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=5d5a917dbf7147ae900880a0e9139b3b) 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 **July 19, 2013.** 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 Bulk Electric System (BES) 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 to be done for Project 2007-02 Operating Personnel Communications Protocols (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. This proposed standard’s goal is to ensure that effective communication is practiced and delivered in clear language and standardized format.

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 Operating Instructions.

The Purpose statement of COM 003-1 states: “To strengthen communications for the issuance of Operating Instructions with predefined communications protocols that reduce the possibility of miscommunication that could lead to action or inaction harmful to the reliability of the Bulk Electric System.”

1. **New NERC Glossary terms**: The SDT has added language to the previous definition of “Operating Instructions” proposed in the Standard version 5 to further clarify the distinction between an “Operating Instruction” and a “Reliability Directive*.”*

 “*Operating* *Instructions”* differentiates the broad class of communications that deal with changing or altering the state of the BES from general discussions of options or alternatives; and from Reliability Directives that apply to Adverse Reliability Impacts and Emergencies on the BES. Changes to the BES operating state with unclear communications create increased opportunities for events that could place the bulk electric system at an unacceptable risk of instability, separation, or cascading failures.

This term is proposed for addition to the NERC Glossary to establish meaning and usage within the electricity industry.

1. **COM-003-1, Draft 6 now features 3 requirements.** The requirement structure and language has been changed in draft 6 based on changes to the standard recommended by Industry representatives who commented on draft 5 and from Industry representatives who participated in the Informal Review of the proposed draft 6 standard. The language in COM-003-1, draft 6, R1 retained from the “Communications in Operations” Conference of February 14-15, 2013, in Atlanta still permits applicable entities flexibility to develop their communication protocols, but requires applicable entities to **develop the protocols, subject to the Reliability Coordinator’s approval**. This addresses commenters’ concerns over uniformity within Reliability Coordinator control areas.

The assess and correct language has been removed (COM-003-1, draft 5, R2 and R4) based on concerns over compliance with internal controls. Rather than focus on internal controls and System Operator performance improvement controls, the COM-003-1, draft 6, R2 and R3 requirements now focus on **misuse or lack of use of the communication protocols (developed in COM-003-1, draft 6, R1) resulting in the issuance of a Reliability Directive**. This approach requires the entity to manage the effective use of their governing communication protocols to avoid a situation that will initiate an Adverse Reliability Impact or an Emergency on the BES. This directly links communication to a reliability result, which is a recommendation offered by commenters in the last 5 drafts.

**Documented Communication Protocols:** The OPCPSDT has retained requirement COM-003-1, draft 5, Requirement R1 and eliminated COM-003-1, draft 5, Requirement R3, which addressed communication protocols for entities that are solely receivers of Operating Communications (DPs and GOPs). R1 in Draft 6 requires an applicable entity to jointly develop, subject to the Reliability Coordinator’s approval, documented communication protocols for the issuance of Operating Instructions in that Reliability Coordinator’s area, that ,if applicable will **address** the following elements:

* 1. English language: Requirement R1 Part 1.1 – The use of the English language when issuing or responding to an oral or written Operating Instruction, unless another language is mandated by law or regulation.
	2. Time Identification: Requirement R1 Part 1.2 – The instances, if any, which require time identification when issuing an oral or written Operating Instruction and the format for that time identification.
	3. Line and Equipment Identifiers: Requirement R1 Part 1.3 – The nomenclature for Transmission interface Elements and Transmission interface Facilities when issuing oral or written Operating Instructions.
	4. Alpha-numeric clarifiers: Requirement R1 Part 1.4 – The instances, if any, where alpha-numeric clarifiers are necessary when issuing an oral Operating Instruction and the format for those clarifiers.
	5. Three-part Communication: Requirement R1 Part 1.5. The instances where the issuer of an oral two party, person-to-person Operating Instruction requires the receiver to repeat, restate, rephrase, or recapitulate the Operating Instruction and the issuer to:
* Confirm that the response from the recipient of the Operating Instruction was accurate, or
* Reissue the Operating Instruction to resolve a misunderstanding.

**Eliminated in Draft 6 by OPCPSDT:**

* + **One-way burst messaging system to multiple parties (all call)** based on industry comments. Requirement R1 Part 1.7, Requirement R1 Part 1.8
	+ **One-way burst messaging system to multiple parties (all call)** based on industry comments. Requirement R3 Part 3.3
	+ **Uniformity of communication protocols among entities** (Requirement R1 Part 1.9) Based on industry comments replaced 1.9 with change to R1 language to jointly develop and issue communication protocols within a Reliability Control area.
1. **VSL and VRF Changes from version five:** The OPCPSDT modified the VRFs and VSLs associated with R1, R2, and R3, to conform to NERC and FERC guidelines.

The SDT is proposing to retire Requirement R4 from COM-001-1 and incorporate it into Requirement R1 of COM-003-1. Since Requirement R4 from COM-001-1 carries over essentially unchanged there is no specific question related to it in this Comment Form.

The choice of VRFs was made on the basis of the potential impact on the Bulk Electric System of a miscommunication during Operating Instructions. Requirements R1 is assigned a Low Violation Risk Factor due to its level of risk on BES operations. Requirements R2 and R3 are assigned a Medium Violation Risk Factor due to their more direct impact on BES reliability.

Time Horizons were selected to reflect the period within which the requirements applied. Requirements R1 must be implemented in long term planning operations and therefore is assigned a Time Horizon of Long Term Planning. R2 and R3 must be implemented in the Real Time Horizon.

The drafting team is posting the standard for industry comment for a 30-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 **July XX, 2013**.

Comment Form

**\*Please use the** [**electronic comment form**](https://www.nerc.net/nercsurvey/Survey.aspx?s=5d5a917dbf7147ae900880a0e9139b3b) **to submit your final comments to NERC.**

1. **The OPCPSDT has proposed significant changes to the COM-003-1, draft 6. Do you agree that COM-003-1, draft 6 addresses the August 2003 Blackout Report Recommendation number 26, FERC Order 693 and the COM-003-1 SAR? If not, please explain in the comment area of the last question.**

[ ]  Yes

[ ]  No

Comments:

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

[ ]  Yes

[ ]  No

Comments: