Communications Protocol Operating Procedure from the proposed standard because it is administrative in nature. Do you agree with this modification? If not, please explain in the comment area.**

[ ]  Yes

[ ]  No

Comments:

1. **The SDT has proposed to transfer the requirement to use Alert Levels in Attachment 1 to another more closely aligned standard or to a separate new standard. Do you agree with this transfer? If not, please explain in the comment area.**

[ ]  Yes

[ ]  No

Comments:

1. **The SDT modified the standard to allow an exemption from the requirement to use English language where the use of another language is mandated by law or regulation. (See Requirement R1, Part 1.1.1) Do you agree with this modification? If not, please explain in the comment area.**

[ ]  Yes

[ ]  No

Comments:

1. **The SDT modified the standard to mandate utilization of a 24 hour clock for all times and to mandate the use of a time zone and indicate whether the time is daylight saving time or standard time reference when Operating Communications occur between different time zones. (See Requirement R1, Part 1.1.3) Do you agree with this modification? If not, please explain in the comment area.**

[ ]  Yes

[ ]  No

 Comments:

1. **The SDT modified the requirement for use of three-part communications for Operating Communications to clarify that this is not applicable for Reliability Directives and split the single requirement into two requirements: one for the issuer (R2) and another for the receiver (R3). Do you agree with this modification?**

[ ]  Yes

[ ]  No

Comments:

1. **The SDT modified the requirement for use of the NATO phonetic alphabet to allow use of another correct alpha numeric clarifier. (See Requirement R1, Part 1.2.) Do you agree with this modification?**

[ ]  Yes

[ ]  No

Comments:

1. **The SDT modified the requirement for use of identifiers to limit the applicability to operating communications involving Transmission interface Elements/Facilities and to require use of the name for that Element/Facilities specified by the Element/Facility’s owner(s). Do you agree with this modification?**

[ ]  Yes

[ ]  No

Comments:

1. **Do you agree with the VRFs and VSLs for Requirements R1, R2 and R3?**

[ ]  Yes

[ ]  No

Comments:

1. **If you have any other comments or suggestions to improve the draft standard that you have not already provided in response to the previous questions please provide them here.**

Comments: