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Individual
Jennifer Wright
San Diego Gas & Electric
Yes
Individual
Steve Alexanderson
Central Lincoln
Yes
Yes
No
The new requirement presents us with a paradoxical situation. The communication has failed, so we must consult: yet consultation requires communication. We note that the SDT used the word "any", implying that multiple communication paths are required. The reality of the situation at Central Lincoln, due to our remote location, is that a single backhoe incident at the right location can take out all of our of our communication capability (including the terrestrial portion of the cellular networks) with our BAV/O, making this requirement impossible to meet for this circumstance using our present capabilities. We also note that no time limit was indicated. Most interruptions are brief, and fixed before consultation could reasonably take place. CEAs will be finding entities non-compliant for quickly fixing problems at their end without first consulting to ensure the restoration time was agreeable. To avoid non-compliance, entities will be forced delay repairs while they investigate alternative communication paths for consultation purposes. We fail to see how such an outcome improves reliability. The new requirement is one sided, requiring the DP and GOP to consult with no corresponding requirement for the TO or BA to have personnel available for such a consultation. Consultation failure or failure to mutually agree due to actions or inactions on the part of the TO or BA should not result in an enforcement action against the DP or GOP, yet that is how the requirement is written. The new requirement fails to add any "clarity" to the other requirements, and we don't see that the stakeholders thought there was a problem with DP/GOP obligation clarity. Instead, it adds new obligations with no justification for how they enhance reliability. We suggest removing the requirement.
Yes
As stated in our prior comments, we continue to have problems with COM-002 R2 and R3 as written. The SDT's answer ("It is the expectation that an issuer of a Reliability Directive would request a return call by the Distribution Provider operating personnel, then issue the Reliability Directive") addresses our concern perfectly, and we would agree with such an expectation. Unfortunately, the expressed expectation is not in the proposed standard or even in a proposed guideline for the standard.
Group
SERC OC Standards Review Group
Gerald Beckerle
Yes
No
We are concerned regarding communications between Transmission Operators on opposite ends of DC ties which may or may not be in the same interconnection. Similarly, COM-001, R1.2 limits the requirement of adjacent Reliability Coordinators to the same interconnection and this should not be limited to the same interconnection whether it is synchronous or non-synchronous. The measures should also be verified to ensure that they align properly with the final requirements.
Yes
We suggest that this phrase should also be removed from the "Purpose" statement.
No
We suggest Requirement 11 should be deleted as the generic nature of the term "...any of its Interpersonal Communications capabilities..." could be interpreted to include communications capabilities used for internal DP/GO purposes. Such DP/GO internal communications capability would not be critical to BES reliability. Also, no BES reliability benefit is realized by the parties simply agreeing to a time for the restoration of the failed Interpersonal Communication capability.
No
We suggest adding the words "and identified as a reliability directive to the recipient" at the end of the definition of Reliability Directive. As written, this definition could lead to a dispute of what communications are Reliability Directives: leading to further dispute as to what Requirements are applicable. By adding this clarity in the definition of this term, clarity will not be needed in the application of this definition as is proposed in COM-002-3, Req 1. This would allow the removal of R1 from COM-002-3
COM-001-2 Comments Definition of Alternative Interpersonal Communication: The proposed definition uses the term "medium". What is the scope of that? Telephony is a "medium" but there is wired, wireless, satellite, etc. Was "medium" intended to differentiate voice, paper, text, email, teletype, or something else? Does the qualifying term "same" when modifying infrastructure mean something like voice versus written? What about situations where the primary telephone system is Voice Over Internet Protocol (VOIP) and it is using the same computer network infrastructure as an email or messaging system. That is the "same infrastructure" but a different "medium" R1 and R2 - We suggest the drafting team look at Standard EOP-008, Requirements R3 and R8 and add appropriate language in Standard COM-001-2, to avoid instantaneous non-compliance for loss of Interpersonal Communications and/or alternate Interpersonal communications. R1 - In later requirements it is proposed that the entity "...shall designate an...". It is suggested that for consistently and audit ability, this concept be used for R1, R3, R5, R7 and R8. In addition, the qualifier of "primary" should be used such that the requirements read "... shall have designated, primary Interpersonal Communications capability with the following entities:." Although it is appropriate that "Alternative" be capitalized since it is used in a defined term (i.e. Alternative Interpersonal Communication) that bounds acceptable alternative methods, we do not see the need to capital "primary". R9 - The requirement is unclear if the required monthly test is a general functionality test or if there is the expectation of testing the designated Alternative Interpersonal Communications with all of the entities defined in the sub-requirements of R2, R4, and R6. There is no expectation of testing the primary Interpersonal Communications - is this intentional or an oversight? Although functional testing of this should be done as a normal course of business, should an explicit test be required with each entity in the sub-requirements of R1, R3, R5, R7 and R8 to insure, for example, that all the phone numbers are correct? R10 - The following scenario seems plausible: The Interpersonal Communications fails and is detected at 14:00 and gets fixed at 14:35. It lasted more than 30 minutes but is fixed. As written the requirement would require the responsible entity to notify entities identified in R1 through R6 by 15:00 (i.e. 60 minutes from detection) even though the problem no longer exists. Is that the expectation? Does COM-001 apply only to primary control centers or back-ups, per EOP-008, as well? M9 reads "at least on a monthly basis". We suggest that this be changed to "at least once per calendar month" as written in R9. This change should also be corrected in the VSLs. M8 - We suggest removing the second "that" in the first sentence of the measure. M10 - We suggest this be revised to coincide with changes made in R10 (deleting impacted and adding as identified in Requirements R1 through R6), therefore M10 should read: "Each Reliability Coordinator, Transmission Operator, and Balancing Authority, shall have and provide upon request evidence that it notified entities as identified in Requirements R1 through R6 within 60 minutes of the detection of a failure of its Interpersonal Communications capabilities that lasted 30 minutes or longer. Evidence could include, but is not limited to dated operator logs, dated voice recordings or dated transcripts of voice recordings, electronic communications, or equivalent evidence. (R10)." * M12 needs to be removed. We question why the first paragraph of Section 1.3 - Data Retention has been included in each of these three standards. We suggest that it should be removed from each standard. COM-002-3 Comments R2 - We recommend that the following phrase (in quotes) be added to R2: Each Balancing Authority, Transmission Operator and Distribution Provider that is the recipient of a Reliability Directive shall repeat, restate, rephrase or recapitulate the Reliability Directive "immediately upon receiving it." As written, there is no limit as to when the entity must repeat it (i.e. they could wait 2 hours) The Standard is not clear as to what each entity is to do when more than one entity receives a Reliability Directive at the same time (e.g. during a RC area teleconference call). For example, is a roll call of receiving entities expected to be held so that they individually can repeat, restate, rephrase or recapitulate the Reliability Directive followed by individual confirmation required in R3? IRO-001-3 Comments We recommend that where the verb "direct/directed" or noun "direction" is used in Purpose, R1, R2 and R3, that it be replaced with the verb "instruct/instructed" or noun "instruction", as appropriate. This would help the industry avoid confusion often referred to as "big D" or "little d" directives. It is noted that the term "Reliability Directive" does that to a great degree but avoiding the

verb/noun "direct/direction" would augment the difference. R1 - At what point in time is "identified" referring to in "...to prevent identified events or...? Is it referring to current or future events? One might assume both since the "Time Horizon" is defined as Real-time Operations, Same Day Operations and Operations Planning, but the requirement may be enhanced if explicitly stated ("...to prevent events identified in real-time or in the future or to mitigate the magnitude..."). For clarity, the scope of the authority should be limited to the Reliability Coordinator Area ("...that result in an Emergency or Adverse Reliability Impacts within its Reliability Coordinator Area"). As written, it implies the authority should extend outside its RC Area. R2 - We question the phrase "physically implemented" and recommend that the intent be clarified in the language. We note the following comment and response posted under Consideration of Comments on Initial Ballot - Reliability Coordination (Project 2006-06) Date of Initial Ballot: February 25 - March 7, 2011: "IRO-001 R2, R3, and R4 have replaced "Directives" with the word direction in lower case (while it appears that "Directives" is a subset of "directions"). We believe that this muddies the waters and could bring numerous conversations and dialog into scope unnecessarily. The end result is that the RC has the right to issue and use "Directives" and anything short of this could just be communications. For example, a number of entities that are Reliability Coordinators also facilitate energy markets. There are many communications related to markets that probably should be out of scope with respect to the standards. Furthermore, it might not be clear what role (eg Reliability Coordinator, market operator, etc) the staff at these entities is fulfilling. Response: IRO-001 is written to cover both typical daily operating scenarios and also emergency scenarios. The required performance encompasses issuing and responding to Reliability Directives as well as other directions. The requirement language specifically ties back to Requirement R2 which states that the RC "shall take actions or direct actions, which could include issuing Reliability Directives, ". This is the "direction in accordance with Requirement R2" stated in R3 and the "direction in accordance with Requirement R3" stated in R4." We believe the entity's comments remain valid and the response provided by the SDT does not address all aspects of the concern. We suggest that the language be changed to "Reliability Directive" consistent with COM-002, R3. The requirement states the responsible entities shall "inform" its RC when unable to perform as directed but it is unclear when the notification needs to take place. Although the term "as soon as practical" may seem to be unmeasurable, as written now there is no time deadline to perform the notification - i.e. it could be 4 hours later after recognition. M2 - need to add the following words "compliance with, physically, unless" which were included in R2, therefore M2 should read "Each Transmission Operator, Balancing Authority, Generator Operator, Interchange Coordinator and Distribution Provider shall have and provide evidence which may include, but is not limited to dated operator logs, dated records, dated and time -stamped voice recordings or dated transcripts of voice recordings, electronic communications, or equivalent documentation, that will be used to determine that it complied with its Reliability Coordinator's direction(s) per Requirement R1 unless compliance with the direction per Requirement R1 could not be physically implemented or unless such actions would have violated safety, equipment, regulatory or statutory requirements. In such cases, the Transmission Operator, Balancing Authority, Generator Operator, Interchange Coordinator or Distribution Provider shall have and provide copies of the safety, equipment, regulatory or statutory requirements as evidence for not complying with the Reliability Coordinator's direction. (R2) " Section 1.3, the second bullet: need to add calendar to 12 calendar months "The comments expressed herein represent a consensus of the views of the above named members of the SERC OC Standards Review group only and should not be construed as the position of SERC Reliability Corporation, its board or its officers."
Group
Salt River Project
Chris Chavez
Yes
Group
Pacific Northwest Generating Cooperative
Ron Sporseen
Yes
Yes
Yes
No
As per COM-001-2, R7, "Each Distribution Provider shall have Interpersonal Communications capability with the following entities..." R11 states that the DP or GO that experiences a failure of its Interpersonal Communications ability shall consult with TOPs and BAs and agree on how to restore Interpersonal Communications. We believe better language might be, "Restore Interpersonal Communications with your TOP/BA as soon as operationally feasible."
Yes
The PNGC Comment Group believes COM-002-3, R2, lacks justification for applicability to a Distribution Provider (DP). RCs in the WECC region do not communicate reliability directives to DP only entities. Having this requirement apply to DPs seems to indicate that we will need 24/7 communications capability to record and respond to calls that will never come in order to satisfy the requirement with no improvement to reliability. The SDT's response from the last round of comments: "It is the expectation that an issuer of a Reliability Directive would request a return call by the Distribution Provider operating personnel, then issue the Reliability Directive". Nowhere is this expectation provided for in the written standard. If the issuer of a reliability directive has already called the DP, are they going to then re-issue the reliability directive after the DP calls them back?
Individual
Paul Kerr
Shell Energy North America
Yes
Yes
Individual
Keira Kazmerski
Xcel Energy
Yes
No
In COM-001-2, R4.3. Adjacent Transmission Operators synchronously connected within the same Interconnection. This new requirement has a term that is not defined Adjacent Transmission Operators.
Yes
Yes
Yes
Group
Northeast Power Coordinating Council
Guy Zito
No
NERC uses the terms "adjacent" and "neighboring" in various standards. It is generally believed that those terms have the same meanings, but there are those who believe those terms, as used, are intended to have different meanings. To ensure a consistent usage and understanding, the definition of the term adjacent must be made known before its addition to the standard. Consideration should be given to using only one term in all standards if adjacent and neighboring are intended to mean the same thing. Both terms are used in NERC Standards, sometimes both in the same standard. For example, EOP-001-2b uses "neighboring" in R5, and "adjacent" in R3.3.

For COM-001: 1. R1.2 and R2.2: The phrase "within the same Interconnection" is improper; it needs to be removed. RCs between two Interconnections still need to communicate with each other for reliability coordination (e.g. between Quebec and the other RCs in the NPCC region to coordinate reliability issues including curtailing interchange transactions crossing an Interconnection boundary). The SDT's response to industry comments on the previous posting that the phrase was added to address the ERCOT situation (that ERCOT does not need to communicate with other RCs and that such coordination takes place between TOPs) leaves a reliability gap. 2. R3.5 and R4.3: The phrase "synchronously connected within the same Interconnection" is also improper; it needs to be removed. TOPs do communicate with other TOPs including those asynchronously connected and in another Interconnection (e.g. between Quebec and all of its asynchronously interconnected neighbors). The reason that was used in response to the above comments (coordination among TOPs for DC tie operation) contradicts with the inclusion of this phrase in R3.5 and R4.3. 3. R4 and R6: Not requiring an Alternative Interpersonal Communication capability between the BAs and the DP and GOP can result in a reliability gap. If Interpersonal Communication capability between the BAs and these entities is required to begin with to enable BAs to communicate with these entities (such as operating instructions or Reliability Directives) to ensure reliable operations, then an alternative capability is also needed to ensure this objective is achieved when the primary capability fails. 4. To preclude the possibility of problems arising from having different languages spoken between entities, COM-001-1.1 R4 should remain as it was or those ideas kept in the revised requirement. R4 read: "R4. Unless agreed to otherwise, each Reliability Coordinator, Transmission Operator, and Balancing Authority shall use English as the language for all communications between and among operating personnel responsible for the real-time generation control and operation of the interconnected Bulk Electric System. Transmission Operators and Balancing Authorities may use an alternate language for internal operations." 5. Measure M3 does not cover the added R3.5 condition (having Interpersonal Communications capability with each adjacent TOP). M3 needs to be revised. For IRO-001: The Data Retention Section does not reflect the revised requirements. As examples: the Electric Reliability Organization is no longer a responsible entity; the Reliability Coordinator should replace the ERO for keeping data for R1. Transmission Operator, Balancing Authority, Generator Operator and Distribution Provider should replace the Reliability Coordinator for keeping data for R2. And, in the Data Retention Section, R4 and M4 are mentioned. However, there are only three requirements with their corresponding measures in the standard.
Group
Arizona Public Service Company
Janet Smith, Regulatory Affairs Supervisor
No
There is a risk of not properly identifying an abnormal condition (Emergency or Adverse Reliability Impact) in time to require specific use of the statement 'this is a Reliability Directive' when issuing switching on the system in the event of an emergency. This is a deviation from consistently using 3-way communication when an emergency occurs. It may not be apparent that an emergency exists and breaking from consistent use of expected 3-way communication could cause confusion.
Individual
Edward J Davis
Entergy Services, Inc
No
R3 adds additional responsibilities for the TOP to have Interpersonal Communications capability with EACH DP and GOP in its footprint. Similarly, R4 gives the TOP responsibility to have alternative communications capability with each of these entities. This is a significant additional responsibility for the TOP to document and perhaps arrange for additional means of communication with these entities. The short time frame provided for implementation of these requirements is not consistent with the additional effort and compliance documentation that is necessary to implement these requirements. Entergy recommends that the implementation time frame for these new requirements that apply to new entities, or expand the application of COM-001 for existing entities have an effective date 12 months beyond the applicable regulatory approval. Additionally, the implementation of the requirements that apply to the DP and GOP will represent an increase in the amount of documentation that must be retained to demonstrate compliance, and in some cases may also result in their having to purchase equipment or install new alternate means of communication. What is the improvement in reliability expected as a result of these new requirements?
Yes
Entergy agrees with the inclusion of the term "Adjacent" in these requirements to limit the entities that the BA or TOP must have communications capability with to those that they border.
Yes
Yes, the requirements of this standard pertain to having communications capability. The specific content of that communication should not be the subject of the standard.
No
The DP or GOP should have to notify the TOP and BA of its communications failure, similar to the requirement in R10 for TOP and BA. The DP or GOP should restore the communications capability as soon as possible. Entergy does not agree that the TOP or BA should have to negotiate the restoration time with the DP or GOP. This is an unreasonable burden on the BA and TOP.
No
An Adverse Reliability Impact is a type of Emergency. Including a new term for Adverse Reliability Impact and including both terms in the definition for Reliability Directive doesn't add clarity. I suggest changing the definition for Reliability Directive to remove phrase "or Adverse Reliability Impact."
Entergy does not agree with including the DP and GOP in this standard. However, if they are to be included and are required to have the communications capability indicated, they should be included in R10. Why would it be important for the TOP to notify the DP that their communications method has failed, but it is not important for the DP to notify the TOP when their communications method has failed. The distinction doesn't seem reasonable or meaningful. Additionally, in the draft of COM-002-3 requirement 2 contains the language that the recipient of the directive shall "repeat, restate, rephrase or recapitulate" the directive. Why are so many synonyms of repeat necessary. Repeat or restate should be sufficient to get the point across.
Individual
Michael Falvo
Independent Electricity System Operator
No
In COM-001, we commented earlier that the entities in R4 and R6 (now R5 and R6) should be the same, i.e. the BA needs to have the Interpersonal Communication capability as well as the Alternative Interpersonal Communication capability with the same entities. The SDT's response indicates that the suggested change is not needed since additionally requiring DP and GOP entities to have Alternative Interpersonal Communication capability would impose more cost on smaller DP and GOP entities that have little or no risk impact to the bulk electric system. We disagree with this assessment since the need to have Alternative Interpersonal Communication capability should be assessed from the viewpoint that whether or not the absence of such capability can adversely affect reliability. If Interpersonal Communication capability is needed between a BA and a DP/GOP to communicate reliability instructions or directives, then it is deemed necessary that such communication be provided at all times, which indicates the need for an alternative capability. We once again urge the SDT to make the list of entities in R5 and R6 to be the same.
No
(1) We agree with the addition of "Adjacent" entities in the quoted parts except the qualifier "synchronously connected within the same Interconnection" need to be removed from Parts 3.5 and 4.3 since TOPs do communicate with other TOPs even in another Interconnection (e.g. between Quebec and all of its asynchronously interconnected neighbors). Even in the case of ERCOT, TOPs on the two sides of a DC tie do communicate with each other for daily operations. (2) Measure M3 does not cover the added R3.5 condition (having Interpersonal Communications capability with each adjacent TOP). M3 needs to be revised.
No
In the last posting, we suggest removing the phrase "within the same Interconnection" from R1 (now R2.2) since there are RCs between two Interconnections that need to communicate with each other for reliability coordination (e.g. between Quebec and the RCs the Northeast such as IESO, NYISO, NBSO and ISO-NE, and between the RCs in WECC with the RCs in the Eastern Interconnection). Such coordination may include but not limited to curtailing interchange transactions crossing Interconnection/RC boundary, as stipulated in IRO-006. The SDT's response to our comments citing that the phrase was added to address the ERCOT situation leaves a reliability gap to the other situations. We again urge the SDT to remove the phrase. If necessary, the ERCOT situation can be addressed by a regional variance.
Yes
Yes
(1) The proposed implementation plan conflicts with Ontario regulatory practice respecting the effective date of the standard. It is suggested that this conflict be removed by appending to the implementation plan wording, after "applicable regulatory approval" in the Effective Dates Section A5 on P. 4 of the draft standard COM-001, COM-002 and IRO-001, and on P. 2 of COM-001's Implementation Plan and P. 1 of COM-002's and IRO-001's Implementation Plans, to the following effect: ", or as otherwise made effective pursuant to the laws applicable to such ERO governmental authorities." (2) COM-001: Measure M9: "monthly basis". Suggest changing "monthly basis" to "at least once per calendar month" to be consistent with the wording in R9. (3) IRO-001: Measures M1, M2, M3 - The types of evidence are listed in paragraph form. This is not consistent with presentation style in COM-001-2 Measures, where evidence is listed in bullet format. Suggest using bullet form for consistency. (4) IRO-001, Data Retention Section: i. The retention requirements do not reflect the revised requirements. For example: the Electric Reliability Organization is no longer a responsible entity; the Reliability Coordinator should replace the ERO for keeping data for R1; Transmission Operator, Balancing Authority, Generator Operator and Distribution Provider should replace the Reliability Coordinator for keeping data for R2; and there is no R4/M4. ii. Section 1.3, second paragraph: "The Reliability Coordinator, Transmission Operator, Balancing Authority, Generator Operator, or Distribution Provider... shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation." The word "or" between Generator Operator and Distribution Provider should be changed to "and".
Group
MRO NSRF
Will Smith
Yes
No
NERC has formally defined "Adjacent Balancing Authority" in the NERC Glossary of Terms, but not "Adjacent Transmission Operator". The MRO NSRF recommends that "Adjacent Transmission Operator" be defined similar to the "Adjacent Balancing Authority" definition in the NERC Glossary of Terms.

Yes
No
Please note that the use of the word "any" as in "Each Distribution Provider and Generator Operator that experiences a failure of any of its Interpersonal Communication capabilities..." will be viewed as meaning every Interpersonal Communication medium that an Entity has or uses. The NSRF recommends that the word "any" be removed from this Requirement. The NSRF recommends that R11 be revised to read: "Each Distribution Provider and Generator Operator that experiences a failure of any of its primary (or defined) Interpersonal Communication capabilities with its Transmission Operator or Balancing Authority..." In that way it focuses it down to the communications issues with the TOP or BA. In lieu of "primary" the SDT could state "defined" as long as it is not meant to be "any". The latter part of R11 states: "...shall consult with their Transmission Operator or Balancing Authority as applicable to determine a mutually agreeable time to restore the Interpersonal Communication capability." This ambiguous statement does not support reliability. Consulting with a TOP or BA does not solve the problem of the lack of Interpersonal Communication capabilities. The NSRF recommends this be rewritten as: "...shall consult with inform their Transmission Operator or Balancing Authority as applicable as to the status of the Interpersonal Communication capability". So the new R11 would read: "Each Distribution Provider and Generator Operator that experiences a failure of its primary (or designated) Interpersonal Communication with their Transmission Operator or Balancing Authority shall inform them, as applicable, as to the status of the Interpersonal Communication capability."
Yes
Has the SDT looked at combining COM-002-3 and IRO-001-3 into a single Standard? It would allow Entities a one stop shopping place to refer to issuing and receiving a Reliability Directive. The definition of Interpersonal Communication is: "Any medium that allows two or more individuals to interact, consult, or exchange information". As stated in Question 4, the use of the word any will bring in mediums that are outside the scope of this Standard. The NSRF recommends the following: Interpersonal Communication: The primary (or designated) medium that allows two or more individuals to interact, consult, or exchange information. In Standard COM-002-3 the MRO NSRF recommends that the Effective Date be the first day of the second calendar quarter after applicable regulatory approval, to be the same as COM-001-2 and IRO-001-3. In that way all 3 standards would be effective at the same time, making implementation much smoother. The below section will lead to entities hold evidence past the 12 month retention period. This ambiguous wording will force entities to hold data past the 12 month period as stated in the following paragraph, after the below sighting. Recommend that the first paragraph within 1.3 be deleted in its entirety. 1.3. Data Retention The following evidence retention periods identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit.
Individual
Si Truc PHAN
Hydro-Quebec TransEnergie
For COM-001: R1.2 and R2.2: The phrase "within the same Interconnection" is improper: it needs to be removed. RCs between two Interconnections still need to communicate with each other for reliability coordination (e.g. between Quebec and the other RCs in the NPCC region to coordinate reliability issues including curtailing interchange transactions crossing an Interconnection boundary). The SDT's response to industry comments on the previous posting that the phrase was added to address the ERCOT situation (that ERCOT does not need to communicate with other RCs and that such coordination takes place between TOPs) leaves a reliability gap. 2. R3.5 and R4.3: The phrase "synchronously connected within the same Interconnection" is also improper: it needs to be removed. TOPs do communicate with other TOPs including those asynchronously connected and in another Interconnection (e.g. between Quebec and all of its asynchronously interconnected neighbors). The reason that was used in response to the above comments (coordination among TOPs for DC tie operation) contradicts with the inclusion of this phrase in R3.5 and R4.3. 3. R4 and R6: Not requiring an Alternative Interpersonal Communication capability between the BAs and the DP and GOP can result in a reliability gap. If Interpersonal Communication capability between the BAs and these entities is required to begin with to enable BAs to communicate with these entities (such as operating instructions or Reliability Directives) to ensure reliable operations, then an alternative capability is also needed to ensure this objective is achieved when the primary capability fails. 4. To preclude the possibility of problems arising from having different languages spoken between entities, COM-001-1.1 R4 should remain as it was or those ideas kept in the revised requirement. R4 read: "R4. Unless agreed to otherwise, each Reliability Coordinator, Transmission Operator, and Balancing Authority shall use English as the language for all communications between and among operating personnel responsible for the real-time generation control and operation of the interconnected Bulk Electric System. Transmission Operators and Balancing Authorities may use an alternate language for internal operations." 5. Measure M3 does not cover the added R3.5 condition (having Interpersonal Communications capability with each adjacent TOP). M3 needs to be revised. For IRO-001: The Data Retention Section does not reflect the revised requirements. As examples: the Electric Reliability Organization is no longer a responsible entity; the Reliability Coordinator should replace the ERO for keeping data for R1. Transmission Operator, Balancing Authority, Generator Operator and Distribution Provider should replace the Reliability Coordinator for keeping data for R2. And, in the Data Retention Section, R4 and M4 are mentioned. However, there are only three requirements with their corresponding measures in the standard.
Individual
Daniel Duff
Liberty Electric Power LLC
Yes
Yes
Yes
No
The phrase "mutually agreeable time" needs to be replaced in order to make this standard acceptable. This phrasing creates a potential violation if equipment functionality cannot be restored in the time frame preferred by another entity, even if the time of repair is beyond the control of the RE. This phrase should be replaced with "inform their TO or BA as applicable of the failure, and provide estimates as to the time the Interpersonal Communication capabilities will be restored".
Yes
Individual
Joe O'Brien
NIPSCO
Yes
Yes
Yes
If the Interpersonal Communication is down, and no backup is required for the DP and GOP, how are they to consult and collaborate?
The question of whether one is in a state of Emergency or Instability, or in an Abnormal Condition can be still be subjective: it may be difficult to provide evidence for an audit.
In IRO-001 R2 an "and" is missing after Generator Operator, and the comma should be removed. Why are there 3 different Effective Dates for this project, each standard being different? To simplify, can't they all be made identical?
Group
City of Tacoma, Department of Public Utilities, Light Division, dba Tacoma Power
Claire Lloyd
Yes
Individual
Darryl Curtis
Oncor Electric Delivery Company LLC

Yes
for COM-001-2 Oncor takes the position that contacting all impacted entities within 60 minutes of the detection of a failure of its Interpersonal Communications capabilities that lasts 30 minutes or longer as prescribed in R1 through R6 is not doable within the ERCOT interconnect for a Transmission Operator. Oncor takes the position that notification only to the RC and BA is sufficient and that those two entities have the operational functionality to contact within the prescribed time all affected Distribution Providers, Generator Operators, and other Transmission Operators. R10 - Oncor takes the position that the word "impacted" added to R10 will clarify that notification only needs to be made to the entities that are effected by the failure of a communication path. This will also more align with the language in M10 For COM-002-3 Oncor request clarity about what constitutes a "recipient". For example, if a Transmission Grid Operator performing the functions of a Transmission Operator issues a Reliability Directive to its own field operations personnel to perform an action on behalf of the same entity, does the field operations personnel as the recipient become in affect a "Transmission Operator" subject to R2.
Individual
Chris de Graffenried
Consolidated Edison Co. of NY, Inc.
Yes
Yes
Yes
Regarding COM-002 Requirement R1, we recommend that this requirement be reworded as follows: "When a Reliability Coordinator, Transmission Operator or Balancing Authority requires actions to be executed as a Reliability Directive, the Reliability Coordinator, Transmission Operator or Balancing Authority shall require that the Reliability Directive be communicated using three-part communications as described in Requirements R2 and R3 of this standard". The reason for this recommended rewording are threefold: 1. Good operating practice calls for use of three-part communications at all times. The recommended re-write encourages the use of the good operating practice of three-part communications at all times, but does not require it. 2. It is not good operating practice to require that an additional (unnecessary) phrase be used during emergency situations. During emergency situations, it is best to use standard operating protocols so as to limit unnecessary burdens on operating personnel during critical and stressful times. 3. By implementing the proposed new R1 requirement, it would effectively weaken the need for rigorous compliance with any and all directives issued by the RC's, TO's or BA's. Regarding IRO-001 Requirement R1, we recommend that the current requirement R3 be reinstated as the new requirement R1. That is, the new requirement R1 should read as follows: R1. The Reliability Coordinator shall have clear decision-making authority to act and to direct actions to be taken by Transmission Operators, Balancing Authorities, Generator Operators, Transmission Service Providers, Load-Serving Entities, and Purchasing-Selling Entities within its Reliability Coordinator Area to preserve the integrity and reliability of the Bulk Electric System. These actions shall be taken without delay, but no longer than 30 minutes. We do not support any further dilution of Reliability Coordinator authority to enforce Reliability Directives through deletion of the 30 minute maximum response time period. The timely actions in response to any Reliability Coordinator issued Reliability Directives is an essential part of the process.
Individual
Anthony Jankowski
We Energies
Yes
Yes
Yes
Please add "does not include telemetered or derived data"
No
R11 Implies that R8 and R9 are independent and redundant to R5.3, R5.4 and R3.3 and R3.4. R11 is not clear on the purpose of the statement " determine a mutually agreeable time for restoration" this could be driven by forces outside the control any of the entities. I think" provide estimated restoration and actual restoration time and determine mutually agreeable alternative during outage" would be better. Update M9 accordingly
Yes
The definition is acceptable, but as used may imply that all Emergency communications must be Reliability Directives.
COM-001, Although a great improvement over existing COM-001, and eliminates the data component see comments: •For R5.1 Can the solutions included to meet R1 be included, same R3.2 and R5.2, same R5.3 and R7.2, same R5.4 and R8.1 •For R5.2 Can the solutions included to meet R2 be included, same R4.2 and R6.2 •R9 a 2 hour response for a once a month test seems extreme, as would require a secondary Alternate Interpersonal Communications capability •M9 is reasonable, but should include something about communication actual repair and or time estimates •R10 The use of R1 through R6 implies notification of both Interpersonal Communications and Alternate Interpersonal Communications failures. Do you notify if you become aware after the link is back up if it was down for GT 30 minutes, and Doesn't address notifying when restored •R11 Implies that R8 and R9 are independent and redundant to R5.3, R5.4 and R3.3 and R3.4. R11 is not clear on the purpose of the statement " determine a mutually agreeable time for restoration" this could be driven by forces outside the control any of the entities. I think" provide estimated restoration and actual restoration time and determine mutually agreeable alternative during outage" would be better. Update M9 accordingly COM-002 •Since all the Requirements are related to Reliability Directives, is it implied that all "Emergency Communications" are Reliability Directives even if not designated as such per R1. •The M2 measure could be difficult for a recipient such as a Distribution Provider or Generator Operator. A recipient's phone may not be recorded but a initiator's always should. If a receiver refused to meet the R2 requirement, an initiator should have an alternative. I.e. repeat the directive and provide potential penalties if recipient refuses to comply. Should the initiator have responsibility for providing the entire 3-way evidence as M3 implies? IRO-001, Although a great improvement over existing IRO-001, see comments: •R2 needs to be clear that it is the Reliability Coordinator's Reliability Directive that must be complied with not just any Reliability Coordinator's direction as stated. •The M2 measure could be difficult, as the operator would have to have access to documents proving the safety, equipment, regulatory or statutory requirements, which may be the assessment of an individual applying the safety rule. Is the measure requiring a deposition of the individual to be performed for each instance? With an assumed data retention of 90 day (voice) 12 month document retention the deposition would be unlikely to be acquired prior to the retention period ending. •R3 needs to be clear that it is the inability to perform the Reliability Coordinator's Reliability Directive that must be communicated not just any "Reliability Coordinator's as directed". •The Data Retention section does not align with the standard: The Reliability Coordinator shall retain its evidence for the most recent 90 calendar days for voice recordings or 12 months for documentation for Requirement R2, Measure M2. R2 and M2 apply to the Transmission Operator, Balancing Authority, Generator Operator, or Distribution Provider. There is no R4 and M4.
Individual
J. S. Stonecipher, PE
City of Jacksonville Beach dba/ Beaches Energy Services
In R5.3, should a BA have communications with a DP or LSE? For the TOP, it is the DP because the load influence is very local; however, for a BA the supply/demand balance is not local and in markets that allow retail competition, I'm thinking LSE is the right functional entity. For Florida, it doesn't really matter. If the LSE is the "correct" entity, then R7 would need to be changed and a new requirement specific to LSE's would need to be added
Yes
Yes
Yes
Yes
COM-001-2, R9 - "Each ... shall test its Alternative Interpersonal Communications capability". I would suggest adding the phrase "...to each entity for which Alternative Interpersonal Communications is required." to add clarity.
Individual
Scott Berry
Indiana Municipal Power Agency
No comment.
No comment.
No comment.
No

<p>IMPA does not believe that this requirement is necessary in order to ensure communication lines are restored by Distribution Providers and Generator Operators. If this requirement is kept, IMPA does not think the use of the words "a failure of any of its Interpersonal Communication capabilities" is acceptable. The wording is too inclusive and should apply to only primary Interpersonal Communication capabilities. IMPA is also concerned about how entities are supposed to know when the telephone companies may have equipment repaired in order to determine a mutually agreeable time to restore Interpersonal Communication capability. The entity may have no control over the restoration and hence would not be able to set a time other than whenever the capabilities are restored by for instance the telephone company. In addition, entities will have to keep evidence to show that a "mutually" agreeable time was reached by two or more entities. The most workable solution would be to require notification if primary Interpersonal Communication is lost and a follow-up notification when that capability is restored.</p>
No comment.
For R2 in IRO-001-3, the requirement needs to have the entities comply with their Reliability Coordinator's direction received in R1. Currently, requirement 2 directions are not linked back to R1 which means entities would have to comply with all Reliability Coordinator's directions regardless if they are associated with R1. For R7 in COM-001-2, IMPA does not believe that every Distribution Provider needs to be included in requirement 7. IMPA recommends stating that requirement 7 only applies to Distribution Providers who own an UFLS or UFLS system.
Individual
Jeff Longshore
Luminant Energy Company LLC
Yes
<p>IRO-001-3 R1 is not consistent with the direction taken in COM-002-3 which requires the Reliability Coordinator to identify Reliability Directive as such. The same approach should be taken with IRO-001-3 R1 so that the Reliability Coordinator is required to identify directions that are made to prevent identified events or mitigate the magnitude or duration of actual events that result in an Emergency or Adverse Reliability Impacts as such prior to or when issuing the directions. This extra specification is needed to eliminate any possible confusion in areas where the market operator and Reliability Coordinator are the same entity. In these areas, the Reliability Coordinator/market operator routinely gives directions to other entities that are not to prevent identified events or mitigate the magnitude or duration of actual events that result in an Emergency or Adverse Reliability Impacts. Without the added clarification the receiving entity may not know the urgency of the situation and may not know to inform the Reliability Coordinator if they are unable to perform as required by R3.</p>
Group
CCG, CPG, CECD
Brenda Powell
No
As we commented on Project 2007-03 TOP-001-2, the definition of Reliability Directive is an improvement but the definition must capture the identification concept that is reflected in the Requirement (R1). As a result, when Reliability Directive is used elsewhere, it would be clear that the communication must be identified as a Reliability Directive. We suggest the following revision to the definition and it should follow through to Project 2006-06 IRO-001-3 and Project 2007-03 TOP-001-2, eventually being added to the Reliability Standards Glossary of Terms. A communication identified as a Reliability Directive by a Reliability Coordinator, Transmission Operator, or Balancing Authority to initiate action by the recipient to address an Emergency or Adverse Reliability Impact.
Comments: IRO-001-3 uses the term "direct" in its purpose statement, R1, R2 and R3. To avoid confusion with a Reliability Directive (both for auditors and entities), we suggest the following: To establish the authority of Reliability Coordinators to make requests of other entities to prevent an Emergency or Adverse Reliability Impacts to the Bulk Electric System, R1: Each Reliability Coordinator shall have the authority to act or request others to act (which could include issuing Reliability Directives) to prevent identified events or mitigate the magnitude or duration of actual events that result in an Emergency or Adverse Reliability Impacts. R2: Each Transmission Operator, Balancing Authority, Generator Operator, Distribution Provider shall comply with its Reliability Coordinator's request unless compliance with the request cannot be physically implemented, or unless such actions would violate safety, equipment, regulatory or statutory requirements, or unless the TOP, BA, GOP or DP convey a business reason not to comply with the request but express that they will comply if a Reliability Directive is given. R3: Each Transmission Operator, Balancing Authority, Generator Operator, and Distribution Provider shall inform its Reliability Coordinator upon recognition of its inability to perform as requested in accordance with Requirement R2.
Individual
Brian J. Murphy
NextEra Energy, Inc.
Yes
Yes
Yes
No
No
NextEra Energy, Inc. (NextEra), which includes Florida Power & Light Company, believes that Requirement 11 of COM-001-2, as drafted, is too vague to be adopted as a mandatory Reliability Standard. For example, it is unclear what is meant by "shall consult." The North American Electric Reliability Corporation's (NERC) Rules of Procedure state that a foundation of any Reliability Standard is that: "... [the] reliability standard shall be stated using clear and unambiguous language. Responsible entities, using reasonable judgment and in keeping with good utility practices, are able to arrive at a consistent interpretation of the required performance." The term "shall consult" is not a term generally understood or used in the electric utility industry, and, therefore, does not enable a consistent interpretation of the performance required. Accordingly, NextEra requests that Requirement 11 either: (i) be deleted; or (ii) be redrafted to read more like Requirement 10.
No
NextEra objects to the use of "Adverse Reliability Impact" in Reliability Standards COM-002-3 and IRO-001-3. NextEra requests that the use of Adverse Reliability Impact be revised as suggested below or be deleted from the definition of Reliability Directive. NextEra does not agree with the use of Adverse Reliability Impact in the definition of "Reliability Directive" for the following reasons: 1. This term Adverse Reliability Impact is ambiguous. In part, the term is ambiguous because it includes in its definition the term "instability," which has led to considerable misunderstanding and confusion in the industry. There are also differing views on what is (and is not) Cascading, because the definition is not sufficiently clear. For example, some believe instability and Cascading occur when an event affects multiple substations of one Transmission Operator, while others believe instability or Cascading only occur when the event affects more than one Transmission Operator's system. As mentioned in response to item 4, above, Reliability Standards must be clear and consistently interpreted. It is not appropriate to issue a Standard that perpetuates the use of terms that lack consistent interpretation. 2. While not perfect, the term Emergency is better understood in the industry, and it may include many or all of the instances of instability or Cascading intended to be captured by Adverse Reliability Impact. Consequently, it is not advisable to introduce Adverse Reliability Impact as a new term, when it is not clearly distinguishable from Emergency. NextEra is concerned that an unclear and imprecise term, such as Adverse Reliability Impact, does not promote reliability, and, such a term is particularly troublesome in the context of real time system operations. Therefore, for the reasons stated above, NextEra believes that the term Adverse Reliability Impact should be deleted from the definition of Reliability Directive. In the alternative, if Adverse Reliability Impact is not deleted from the definition of Reliability Directive in Reliability Standards COM-002-3 and IRO-001-3, NextEra requests that Adverse Reliability Impact be revised to read: "an event or condition on the Bulk Electric System that may, or is leading to, Cascading over more than one Bulk Electric System transmission system."
NextEra has the following additional comments. COM-002-3 The purpose of COM-002-3 is: "To ensure Emergency communications between operating personnel are effective." This stated purpose is not the same as the specific requirement that three-way communication is used for a Reliability Directive. Thus, NextEra requests that the purpose be revised to read as follows: "To ensure that when a Reliability Directive is given that the Reliability Directive is explicitly stated and three-way communication is used." Consolidation of COM-002-3 and IRO-001-3 NextEra notes a continuing area of concern with the somewhat unsynchronized approach taken in the drafting process. Reliability Standards COM-002 and IRO-001 are now on version three, and still there is a somewhat unsynchronized approach being proposed. A clear and consolidated approach seems easily achievable with minimal effort. Thus, as proposed below, NextEra requests that COM-002-3 and IRO-001-3 be combined, which also would appear to allow for the retirement of certain requirements, such as TOP-001-1 R1-4. NextEra also is concerned that the current approach may have contributed to several significant misstatements in IRO-001-3, R1-3, which use the terms "direct," "direction" and "directed," instead of the term Reliability Directive as used in COM-002-3. COM-002-3 and IRO-001-3 indicate that three-way communication only is required when a Reliability Directive is issued. This begs the question of what are the potentially other, lower classes of directives in IRO-001-3 R1-3? And why do they need to be followed with or without three-way communication? Thus, at a minimum, NextEra requests that the terms direct, direction and directed be deleted from IRO-001-3 R1-3, respectively, and that Reliability Directive be inserted. This change, and other proposed changes, are reflected in NextEra's overall proposal to combine COM-002-3 and IRO-001-3 into one COM-002-3 standard: (Note: If the term Adverse Reliability Impact is revised as proposed by NextEra, then the term would not need to be stricken) R1. Each Reliability Coordinator shall have the authority to act and to issue a Reliability Directive to a Transmission Operator, Balancing Authority, Generator Operator and Distribution Provider within its operating region to prevent identified events that may lead to, or to mitigate the magnitude or duration of, an Emergency. [Violation Risk Factor: High][Time Horizon: Real-time Operations, Same Day Operations and Operations Planning] R1.1 Each Transmission Operator shall have the authority to act or issue a Reliability Directive to a Balancing Authority, Generator Operator and Distribution Provider within its operating region to prevent identified events that may lead to, or to mitigate the magnitude or duration of, an Emergency. [Violation Risk Factor: High][Time Horizon: Real-time Operations, Same Day Operations and Operations Planning] R1.2 Each Balancing Authority shall have the authority to act or issue a Reliability Directive to a Generator Operator and Distribution Provider within its balancing region to prevent identified events that may lead to, or to mitigate the magnitude or duration of, an Emergency. [Violation Risk Factor: High][Time Horizon: Real-time Operations, Same Day Operations and Operations Planning] R2. When a Reliability Coordinator, Transmission Operator or Balancing Authority issues a Reliability Directive, the Reliability Coordinator, Transmission Operator or Balancing Authority shall identify the action as a Reliability Directive to the recipient. [Violation Risk Factor: High][Time Horizon: Real-Time] R2. Each Balancing Authority, Transmission Operator, Generator Operator, and Distribution Provider that is the recipient of a Reliability Directive shall repeat, restate, rephrase or recapitulate the Reliability Directive. [Violation Risk Factor: High][Time Horizon: Real-Time] R3. Each Reliability Coordinator, Transmission Operator, and Balancing Authority that issues a Reliability Directive shall either [Violation Risk Factor: High][Time Horizon: Real-Time]: • Confirm that the response from the recipient of the Reliability Directive (in accordance with Requirement R2) was accurate, or • Reissue the Reliability Directive to resolve any misunderstandings. R4. Each Transmission Operator, Balancing Authority, Generator Operator, Distribution Provider shall comply with its Reliability Coordinator's Reliability Directive, unless compliance with the Reliability Directive cannot be physically implemented or unless such actions would violate safety, equipment, regulatory or statutory requirements. [Violation Risk Factor: High][Time Horizon: Real-time Operations, Same Day Operations and Operations Planning] R4.1 Each Transmission Operator, Balancing Authority, Generator Operator, and

Distribution Provider shall inform its Reliability Coordinator upon recognition of its inability to perform a Reliability Directive in accordance with Requirement R4. [Violation Risk Factor: High] [Time Horizon: Real-time Operations, Same Day Operations and Operations Planning] R5. Each Balancing Authority, Generator Operator, and Distribution Provider shall comply with its Transmission Operator's Reliability Directive, unless compliance with the Reliability Directive cannot be physically implemented or unless such actions would violate safety, equipment, regulatory or statutory requirements. [Violation Risk Factor: High] [Time Horizon: Real-time Operations, Same Day Operations and Operations Planning] R5.1. Each Balancing Authority, Generator Operator, and Distribution Provider shall inform its Transmission Operator upon recognition of its inability to perform a Reliability Directive in accordance with Requirement R5. [Violation Risk Factor: High] [Time Horizon: Real-time Operations, Same Day Operations and Operations Planning] R6. Each Generator Operator or Distribution Provider shall comply with its Balancing Authority's Reliability Directive, unless compliance with the Reliability Directive cannot be physically implemented or unless such actions would violate safety, equipment, regulatory or statutory requirements. [Violation Risk Factor: High] [Time Horizon: Real-time Operations, Same Day Operations and Operations Planning] R6.1. Each Generator Operator or Distribution Provider shall inform its Balancing Authority upon recognition of its inability to perform a Reliability Directive in accordance with Requirement R6. [Violation Risk Factor: High] [Time Horizon: Real-time Operations, Same Day Operations and Operations Planning] Conclusion Given the importance of having clear and concise Reliability Standards on the issue of directives and three-way communication, until the above concerns raised by NextEra in Items 4 through 6 are addressed, NextEra intends to continue to vote "no" on COM-001-2, COM-002-3 and IRO-001-3.
Individual
David Thorne
Pepco Holdings Inc.
Yes
Individual
John Bee
Exelon
Yes
No
May have an unintended effect on registrations as some GOPs use an intermediately dispatch organization that perform actions on behalf of the generating units.
Yes
Yes
Yes
Group
LG&E and KU Services Company
Brent Ingebrigtsen
Yes
Yes
Yes
No
Regarding R11, as written it is unclear when the DP and GOP are required to consult with their TOP or BA. "[A] failure of any of its Interpersonal Communication capabilities" could be construed to mean any internal phone line of either the DP or GOP failing. Internal phone lines do not affect either the DP's or GOP's ability to communicate with the TOP or BA. It is also unclear whether a failure of an interpersonal communication capability would require consultation if there were multiple other interpersonal communication capabilities that were still fully functional. Furthermore, what exactly is required in "consultation" and who would be responsible if the "consulting" entities did not come to a "mutually agreeable time" are questions that are left unanswered. LG&E and KU Services Company suggest the following language: R11. Each Distribution Provider and Generator Operator that experiences a failure of more than one of its Means for Interpersonal Communications or failure of its Alternative Means for Interpersonal Communication with their Transmission Operator or Balancing Authority shall notify their Transmission Operator or Balancing Authority regarding the time to restore the impacted Means for Interpersonal Communication or Alternative Means for Interpersonal Communication.
Yes
COM-001-2 Regarding COM-001-2 and proposed definitions, LG&E and KU Services recommends changing the terms being defined from "Interpersonal Communications" and "Alternative Interpersonal Communication" to "Means for Interpersonal Communication" and "Alternative Means for Interpersonal Communication." A communication is an exchange of information, not a medium. The medium is simply the means. LG&E and KU Services Company further recommend that each requirement be rewritten with these new defined terms as appropriate and that the word "capabilities" currently following the defined terms be removed from each of the requirements. We suggest the definition for "Means for Interpersonal Communication" be "A medium utilizing electromagnetic energy that allows two or more individuals to interact, consult or exchange information." We suggest the definition for "Alternative Means for Interpersonal Communication" be "Any Means for Interpersonal Communication that is able to serve as a substitute for, and does not utilize the same infrastructure (medium) as, Means for Interpersonal Communications used for day-to-day operation." Finally, LG&E and KU Services Company request clarification that the requirements to have in place Interpersonal Communications and Alternative Interpersonal Communications do not establish noncompliance for the unavailability of either medium provided the reporting requirements set forth in the standard are otherwise met. All Proposed Standards LG&E and KU Services Company suggest that the first paragraph in section 1.3 Data Retention be removed from all proposed standards. It states: "...For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit. While LG&E and KU Services Company is confident that the SDT intended to clarify entities' data retention responsibilities, this paragraph could be clarified to indicate that it does not require that any additional evidence be retained and provided beyond that written in the standard's requirements
Group
Bonneville Power Administration
Chris Higgins
Yes
BPA supports COM-001-2, COM-002-3 and IRO-001-3 as written and has no comments or concerns at this time.
Individual
Joe Petaski
Manitoba Hydro
Yes
Yes

Yes
No
COM-001-2 R11 does not specify a timeline in which entities have to come up with a 'mutually agreeable' time to restore Interpersonal Communication capability. Manitoba Hydro believes this omission creates a reliability gap and suggests that wording be revised as follows: '... shall consult with their Transmission Operator or Balancing Authority as applicable and determine a mutually agreeable time to restore the Interpersonal Communication capability within 24 hours of experiencing the failure.'
Yes
COM-001-2 -Definition 'Interpersonal Communication' - for clarity, the definition should explicitly state that data exchange is not included. -R9 - for clarity, the wording '... within 2 hours' should be replaced with '... within 2 hours of the unsuccessful test'. Conforming change required to M9 as well. -R10 - for clarity, the wording '... as identified in R1 through R6...' should be replaced with '... with which it is required to have Interpersonal Communications capability or Alternative Interpersonal Communication capability...'. -M6 - the term 'Adjacent' needs to be capitalized in the last sentence of the paragraph as 'Adjacent Balancing Authority' is a NERC defined term. -M7 - 'that' in the first line is repeated -M9 - the wording 'on a monthly basis' should be replaced with 'once per calendar month' to be consistent with the wording of the R9. -M11 - the words 'that experiences a failure of any of its Interpersonal Communications capabilities' should be added after Operator to be consistent with the wording of the Requirement -Compliance - 1.3 bulleted sentences - the term 'historical data' should be removed. The term 'evidence' is sufficiently descriptive and is consistently used in other requirements -Data Retention (1.3) - The data retention requirements are too uncertain for two reasons. First, the requirement to 'provide other evidence' if the evidence retention period specified is shorter than the time since the last audit introduces uncertainty because a responsible entity has no means of knowing if or when an audit may occur of the relevant standard. Secondly, it is unclear what 'other evidence' besides the specified logs, recordings and emails, an entity may be asked to provide to demonstrate it was compliant for the full time period since their last audit. This comment also applies to COM-002-3 and IRO-001-3. -Data Retention (1.3) - COM-002-3 requires that voice recordings are kept for the most recent 3 calendar months but COM-001-2 requires that they be kept for the most recent 12 calendar months. Manitoba Hydro does not see the reliability benefit of storing voice recordings for longer than 3 months and suggests that voice recordings be removed as evidence for COM-001-2. Evidence of the availability of Interpersonal Communications and Alternative Interpersonal Communications can be demonstrated using the other forms of evidence listed. -VSLs (general comment) - for clarity, use for example R1.1 and R1.2 to refer to requirements instead of Part 1.1 and Part 1.2. -VSL R4 - a reference to R4.3 is missing COM-002-3 -Title - to capture the purpose and intent of the standard, the title should be changed to 'Emergency Communications'. -R2 - for clarity, the words 'back to the sender' should be added to the end of the sentence -R3 - for clarity, the words 'to the recipient' should be added to both of the bulleted sentences after 'confirm' and 'reissue'. The words 'evident from the response' should be added to the end of the second bulleted. -A question for the drafting team: has it been discussed whether there should be an additional requirement which indicates that the Reliability Coordinator, Transmission Operator and Balancing Authority shouldn't take any action in a Reliability Directive until such time as it has been confirmed accurate by the sender? If so, does the team feel that it's a worthwhile requirement to consider? -M2 - the words 'restate, rephrase or recapitulated' should be added after 'repeated' to be consistent with wording of the requirement. -M3 - the words 'to show' should be deleted from the end of this paragraph. IRO 001-3 -Purpose - the words 'to the Bulk Electric System' already appear in the definitions of Emergency and Adverse Reliability Impact and do not need to be repeated here. -Effective Date - the effective date should be changed to the 2nd calendar quarter following BOT approval in jurisdictions not requiring regulatory approval to be consistent with jurisdictions requiring regulatory approval. -General comment - There are repeated references to 'identified events' - it is not clear what this is referring to. M1 - M1 refers to Adverse Reliability Impacts 'within its Reliability Coordinator Area'. The requirement does not refer to 'within its Reliability Coordinator Area' - the wording in the measure and in the requirement should be consistent. -M2 - missing the word 'physically' when describing that a direction could not be implemented, should be consistent with the wording in the requirement. -Compliance - the entire section needs to be updated as it refers to requirements and measures that don't exist. -VSLs R2 - the reference to 'fully comply' is very vague. It is only a violation if the entity does not fall within the exception. - R2 VSL - For clarity, change 'RC's directive' to 'Reliability Coordinator's Reliability Directive'.
Group
Southern Company
Antonio Grayson
Yes
No
We are concerned regarding communications between Transmission Operators on opposite ends of DC ties which may or may not be in the same interconnection. Similarly, COM-001, R1.2 limits the requirement of adjacent Reliability Coordinators to the same interconnection and this should not be limited to the same interconnection whether it is synchronous or non-synchronous. The measures should also be verified to ensure that they align properly with the final requirements.
Yes
We suggest that this phrase should also be removed from the "Purpose" statement.
No
We suggest the following changes: 1. Requirement 10 should include Distribution Providers and Generator Operators, 2. Entities to be notified should be "as identified in requirements R1 through R8", 3. Requirement 11 should be deleted, and, 4. Measures (M10) and VSLs should be adjusted accordingly.
No
This definition would encompass more communication than is now included. The definition now requires that a directive be declared as a part of the three part communication. For example, sending out the voltage schedule each morning would be included as a directive using the new definition. We suggest adding the words "and identified as a reliability directive to the recipient" at the end of the definition of Reliability Directive. This would allow the removal of R1 from COM-002-3
We question why the first paragraph of Section 1.3 - Data Retention has been included in each of these three standards. We suggest that it should be removed from each standard. We suggest the drafting team look at Standard EOP-008, Requirements R3 and R8 and add appropriate language in Standard COM-001-2, to avoid instantaneous non-compliance for loss of Interpersonal Communications and/or alternate interpersonal communications (R1 and R2). COM-001-2 Dominion VP: COM-001-2, M9 reads "at least on a monthly basis". Dominion suggests that this be changed to "at least once per calendar month" as written in R9. This change should also be corrected in the VSLs. M8 - We suggest removing the second "that" in the first sentence of the measure. M10 - Dominion suggests this be revised to coincide with changes made in R10 (deleting impacted and adding as identified in Requirements R1 through R6), therefore M10 should read: "Each Reliability Coordinator, Transmission Operator, and Balancing Authority, shall have and provide upon request evidence that it notified entities as identified in Requirements R1 through R6 within 60 minutes of the detection of a failure of its Interpersonal Communications capabilities that lasted 30 minutes or longer. Evidence could include, but is not limited to dated operator logs, dated voice recordings or dated transcripts of voice recordings, electronic communications, or equivalent evidence. (R10.) * M12 needs to be removed. Southern: Definition of Alternative Interpersonal Communication: Any Interpersonal Communication that is able to serve as a substitute for, and does not utilize the same infrastructure (medium) as, Interpersonal Communications used for day-to-day operation. Comments: • The proposed definition uses the term "medium". What is the scope of that? Telephony is a "medium" but there is wired, wireless, satellite, etc. Was "medium" intended to differentiate voice, paper, text, email, teletype, or something else? • Similar to that last question - does the qualifying term "same" when modifying infrastructure mean something like voice versus written? What about situations where the primary telephone system is Voice Over Internet Protocol (VOIP) and it is using the same computer network infrastructure as an email or messaging system. That is the "same infrastructure" but a different "medium" R1 Each Reliability Coordinator shall have Interpersonal Communications capability with the following entities: Comments • In later requirements it is proposed that the entity "...shall designate an...". It is suggested that for consistency and auditability, this concept be used for R1, R3, R5, R7 and R8. In addition, the qualifier of "primary" should be used such that the requirements read "...shall have designated, primary Interpersonal Communications capability with the following entities." Although it is appropriate that "Alternative" be capitalized since it is used in a defined term (i.e. Alternative Interpersonal Communication) that bounds acceptable alternative methods, we do not see the need to capital "primary". R9 Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall test its Alternative Interpersonal Communications capability at least once per calendar month. Comments • The requirement is unclear if the required monthly test is a general functionality test or if there is the expectation of testing the designated Alternative Interpersonal Communications with all of the entities defined in the subrequirements of R2, R4, and R6. • There is no expectation of testing the primary Interpersonal Communications is this intentional or an oversight? Although functional testing of this should be done as a normal course of business, should an explicit test be required with each entity in the subrequirements of R1, R3, R5, R7 and R8 to insure, for example, that all the phone numbers are correct? R10 Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall notify entities as identified in Requirements R1 through R6 within 60 minutes of the detection of a failure of its Interpersonal Communications capabilities that lasts 30 minutes or longer. Comments • The following scenario seems plausible: The Interpersonal Communications fails and is detected at 14:00 and gets fixed at 14:35. It lasted more than 30 minutes but is fixed. As written the requirement would require the responsible entity to notify entities identified in R1 through R6 by 15:00 (i.e. 60 minutes from detection) even though the problem no longer exists. Is that the expectation? General Question • Does COM-001 apply only to primary control centers or back-ups, per EOP-008, as well? COM-002-3 Southern R1 When a Reliability Coordinator, Transmission Operator or Balancing Authority requires actions to be executed as a Reliability Directive, the Reliability Coordinator, Transmission Operator or Balancing Authority shall identify the action as a Reliability Directive to the recipient. Comment • It is recommended that the requirement be clarified that the Reliability Directive be identified as such during its delivery. (e.g. "...shall identify the action as a Reliability Directive to the recipient during its delivery.") R2 Each Balancing Authority, Transmission Operator, Generator Operator, and Distribution Provider that is the recipient of a Reliability Directive shall repeat, restate, rephrase or recapitulate the Reliability Directive. Comment • It is recommended that the requirement be clarified that an entity receiving a Reliability Directive repeat, restate, rephrase or recapitulate it immediately upon receiving it. (e.g. "...shall shall repeat, restate, rephrase or recapitulate the Reliability Directive immediately upon receiving it.") As written, there is not limit as to when the entity must repeat it (i.e. they could wait 2 hours) General Question • The Standard is not clear as to what each entity is to do when more than one entity receives a Reliability Directive at the same time (e.g. during a RC area teleconference call) . Is, for example, a roll call of receiving entities expected to be held so that they individually can repeat, restate, rephrase or recapitulate the Reliability Directive followed by Individual confirmation required in R3? IRO-001-3 Dominion VP R2 - Dominion questions the phrase "physically implemented" and recommends that the intent be clarified in the language. Dominion notes the following comment and response posted under Consideration of Comments on Initial Ballot - Reliability Coordination (Project 2006-06) Date of Initial Ballot: February 25 - March 7, 2011: "IRO-001 R2, R3, and R4 have replaced "Directives" with the word direction in lower case (while it appears that "Directives" is a subset of "directions"). We believe that this muddies the waters and could bring numerous conversations and dialog into scope unnecessarily. The end result is that the RC has the right to issue and use "Directives" and anything short of this could just be communications. For example, a number of entities that are Reliability Coordinators also facilitate energy markets. There are many communications related to markets that probably should be out of scope with respect to the standards. Furthermore, it might not be clear what role (eg Reliability Coordinator, market operator, etc) the staff at these entities are fulfilling. Response: IRO-001 is written to cover both typical daily operating scenarios and also emergency scenarios. The required performance encompasses issuing and responding to Reliability Directives as well as other directions. The requirement language specifically ties back to Requirement R2 which states that the RC "shall take actions or direct actions, which could include issuing Reliability Directives, ". This is the "direction in accordance with Requirement R2" stated in R3 and the "direction in accordance with Requirement R3" stated in R4." Dominion believes the entity's comments remain valid and the response provided by the SDT does not address all aspects of the concern. Dominion suggests that the language be changed to "Reliability Directive" consistent with COM-002. M2 - need to add the following words "compliance with, physically, unless" which were included in R2, therefore M2 should read "Each Transmission Operator, Balancing Authority, Generator Operator, Interchange Coordinator and Distribution Provider shall have and provide evidence which may include, but is not limited to dated operator logs, dated records, dated and time -stamped voice recordings or dated transcripts of voice recordings, electronic communications, or equivalent documentation, that will be used to determine that it complied with its Reliability Coordinator's direction(s) per Requirement R1 unless compliance with the direction per Requirement R1 could not be physically implemented or unless such actions would have violated safety, equipment, regulatory or statutory requirements. In such cases, the Transmission Operator, Balancing Authority, Generator Operator, Interchange Coordinator or Distribution Provider shall have and provide copies of the safety, equipment, regulatory or statutory requirements as evidence for not complying with the Reliability Coordinator's direction. (R2) Section 1.3, the second bulleted, need to add calendar to 12 calendar months Southern General recommendation • It is recommended that where the verb "direct/directed" or noun "direction" is used in Purpose, R1, R2 and R3, that it be replaced with the verb "instruct/instructed" or noun "instruction", as appropriate. This would help the industry avoid confusion often referred to as "big D" or "little d" directives. It is noted that the term "Reliability Directive" does that to a great degree but avoiding the verb/noun "direct/direction" would augment the difference. R1 Each Reliability Coordinator shall have the authority to act or direct others to act (which could include issuing Reliability Directives) to prevent identified events or mitigate the magnitude or duration of actual events that result in an Emergency or Adverse Reliability Impacts. Comment • At what point in time is "identified" referring to in "...to prevent identified events or..." Is it referring to current or future events? One might assume both since the "Time Horizon" is defined as Real-time Operations, Same Day Operations and Operations Planning but the requirement may be enhanced if explicitly stated ("...to prevent events identified in real-time or in the future or to mitigate the magnitude..."). • For clarity, the scope of the authority should be limited to the Reliability Coordinator Area ("...that result in an Emergency or Adverse Reliability Impacts within its Reliability Coordinator Area"). As written, it implies the authority should extend outside its RC Area. R2 Editorial comment - The words "compliance with" are in a different font in the posted version. R3 Each Transmission Operator, Balancing Authority, Generator Operator, and Distribution Provider shall inform its Reliability Coordinator upon recognition of its inability to perform as directed in accordance with Requirement R2. Comment The requirement states the responsible entities shall "inform" its RC when unable to perform as directed but it is unclear when the notification needs to take place. Although the term "as soon as practicable" may seem be unmeasurable, as written now there is no time deadline to perform the notification - i.e. it could be 4 hours later after recognition.

Group
PPL Electric Utilities and PPL Supply NERC Registered Organizations
Annette M. Bannon
No
PPL has concerns with the use of the word "any" in this requirement. PPL recommends striking the words "any of" and instead using "Its primary" as follows: Each Distribution Provider and Generator Operator that experiences a failure of its primary Interpersonal Communication capabilities with its Transmission Operator or Balancing Authority...". In the current version, it is unclear when the DP and GOP are required to consult with their TOP or BA. "[A] failure of any of its Interpersonal Communication capabilities" could be construed to mean an internal phone line of either the DP or GOP failing. Internal phone lines do not affect either the DP's or the GOP's ability to communicate with the TOP or BA. It is also unclear whether a failure of an interpersonal communication capability would require consultation if there were multiple other interpersonal communication capabilities that were still fully functional.
Individual
Michael Brytowski
Great River Energy
Yes
No
"to exchange interconnection and operation information" was removed from the requirements in COM-001-2 but remains in the purpose. For consistency it needs to be removed. It could read "To establish Interpersonal Communication capabilities for the exchange of information necessary to maintain reliability."
No
Capability is not used consistently in R7 and R11. It changes from singular to plural.
In IRO-001-3 "authority" should be removed and the verbage returned to "shall act." In COM-002-3 R2 and in Applicability we suggest removing the Distribution Provider as the RC would not likely give a Reliability Directive to a Distribution Provider. The Reliability Directive would more likely come from the Transmission Operator to the Distribution Provider. In COM-002-3 R3 we suggest replacing "Reissue" with "Restate." You are not technically reissuing the Reliability Directive.
Individual
David Burke
Orange and Rockland Utilities, Inc.
Yes
Yes
Yes
Regarding COM-002 Requirement R1, we recommend that this requirement be reworded as follows: "When a Reliability Coordinator, Transmission Operator or Balancing Authority requires actions to be executed as a Reliability Directive, the Reliability Coordinator, Transmission Operator or Balancing Authority shall require that the Reliability Directive be communicated using three-part communications as described in Requirements R2 and R3 of this standard". The reason for this recommended rewording are threefold: 1. Good operating practice calls for use of three-part communications at all times. The recommended re-write encourages the use of the good operating practice of three-part communications at all times, but does not require it. 2. It is not good operating practice to require that an additional (unnecessary) phrase be used during emergency situations. During emergency situations, it is best to use standard operating protocols so as to limit unnecessary burdens on operating personnel during critical and stressful times. 3. By implementing the proposed new R1 requirement, it would effectively weaken the need for rigorous compliance with any and all directives issued by the RC's, TO's or BA's. Regarding IRO-001 Requirement R1, we recommend that the current requirement R3 be reinstated as the new requirement R1. That is, the new requirement R1 should read as follows: R1. The Reliability Coordinator shall have clear decision-making authority to act and to direct actions to be taken by Transmission Operators, Balancing Authorities, Generator Operators, Transmission Service Providers, Load-Serving Entities, and Purchasing-Selling Entities within its Reliability Coordinator Area to preserve the integrity and reliability of the Bulk Electric System. These actions shall be taken without delay, but no longer than 30 minutes. We do not support any further dilution of Reliability Coordinator authority to enforce Reliability Directives through deletion of the 30 minute maximum response time period. The timely actions in response to any Reliability Coordinator issued Reliability Directives is an essential part of the process.
Group
SPP Standards Review Group
Robert Rhodes
Yes
Yes
We concur with the addition of "Adjacent" but ask that the SDT give some consideration to allowing an exemption in R6.3 for relatively small loads, less than 20 MW, that are pseudo tied into a Balancing Authority. Loss of these facilities would not place a burden on the BES and should not require Alternative Interpersonal Communications capabilities.
Yes
No
We would suggest deleting the phrase "any of" in the Requirement. It would then read "Each DP and GOP that experiences a failure of its Interpersonal Communication...". Also, how does the DP or GOP consult with its TOP or BA when it loses its Interpersonal Communications capability? To do this wouldn't they have to have an Alternative Interpersonal Communications capability?
Yes
COM-001-2: Requirement 10 is too open ended as written. The measure, M10, indicates that only impacted entities need to be notified. The requirement should be changed to make it consistent with the measure. The requirement would then read "Each RC, TOP And BA shall notify impacted entities as identified...". Requirements 3 and 5 places the responsibility for establishing Interpersonal Communication capability on the TOP and BA. It is quite conceivable that a TOP or BA may not know all, or newly, registered DPs and GOPs in its respective area. In Requirements 7 and 8, the DP and GOP, respectively, are in turn responsible for establishing Interpersonal Communication capability. The TOPs/BAs and the DPs/GOPs should not be responsible for this. The DPs and GOPs should be held accountable for requesting that capability of their TOP and BA. Therefore, we suggest adding the following phrase at the end of Requirements 3.3, 3.4, 5.3 and 5.4 – "that has requested Interpersonal Communications capability." Then R3.3 would read "Each Distribution Provider within its Transmission Operator Area that has requested Interpersonal Communications capability." COM-002-3: Requirement 2/Measure 2: There is an inconsistency between the requirement and the measure. The requirement allows the recipient to repeat, restate, rephrase or recapitulate the directive. Measure 1 only mentions repeating the directive.
Group
Dominion
Mike Garton
Yes
Yes
Yes
Yes
Dominion agrees with the intent of R11; however, suggest language changes for consistency with R10 as follows: R11. Each Distribution Provider and Generator Operator that experiences a failure of any of its Interpersonal Communication capabilities shall consult with their Transmission Operator or Balancing Authority as applicable to determine a mutually agreeable time to restore the Interpersonal Communication capability. [Violation Risk Factor: Medium][Time Horizon: Real-time Operations]
Yes
COM-001-2: M9 reads "at least on a monthly basis", Dominion suggests that this be changed to "at least once per calendar month" as written in R2. M8 Dominion suggests removing the second "that" in the first sentence of the measure. M10 Dominion suggests this be revised to coincide with changes made in R10 (deleting impacted and adding as identified in Requirements R1 through R6), therefore M10

Individual
Neil Phinney
Georgia System Operations
No
While we agree with removing LSE, PSE, and TSP, we do not agree with the need to include Distribution Provider in all the standards. For example, in IRO-001-3, the Distribution Provider will likely never receive a Reliability Directive directly from its Reliability Coordinator. More likely, the Reliability Directive will be issued by the Transmission Operator or Balancing Authority depending on if the issue is security or adequacy related. Accordingly, NERC's Reliability Functional Model V5 describes and identifies the DP's relationships with other Functional Entities to the TOP and BA with respect to Real Time. Real Time 7. Implements voltage reduction and sheds load as directed by the Transmission Operator or Balancing Authority. 8. Implements system restoration plans as coordinated by the Transmission Operator. 9. Directs Load-Serving Entities to communicate requests for voluntary load curtailment.
Yes
No
: The intent of this requirement is not yet clear. Technically, the air we breathe, as well as other mediums like "any" cell phone, fax lines, and/or email accounts would qualify under this proposed definition of Interpersonal Communication. The burden for compliance evidence to demonstrate failure of "any of its Interpersonal Communication capability" would seem unobtainable and could prove to be a daily occurrence (dropped phone calls, etc.). The following is suggested: R11. Each Distribution Provider and Generator Operator that experiences a failure of any of its Interpersonal Communication capability shall consult with their Transmission Operator or Balancing Authority as applicable to determine a mutually agreeable time to restore the Interpersonal Communication capability.
Yes
Requirement R1 should require the use of Reliability Directives. The requirement compels the Reliability Coordinator "to direct others to act to prevent identified events or mitigate the magnitude or duration of actual events that result in an Emergency or Adverse Reliability Impact". Reliability Directives are necessary to address Adverse Reliability Impacts or Emergencies and trigger the use of three-part communications identified in COM-002-3. COM-002-3 R1 really compels the Reliability Coordinator to use a Reliability Directive for Emergencies and Adverse Reliability Impacts with the opening clause: "When a Reliability Coordinator, Transmission Operator, or Balancing Authority determines actions need to be executed as a Reliability Directive". What else could be more important for a Reliability Coordinator to issue a Reliability Directive than for an Emergency or Adverse Reliability Impact? Thus, not requiring the use of Reliability Directives for Adverse Reliability Impacts and Emergencies makes IRO-001-3 R1 and COM-002-3 R1 inconsistent. It is recommended that the treatment of Reliability Directives shall be consistent with those being developed for TOP-001-2 as proposed by the Real-Time Operations drafting team (Project 2007-03). As such, consider using the following language for R2: "Each TOP, BA, and GOP shall comply with each identified Reliability Directive issued and identified as such by its RC, unless such actions would violate safety, equipment, regulatory, or statutory requirements." Accordingly, please consider using the following language for R3: "Each TOP, BA, and GOP shall inform its RC of its inability to perform an identified Reliability Directive issued by that RC." Again, we do not believe the DP would receive an identified Reliability Directive directly from the RC and the DP applicability should be removed from this standard. The DP is appropriately captured under COM-002 and TOP-001 with respect to Reliability Directives. Accordingly, NERC's Reliability Functional Model V5 describes and identifies the DP's relationships with other functional entities to TOP and BA with respect to Real Time. Real Time 7. Implements voltage reduction and sheds load as directed by the Transmission Operator or Balancing Authority. 8. Implements system restoration plans as coordinated by the Transmission Operator. 9. Directs Load-Serving Entities to communicate requests for voluntary load curtailment. The following comments are regarding COM-001-2. The SDT should include an additional qualifier to Interpersonal Communications within the context of these requirements, for example (operational or dispatch center communications??). Technically, the air we breathe, as well as other mediums like "any" cell phone, fax lines, and/or email accounts would qualify under this proposed definition of Interpersonal Communication. Assuming at least one employed individual can speak, all entities could demonstrate compliance of this capability at all times, therefore, it is not clear the intent of these requirements are accurately being presented. It is recommended to include the use of "signed attestation letters" as examples of evidence under M4 and M11 and other measures as appropriate.
Group
FirstEnergy
Sam Ciccone
Yes
Yes
Yes
No
Although we agree with the intent of the requirement, we are concerned with the use of "any of its Interpersonal Communication". The word "any" is very inclusive and the team should consider narrowing it down to those capabilities that may adversely impact reliability.
Yes
Definition of Interpersonal Communications - We understand that the team does not want to be prescriptive as far as the specific types of communication mediums since we live in an age of many forms of communication. But in this case it may be helpful to give examples in the definition. An auditor may interpret Interpersonal Communication to strictly include voice-related and two-way conversations. Depending on the circumstances, other mediums may be adequate, such as blast calls or instant messaging. This should be clarified in the definition. COM-001-2 - In R9, it should be clear that the 2 hour timeframe is for initiation of corrective action because mitigation may take much longer. We suggest the last sentence of R9 state: "If the test is unsuccessful, the responsible entity shall, within 2 hours, initiate action to repair or designate a replacement Alternative Interpersonal Communications capability." - In R10, the phrase "R1 through R6" should state "R1 through R8". COM-002-3 - In R2, the use of the term recapitulate may not be appropriate. This term means "to summarize" the directive. Three-part communication during emergency situations should assure that the essential details of the directives are understood and a summary may inadvertently leave out important information. - The effective date of COM-002-3 should be consistent with COM-001-2 and IRO-001-3 and state "the 1st calendar day of the 2nd calendar quarter". It currently shows the "1st calendar quarter in the standard and implementation plan. IRO-001-3 - The third bullet under Data Retention addresses requirement R4 and measure M4 neither of which exist in the standard. - In R1, the word "and" is missing between Generator Operator and Distribution Provider. - VSL for R2 - "NA" should be removed from the High VSL - Furthermore, the VSL should include language for instances when the entity cannot meet the RC's directive as afforded by R2.
Individual
Michelle D'Antuono
Ingleside Cogeneration LP
Yes
Ingleside Cogeneration LP believes that the intent of these three standards is to ensure reliable normal and emergency communications between BES operating entities. It should be the rare exception that BES-critical information must be communicated directly to an LSE, PSE, and TSP and IC. The impact of the Standards would be lessened if diffusely applied to multiple entities who do not normally engage in operations communications.
No
In the background section of this ballot, the project team indicates that the removal of the phrase is intended to signal that these requirements do NOT apply to the exchange of data. Although Ingleside Cogeneration LP agrees that the phrase is not a helpful description of the need for inter-entity communications - and should be removed - we do not see how the remaining language achieves the project team's purpose. It seems the confusion stems from the multitude of data communication types. Email messages between operating entities may be a valid communications path under COM-001-2, while telemetry/control is covered under other Standards. We believe that a technical guideline may be an appropriate vehicle to distinguish what types of communications are subject to these requirements, and which are not.
No
Most of Ingleside Cogeneration's communications capabilities rely on carriers who will immediately deploy technicians to repair land-based or wireless systems when they break. Although we may contact the carrier to inform them that the systems are not available - or to determine their progress - we do not want them waiting for our go-ahead before proceeding. If the intent of this requirement is to validate the operation of the repaired connection, or to establish interim means of communications with other operating entities, then Ingleside Cogeneration believes a re-write is in order. There is no reliability purpose being served otherwise that we can tell.
Yes
Ingleside Cogeneration agrees that it is important to clearly denote when a directive must be issued. In previous definitions, we believed that imprecise language made it difficult for the BA, RC, or TOP to determine if a gray area situation required a directive or not. With a more precise definition, it will eliminate second guessing by auditors that a directive was necessary because an outcome turned out poorly - even if an Emergency was not declared or an Adverse Reliability Impact did not occur.
Ingleside Cogeneration LP is concerned that the entity-to-entity organization of the COM Standards is quickly being outdated by voice and video conferencing or one-to-many broadcasts. In addition, email may be a preferred mode of most communications to and from small Generator Operators. It is not clear that these technologies are precluded from consideration by COM-001 and COM-002 - which means that some auditors may believe that they are. This leads to inconsistent application of the compliance criteria, and may discourage the use of some powerful technologies. It appears to us that some technical guidelines would be appropriate to help entities and auditors decide which are applicable under these Standards.
Group
MISO Standards Collaborators
Marie Knox
Yes
(1) In COM-001, the entities in R4 and R6 (now R5 and R6) should be the same, i.e. the BA needs to have the Interpersonal Communication capability as well as the Alternative Interpersonal Communication capability with the same entities. Although the need to have Alternative Interpersonal Communication capability should be assessed from the viewpoint that whether or not the absence of such capability can adversely affect reliability, the proposed standard does not require the capability in all cases. At the same time, this standard does not preclude such capability. Even though Interpersonal Communication capability is needed between a BA and a DP/GOP to communicate reliability instructions or directives, there are other communications paths which can be used in the case of the loss of that capability. Since TOPs are also required to have the capability, the BA can call the TOP and ask the TOP to contact the DP/GOP for them until they can implement capability. In addition, it is difficult to visualize entities which would not have the public telephone system or even cell phones available for use in the event of the loss of the capability.
Yes

(1) We agree with the addition of "Adjacent" entities in the quoted parts. However, there are some entities which may need the capability even though they are not "synchronously connected within the same interconnection". This standard does not require them to have the capability, but it does not preclude such capability. In these cases, those entities should evaluate whether the need for the capability is a reliability need or market coordination. If the entities were connected synchronously, actions taken by an entity could have immediate effect upon other entities. However, if not synchronously connected, changes in flows across the asynchronous ties would have to follow the interchange scheduling process with approval by all involved entities before changes could be enacted. Some TOPs do communicate with other TOPs even in another Interconnection (e.g. between Quebec and all of its asynchronously interconnected neighbors). (2) Measure M3 does not cover the added R3.5 condition (having Interpersonal Communications capability with each adjacent TOP). M3 needs to be revised.
Yes
We urge the SDT to remove the phrase. If necessary, regional situations can be addressed by a regional variance.
Yes
Yes
The Data Retention Section in IRO-001 does not reflect the revised requirements. For example: the Electric Reliability Organization is no longer a responsible entity; the Reliability Coordinator should replace the ERO for keeping data for R1; Transmission Operator, Balancing Authority, Generator Operator and Distribution Provider should replace the Reliability Coordinator for keeping data for R2; and there is no R4/M4. Additional comments associated with COM-002 We are concerned with the use of "shall" in the measurement sections. "Shall" statements should only be used in the Requirements, as these are the only enforceable items in the standard. The measures should not limit how we show compliance. If there are specific issues that the drafting team is proposing to be a requirement, they should be added to the requirements section of the standard. Measurement M1 should also allow entities to develop procedures, that are distributed to and trained on, in advance with recipients of directives that meet the requirements for the communication of what constitutes a Reliability Directive. The last sentence in the measurement should be revised to read: "Such evidence could include, but is not limited to, dated and time-stamped voice recordings, dated and time-stamped transcripts of voice recordings, or dated operator logs to show that it identified the action as a Reliability Directive to the recipient or approved procedures that identify what constitutes a Reliability Directive and when Reliability Directives are issued." (R1) The Data Retention section states: "For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit." It is unclear on how an entity would be expected to provide evidence beyond 3 months when requested if the data retention period and established procedures do not require the evidence to be retained. The SDT should provide examples of what other types of evidence could be expected or the phrase should be removed.
Group
Florida Municipal Power Agency
Frank Gaffney
Yes
In COM-001-2 R5.3, should a BA have communications with a DP or LSE? For the TOP, it is the DP because the load influence is very local; however, for a BA the supply / demand balance is not local and in markets that allow retail competition, it may be that the LSE is the more appropriate functional entity. For instance, the Functional Model when discussing LSE on page 55 states that one of the LSE's real time duties is: "12. Receives requests from the Balancing Authority and Distribution Provider for voluntary load curtailment." If the LSE is the more appropriate entity, then R7 would need to be changed and a new requirement specific to LSE's would need to be added. For Florida, which does not have retail competition, it doesn't matter whether the DP or the LSE is more appropriate; hence, the "yes" answer.
Yes
Yes
No
By use of the term "any" in the phrase "a failure of any of its Interpersonal Communication" the standard will actually create a disincentive for redundant communications with DPs and GOPs due to compliance risk. To truly further the goals of reliability, the requirement should align with R3.3 and R3.4 which requires a primary Interpersonal Communications capability and R4 which does not require DPs or GOPs to have Alternative Interpersonal Communications capability. A possible solution is through use of the terms "Primary" for R3 and "Alternate" for R4 and then make R11 applicable to Primary only.
Yes
In the definition of Interpersonal Communication, the use of the word "medium" is ambiguous. Suggestions for alternatives: "system", "channel". COM-001-2, R1 and R3, the phrase: "have Interpersonal Communications capabilities", what if the communication system fails? Is that an immediate non-compliance (especially R3.3 and R3.4 which do not require a redundant system). Suggest using EOP-008 type of language to allow restoration of failed equipment without non-compliance. COM-001-2 R9 - "Each... shall test its Alternative Interpersonal Communications capability", suggest adding the phrase "to each entity for which Alternative Interpersonal Communications is required" to add clarity. In addition, the type of testing is unclear and ambiguous. There is also ambiguity in the terms "direct", "directive", "direction" and "Reliability Directive". The SDT may want to consider using the terms "instruct" and "instruction" in place of "direct", "directive", "direction" to more clearly distinguish from a Reliability Directive.
Individual
Greg Rowland
Duke Energy
Yes
Yes
However, we believe that the phrase "synchronously connected within the same Interconnection" should be struck, because TOPs are controlling DC ties and should be required to have communications with each other.
Yes
However, the definition of Interpersonal Communication should also be expanded to clearly include the drafting team's intent that the capability is NOT for the exchange of data. The phrase "for the exchange of Interconnection and operating information" should also be struck from the Purpose statement.
No
The phrase "consult with... to determine a mutually agreeable time" makes this requirement too open-ended to be auditable and enforceable. We question why R11 does not establish a timeframe for notification similar to R10, which requires the RC, TOP or BA to make notification within 60 minutes of failure detection. We also question why DPs and GOPs are not required to have Alternative Interpersonal Communications capability in order to be able to make such notifications.
No
• Since FERC has not yet approved the new definition of Adverse Reliability Impact, we believe the term "Adverse Reliability Impact" should be replaced by the words of the BOT-approved definition: "the impact of an event that results in Bulk Electric System instability or cascading". • Also, add the phrase "and the communication is identified as a reliability directive to the recipient" to the end of the definition of Reliability Directive. This will eliminate potential confusion regarding when a communication is a Reliability Directive, and when a communication is a routine instruction. Revising the definition in this manner may also eliminate the need Requirement R1 of COM-002-3. If R1 is retained, we suggest rewording as follows: "Each Reliability Coordinator, Transmission Operator, or Balancing Authority shall identify a Reliability Directive to the recipient when it issues a Reliability Directive that requires an action or actions to be executed." • Proposed reworded definition: "Reliability Directive: A communication initiated by a Reliability Coordinator, Transmission Operator, or Balancing Authority where action by the recipient is necessary to address an Emergency or the impact of an event that results in Bulk Electric System instability or cascading, and the communication is identified as a Reliability Directive to the recipient."
• COM-001-2 does not specify how much time an entity is allowed to restore failed Interpersonal Communications capability or failed Alternative Interpersonal Communications capability. R1 through R6 require that the RC, TOP and BA have both. R7 and R8 require that DPs and GOPs have Interpersonal Communications capability. An auditor could find an entity non-compliant with these requirements upon failure of either capability. R9, R10 and R11 specify actions to take upon failure, but do not relieve entities of responsibility under R1 through R8. • COM-001-2 R9, M9 and VSLs – M9 and VSLs should be revised to be consistent with wording of R9 phrase "at least once per calendar month". • COM-001-2 R10, M10 and VSLs – Clarity is needed regarding when the 60-minute clock starts. For example, suppose a failure is detected immediately upon occurrence of the failure. Does the 60-minute clock start immediately, or after the failure has lasted 30 minutes? When does the 60-minute clock start if a failure is detected and the entity is unsure when it occurred? • COM-001-2 R10, M10 and VSLs – If the failure only lasts for 35 minutes, it appears that the RC, TOP or BA is still required to notify entities identified in R1 through R6. Is this the drafting team's intent? • COM-001-2 R10, M10 and VSLs – Should be revised since the RC, TOP and BA are only required to have Alternative Interpersonal Communications capability with other RCs, TOPs and BAs per R2, R4 and R6. Suggested rewording for R10: "Each Reliability Coordinator, Transmission Operator and Balancing Authority shall notify entities with which it is required to have Alternative Interpersonal Communications capability as identified in R2, R4 and R6 within 60 minutes of the detection of a failure of its Interpersonal Communications capabilities that lasts 30 minutes or longer." • COM-001-2 M11 and VSL – Replace the word "their" with the word "its". • COM-001-2 Data Retention – The way Data Retention is being enforced, this whole section could just be reduced to a blanket statement that an entity must be able to provide evidence that it has been in compliance since its last audit. • COM-002-3 R2, M2 and VSL – Replace "and" with "or". Also, the phrase "repeat, restate, rephrase or recapitulate" seems excessive and may be intended to avoid a violation where an entity fails to repeat the Reliability Directive word for word. Suggested rewording: "Each Balancing Authority, Transmission Operator, Generator Operator or Distribution Provider that is the recipient of a Reliability Directive shall repeat the Reliability Directive back to the issuer with sufficient accuracy so that understanding can be confirmed." • COM-002-3 R3, M3 - Replace "and" with "or". • IRO-001-3 – We believe that the Purpose and the Requirements of this standard should be focused solely on situations where the Reliability Coordinator issues Reliability Directives to prevent an Emergency or Adverse Reliability Impact. • IRO-001-3 – The Purpose should be rewritten as follows: "To establish the authority of Reliability Coordinators to issue Reliability Directives to other entities to prevent an Emergency or the impact of an event that results in Bulk Electric System instability or cascading." • IRO-001-3 – R1 should be rewritten as follows: "Each Reliability Coordinator shall have authority to act or to issue Reliability Directives to others, including but not limited to the Transmission Operator, Balancing Authority and Generator Operator within its Reliability Coordinator Area to prevent identified events or mitigate the magnitude or duration of actual events that result in an Emergency or the impact of an event that results in Bulk Electric System instability or cascading." • IRO-001-3 – R2 should be rewritten as follows: "Each Transmission Operator, Balancing Authority, Generator Operator or Distribution Provider shall comply with a Reliability Directive issued by the Reliability Coordinator unless the Reliability Directive cannot be physically implemented or unless such action would violate safety, equipment, regulatory, or statutory requirements." • IRO-001-3 – R3 should be rewritten as follows: "Each Transmission Operator, Balancing Authority, Generator Operator or Distribution Provider shall inform its Reliability Coordinator upon recognition of its inability to comply with a Reliability Directive in accordance with Requirement R2." • IRO-001-3 Measures and VSLs – Should be revised to conform with the above suggested revisions to requirements.
Individual
Kathleen Goodman
ISO New England
Yes

No
ISO-NE does not believe COM-001, in its entirety, is a results-based standards and therefore does not support the draft as written. We believe such "requirements" (i.e. capabilities) should be verified through an entity certification process. Additionally, results-based requirements should be the driver to have the capability to achieve them; on other words, there is no other way to reliably dispatch than to have communications facilities (electronic or voice).
No
ISO-NE does not believe COM-001, in its entirety, is a results-based standards and therefore does not support the draft as written. We believe such "requirements" (i.e. capabilities) should be verified through an entity certification process. Additionally, results-based requirements should be the driver to have the capability to achieve them; on other words, there is no other way to reliably dispatch than to have communications facilities (electronic or voice).
No
ISO-NE does not believe COM-001, in its entirety, is a results-based standards and therefore does not support the draft as written. We believe such "requirements" (i.e. capabilities) should be verified through an entity certification process. Additionally, results-based requirements should be the driver to have the capability to achieve them; on other words, there is no other way to reliably dispatch than to have communications facilities (electronic or voice).
Yes
none
Individual
H. Steven Myers
ERCOT ISO
No
Some concern for removal of LSE in particular from R2 and R3 from current IRO-001-2 R7 for the ERCOT region. ERCOT Region has QSE's that manage Load Resources. There may be some QSEs that are not registered as a GOP that deploy Load Resources. Per the current LSE JRO, QSEs with Load Resources are registered as LSEs. Not requiring them to deploy Load Resource directives could be perceived as a reliability gap created from previous version to this version. PSEs could be removed as long as they fall under BA authority.
Yes
These changes will clarify intentions regarding the undefined term "adjacent".
Yes
Yes
Yes
The definition of Reliability Directive appropriately clarifies the importance of knowing the level of importance of any instructions being issued. If there is no room for variance from the specific action required, or if there is no time to further negotiate or discuss the action required, it is important that the instruction be identified as a Reliability Directive and for such instructions to be followed in a timely fashion. Normal operating instructions typically do not rise to this level of urgency and some variation from the words will not result in unmanageable reliability impacts. Also, there typically may be time for addressing the instructions in more than one way.
Regarding COM-001-2: We are not clear on the time horizon of requirements for COM-001-2. Based upon the purpose statement, it appears that establishment would be ahead of real time. Wording in the requirements could be construed as maintaining at all times vs. establishing communications. The timeline for mandatory/effectiveness may not be acceptable to establish communications with DPs if hardware procurement/projects must take place. Regarding IRO-001-3: We have some concern for the removal of LSE in particular from R2 and R3 from current IRO-001-2 for the ERCOT region. The ERCOT region has QSEs that manage Load Resources. There may be some QSEs that are not registered as a GOP that deploy Load Resources. Per the current LSE JRO, QSEs with Load Resources are registered as LSEs. Not requiring them to deploy Load Resource directives could be perceived as a reliability gap created from the previous version to this version. PSEs could be removed as long as they fall under BA authority. The Data Retention section should be corrected to match the new requirements numbers and elimination of the previous version R1 with ERO. The Version History mentions six requirements retired, but only details five.
Individual
Anthony Jablonski
ReliabilityFirst
Yes
Yes
ReliabilityFirst agrees with adding the term adjacent but is unclear what the term adjacent is referring to. Does it mean directly connected or is it more than one layer out.
Yes
No
ReliabilityFirst believes Distribution Provider and Generator Operator should be added to Requirement R10 and Requirement R11 should be removed. Finite time frames should be prescribed for each Distribution Provider and Generator Operator that experiences a failure of any of its Interpersonal Communication capabilities. ReliabilityFirst believes that the failure of Interpersonal Communication between Distribution Providers/Generator Operators and Transmission Operators/Balancing Authorities could have the same negative effects similar to the failure of Interpersonal Communication by the Reliability Coordinator, Transmission Operator, and Balancing Authority.
No
ReliabilityFirst believes the definition of "Reliability Directive" should be all inclusive and include "all" actions initiated by the Reliability Coordinator, Transmission Operator or Balancing Authority (not just Emergency or Adverse Reliability Impacts). Even though Emergency or Adverse Reliability Impacts are defined, during operations, it may become a gray area to whether or not it falls under the intent of a "Reliability Directive." Furthermore, if the system falls under a condition that results in an Adverse Reliability Impact, it may be too late for a Reliability Coordinator, Transmission Operator or Balancing Authority to issue a Reliability Directive. ReliabilityFirst recommends the following for revision to the term "Reliability Directive": Reliability Directive - A communication initiated by a Reliability Coordinator, Transmission Operator or Balancing Authority where an action by the recipient is required.
Comments on COM-001-2 1. Applicability Section a. RFC recommends adding the Generator Owner to the applicability section of the standard along with corresponding Requirements R8 and R11. ReliabilityFirst believes to maintain system reliability and based on certain business practices in effect, Generator Owners need to be required to have associated Interpersonal Communications with its Balancing Authority and Transmission Operator. 2. Requirement R7 and R8 a. ReliabilityFirst seeks further clarity on why the Distribution Provider and Generator Operator are not required to designate an Alternative Interpersonal Communications capability? Requirements R7 and R8 require the Distribution Providers and Generator Operators to have Interpersonal Communications capability but there is not corresponding requirement to have an Alternative Interpersonal Communications capability. ReliabilityFirst recommends adding two new requirements for the Distribution Provider and Generator Operator to designate an Alternative Interpersonal Communications capability. This will be consistent with how Requirements R1 through R6 are set up. 3. Requirement R9 a. Assuming new requirements for the Distribution Provider and Generator Operator to designate an Alternative Interpersonal Communications capability (based on previous comment) are added to the standard, the Distribution Provider and Generator Operator will need to be added to Requirement R9 to test its Alternative Interpersonal Communications capability at least once per calendar month. 4. Requirement R10 a. Based on the ReliabilityFirst comment submitted for Question 4, ReliabilityFirst believes the Distribution Provider and Generator Operator should be included in Requirement R10. b. Since Interpersonal Communications capabilities is a very important piece of operating the BES in a reliable manner, ReliabilityFirst believes the timeframe in which an entity is required to notify the entities is too long. ReliabilityFirst recommends the following language for Requirement R10: i. Each Reliability Coordinator, Transmission Operator, Balancing Authority, Distribution Provider and Generator Operator shall notify entities as identified in Requirements R1 through R8 of a failure of its Interpersonal Communications capabilities that lasts 15 minutes or longer. The notification shall be made within 30 minutes of the detection of a failure. 5. VSLs for Requirement R1 through R8 a. ReliabilityFirst suggest gradating the VSLs for R1 through R8. Listed below is an example of how to grade the VSL for R1. The same type of approach could be used for R2 through R8 as well. i. High VSL- the Reliability Coordinator failed to have Interpersonal Communications capability with one or more of the entities listed in Parts 1.1 and 1.2. ii. Severe VSL - The Reliability Coordinator failed to have Interpersonal Communications capability with one or more of the entities listed in Parts 1.1 and 1.2. 6. VSL for Requirement R9 a. For consistency with the requirement language, ReliabilityFirst recommends adding the words "at least on a monthly basis" to the Lower, Moderate and High VSLs and adding the words "if the test was unsuccessful" to the end of the Lower, Moderate and High VSLs. Listed below is an example of the Lower VSL. i. The responsible entity tested the Alternative Interpersonal Communications capability at least once per calendar month but failed to initiate action to repair or designate a replacement Alternative Interpersonal Communications in more than 2 hours and less than or equal to 4 hours if the test was unsuccessful. 7. VSL for Requirement R10 a. ReliabilityFirst provided alternate language for R10 in the comments listed above. If the alternate language is not incorporated, ReliabilityFirst recommends the following language for the Lower VSL. Similar language could be used for the Moderate, High and Severe VSLs as well. i. The responsible entity failed to notify entities as identified in Requirements R1 through R6 more than 60 minutes but less than or equal to 70 minutes of the detection of a failure of its Interpersonal Communications capabilities. b. If the alternate language for R10, in the comments listed above, is incorporated, ReliabilityFirst recommends the following language for the Lower VSL. Similar language could be used for the Moderate, High and Severe VSLs as well. i. The responsible entity failed to notify entities as identified in Requirements R1 through R6 more than 30 minutes but less than or equal to 740 minutes of the detection of a failure of its Interpersonal Communications capabilities c. For Moderate VSL (the VSL after the OR statement), ReliabilityFirst recommends using a percentage rather than the "least one, but not all" statement. For example, if there is say 100 impacted entities and the applicable entity only notify 1, they would only fall under the Moderate. In another scenario there is say 100 impacted entities and the applicable entity only notified 99, they would also fall under the Moderate as well. The use of percentages will help even this out. 8. VSL for Requirement R11 a. For consistency with the requirement language, ReliabilityFirst recommends the following language: i. The responsible entity that experiences a failure of any of its Interpersonal Communication capabilities failed to consult with their Transmission Operator or Balancing Authority as applicable to determine a mutually agreeable time to restore the Interpersonal Communication capability. Comments on COM-002-3 1. Requirement R1 a. Based on ReliabilityFirst suggested change to the definition of "Reliability Directive" as noted in Question 5, ReliabilityFirst recommends deleting Requirement R1. Based on the suggested definition, any communication initiated, where an action by the recipient is required, is considered a "Reliability Directive." Thus, there would no longer be a need for responsible entity to identify the action as a "Reliability Directive" to the recipient. 2. VSL for Requirement R3 a. For consistency with the requirement language, ReliabilityFirst recommends the following language: i. The responsible entity issued a Reliability Directive, but failed to confirm that the response from the recipient of the Reliability Directive (in accordance with Requirement R2) was accurate. Comments on IRO-001-3 1. Requirement R1 a. ReliabilityFirst seeks further clarity on why Requirement R1 only requires the Reliability Coordinator to have the "authority to act" rather than requiring the Reliability Coordinator to actually "take action" to prevent identified events that result in an Emergency or Adverse Reliability Impacts. Having the "authority to act" does not inherently require the Reliability Coordinator to take action, if appropriate. b. ReliabilityFirst seeks further clarity on the language "to prevent identified events." If the event was already identified, how can the Reliability Coordinator act to prevent it? ReliabilityFirst recommends adding the word "potential" in between the words "prevent" and "identified." 2. Requirement R3 a. There is no time qualifier specified in Requirement R3 dealing with the timeframe in which the applicable entity has to inform its Reliability Coordinator of its inability to perform as directed in accordance with Requirement R2. Without a time qualifier, Requirement R3 is open ended and could cause issues if the applicable entity does not inform its Reliability Coordinator upon recognition of its inability to perform as directed in a timely manner. ReliabilityFirst recommends the following language for Requirement R3: i. Each Transmission Operator, Balancing Authority, Generator Operator, and Distribution Provider shall inform its Reliability Coordinator within 30 minutes upon recognition of its inability to perform as directed in accordance with Requirement R2. 3. VSL for Requirement R1 a. Requirement R1 requires the Reliability Coordinator to "... have the authority to act" - and the VSL does not reflect this language. ReliabilityFirst had questioned why Requirement R1, does not specifically require the RC to take action or direct actions in a comment submitted under Requirement R1. If the SDT does not change the language in Requirement R1, ReliabilityFirst recommends the following language: i. The Reliability Coordinator failed to have the authority to take action or direct actions, to prevent an identified event that resulted in an Adverse Reliability Impact

4. VSL for Requirement R2 a. For the High VSL, the words "fully comply" are ambiguous and open to interpretation. ReliabilityFirst recommends only having a Severe VSL. b. The Severe VSL states "directive" while Requirement R2 states "direction". To be consistent, ReliabilityFirst recommends the following language: i. "The Responsible Entity failed to comply with its Reliability Coordinator's direction"
Individual
Randall McCamish
City of Vero Beach
Yes
In COM-001-2 R5.3, should a BA have communications with a DP or LSE? For the TOP, it is the DP because the load influence is very local; however, for a BA the supply / demand balance is not local and in markets that allow retail competition, it may be that the LSE is the more appropriate functional entity. For instance, the Functional Model when discussing LSE on page 55 states that one of the LSE's real time duties is: "12. Receives requests from the Balancing Authority and Distribution Provider for voluntary load curtailment." If the LSE is the more appropriate entity, then R7 would need to be changed and a new requirement specific to LSE's would need to be added. For Florida, which does not have retail competition, it doesn't matter whether the DP or the LSE is more appropriate; hence, the "yes" answer.
Yes
Yes
No
By use of the term "any" in the phrase "a failure of any of its Interpersonal Communication" the standard will actually create a disincentive for redundant communications with DPs and GOPs due to compliance risk. To truly further the goals of reliability, the requirement should align with R3.3 and R3.4 which requires a primary Interpersonal Communications capability and R4 which does not require DPs or GOPs to have Alternative Interpersonal Communications capability. A possible solution is through use of the terms "Primary" for R3 and "Alternate" for R4 and then make R11 applicable to Primary only.
Yes
In the definition of Interpersonal Communication, the use of the word "medium" is ambiguous. Suggestions for alternatives: "system", "channel". COM-001-2, R1 and R3, the phrase: "have Interpersonal Communications capabilities", what if the communication system fails? Is that an immediate non-compliance (especially R3.3 and R3.4 which do not require a redundant system). Suggest using EOP-008 type of language to allow restoration of failed equipment without non-compliance. COM-001-2, R9 - "Each ... shall test its Alternative Interpersonal Communications capability", suggest adding the phrase "to each entity for which Alternative Interpersonal Communications is required" to add clarity. In addition, the type of testing is unclear and ambiguous. The is also ambiguity in the terms "direct", "directive", "direction" and "Reliability Directive". The SDT may want to consider using the terms "instruct" and "instruction" in place of "direct", "directive", "direction" to more clearly distinguish from a Reliability Directive.
Individual
Rich Salgo
NV Energy
Yes
Yes
Yes
Yes
Agree, however, the ability for a DP or GOP to have such consultation with its TOP or BA would likely be hampered by the failure of the Interpersonal Communications itself. DP and GOP are only required to have a single source for this Interpersonal Communications.
Yes
The meaning of R9 is open to some interpretation. It states that if the monthly test is unsuccessful, the entity shall "initiate action to repair or designate a replacement" AIC within 2 hours. The meaning of this is unclear in several ways: First, does "initiate action" apply to the remainder of the sentence or just to the "repair" option? Second, what constitutes initiation of action? Is it the intent of the SDT that the alternate interpersonal communications be restored within a 2-hour limit? If so, the words do not clearly state that, and it seems an impossible task to ensure no more than 2-hr outage to an alternate communications medium. I am voting affirmative under the interpretation that one must only "initiate" the repair or "initiate" the designation of a replacement option within this tight 2-hour limit.
Individual
Rebecca Moore Darrah
Midwest Independent Transmission System Operator
Yes
Yes
Yes
No
MISO requests clarification regarding (1) when Distribution Providers/Generator Operators have an obligation to collaborate with Transmission Operators versus Balancing Authorities; and (2) the obligation of Transmission Operators to inform Balancing Authorities (and vice versa) of an agreed upon time for restoration of Interpersonal Communication capability when collaboration occurs only between Transmission Operators and Distribution Providers/Generator Operators or, conversely, Balancing Authorities and Distribution Providers/Generator Operators.
No
The proposed definition of Reliability Directive is unacceptable because the use of the defined terms "Emergency" and "Adverse Reliability Impact" results in an undefined, broadened scope of responsibility for Reliability Coordinators when coupled with the definition of the Bulk Electric System. This may lead to confusion/ambiguity for Reliability Coordinators that must be clarified to ensure compliance. Further, this broadened scope may mis-direct Reliability Coordinator's attention and mitigation efforts to small-scale, localized issues that represent no true threat to the operation of the Interconnection.
COM-001-2, R2 and R6: MISO requests clarification as to whether the designation of Interpersonal Communications and Alternative Interpersonal Communications methods by Responsible Entities must be formally documented and/or agreed upon with those entities with which communications capability must be established. COM-001-2, R9: MISO suggests that the designation of Alternative Interpersonal Communications methods should not require formal documentation and may be agreed upon (when necessary) informally with those entities with which communications capability must be established in the event of an unsuccessful test of its Alternative Interpersonal Communications capability. COM-001-2, Requirement R10: MISO requests clarification as to whether "impacted entities" refers to those entities with which the Responsible Entity must have Interpersonal Communications and Alternative Interpersonal Communications capability. Further, MISO requests clarification as to whether the notification required by R10 must be made using the Alternative Interpersonal Communications method selected by the Responsible Entity. COM-002-3, R1 - R3: MISO respectfully submits that, while it appreciates the distinction in responsibilities proposed in the new COM-002-3 and acknowledges that such distinction is beneficial, these requirements increase compliance risk and potential penalty liability without attendant benefit to the reliability of the Bulk Electric System. MISO respectfully suggests that Requirements 2 and 3 be converted into sub-requirements as follows: R1. When a Reliability Coordinator, Transmission Operator or Balancing Authority requires actions to be executed as a Reliability Directive, the Reliability Coordinator, Transmission Operator or Balancing Authority shall identify the action as a Reliability Directive to the recipient. [Violation Risk Factor: High][Time Horizon: Real-Time] R1.1. When the Reliability Coordinator, Transmission Operator or Balancing Authority identifies a stated action as a Reliability Directive, the receiving Balancing Authority, Transmission Operator, Generator Operator, and Distribution Provider shall repeat, restate, rephrase or recapitulate the Reliability Directive to the Issuing Reliability Coordinator, Transmission Operator or Balancing Authority. [Violation Risk Factor: High][Time Horizon: Real-Time] R1.2. When the Reliability Coordinator, Transmission Operator, and Balancing Authority that issues a Reliability Directive receives a response from the receiving Balancing Authority, Transmission Operator, Generator Operator, and Distribution Provider, it shall then either [Violation Risk Factor: High][Time Horizon: Real-Time]: • Confirm that the response from the recipient of the Reliability Directive (in accordance with Requirement R2) was accurate, or • Reissue the Reliability Directive to resolve any misunderstandings.
Individual
Don Jones
Texas Reliability Entity
Yes
No
(1) Requirements R1, R2, R3 and R4 should apply to all adjacent Reliability Coordinators and Transmission Operators, regardless of whether they are in the same Interconnection. The ERCOT Interconnection is asynchronously connected to adjacent Interconnections, and it is imperative that Functional Entities within Texas RE's purview be able to exchange operating information with Transmission Operators and Reliability Coordinators in those adjacent areas, even if they are in a different Interconnection. (2) Requirement parts R5.5 and R6.3 refer to "Adjacent Balancing Authorities." Measures M5 and M6 refer to "adjacent Balancing Authority" - note the small "a" on adjacent. "Adjacent Balancing Authority" is a defined term in the NERC Glossary, which has a more specific meaning than "adjacent Balancing Authority." Which term is intended in R5.5 and R6.3? If you don't intend to use the defined term, perhaps use a word like "contiguous" or "neighboring" rather than "adjacent."
Yes
No
(1) Why does R10 refer to "failure of its Interpersonal Communications capabilities" while R11 refers to "failure of **any of** its Interpersonal Communications capabilities"? What is the distinction that is

intended by addition of the words "any of"? (2) As a Compliance Enforcement Authority, we have several fundamental questions regarding what is intended in this standard. It appears the drafting team is using the defined term "Interpersonal Communications" to refer to a designated primary communication medium, and the term "Alternative Interpersonal Communications" to refer to one or more designated backup communication mediums. Is that correct? This should be clarified in the Standard. (3) There is ambiguity in the current draft because the defined term "Interpersonal Communications" appears to include primary, back-up and all other mediums that may be available (which may include landline phone, cell phone, satellite phone, instant messaging, email, and data links, all in one facility), including any "Alternative Interpersonal Communications". Do R10 and R11 apply to ALL available mediums, or just to the designated primary and back-up mediums? Does R9 apply to ALL available back-up mediums, or just to a specifically designated back-up medium?

No

We oppose the definition of Reliability Directive as it is currently being proposed in this standard because three-part communication should not be required only after an Emergency or Adverse Reliability Impact actually occurs. In particular we object to the removal of the word "expected" (or "anticipated") from the definition, because Reliability Directives may be required before a situation escalates to an Emergency, in order to prevent the Emergency from occurring. This proposed change potentially undermines efforts required to avoid emergencies and events. We note that there are instances in other Reliability Standards where "anticipated" conditions require actions to be taken (e.g. TOP-001-1 R5 and EOP-002 R4), when clear, concise, and definitive communication, verbal or electronic, is required to avoid or mitigate an impending emergency

(1) There are numerous errors in the Mapping Document in referencing the current version of the standard and requirement. Specifically, referencing IRO-001-2 where it appears that the document should reference standard IRO-001-3. In addition, the notes on page 2 of COM-002-3 are incorrect. (2) In the VRF/VSL Justification document, there are numerous errors in referring to standard versions and requirements: (3) In IRO-001-3, R1 – What is an "identified event," and who "identifies" an event that requires compliance with this requirement R1? An RC may choose not to "identify" an event, such as a limit violation, and run the risk of causing or exacerbating an emergency. If the RC does not "identify" the event, it may become an actual event and then fall within the standard. (4) In the VSL for IRO-001-3, R1, there should be language in the VSL to capture the term "Emergency," which was added in the Requirement. The High VSL for R2 needs to be fixed. (5) In IRO-001-3, R1, remove the "s" in the phrase "Adverse Reliability Impacts." (6) Referring to the Implementation Plan for IRO-001 – There is a different list in the Implementation Plan (R2, R4, R5, R6, R7, R9) than the Revision History of the Standard (R2, R4, R5, R6, R8). Where is the retirement of R1 shown? (7) Referring to COM-001-2: Measure 7, the word "that" is inadvertently repeated in the first sentence. (8) In COM-001-2, Measure 9, is "at least on a monthly basis" to be interpreted differently than "at least once per calendar month" as stated in the requirement? (9) In COM-001-2, there is a "Measure 12" bullet that should be removed. (10) Referring to COM-002-3: Electronic directives (which may be issued over many different types of electronic communication channels) are increasingly necessary to manage the modern, dynamic Bulk Power System (generation and transmission) on a real-time basis. The effective use of electronic directives is undermined by this proposed Standard in its current form. This draft standard, in conjunction with other standards that refer to directives, appears to require that directives (at least Reliability Directives) be given verbally. The failure of the NERC standards to address electronic directives may cause significant manpower issues for BAs with large portfolios of generation to manage. (11) In the VSL for COM-001-2 R4, a reference to Part 4.3 should be added. (12) In IRO-001-3, Part 1.3 Data Retention, the reference in the first bullet to "Electric reliability Organization" is incorrect. We think it should say "Reliability Coordinator" instead. The other references to entities and to Requirements in this Part 1.3 also appear to be incorrect and need to be updated and corrected. (13) Referring to COM-001-2, the prior version of this standard included Requirement R5: "Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall have written operating instructions and procedures to enable continued operation of the system during the loss of telecommunications facilities." This Requirement has been removed from the present draft of COM-001-2. The mapping document seems to suggest that this Requirement was moved to EOP-008, but it is not there. We are concerned that removal of this Requirement will result in a reduction in the level of BES reliability and introduce a potential reliability gap.

Individual

David Kiguel

Hydro One Networks Inc.

Yes

No

(1) We agree with the addition of "Adjacent" entities in the quoted parts except the qualifier "synchronously connected within the same Interconnection" need to be removed from Parts 3.5 and 4.3 since TOPs do communicate with other TOPs even in another Interconnection (e.g. between Quebec and all of its asynchronously interconnected neighbors). Even in the case of ERCOT, TOPs on the two sides of a DC tie do communicate with each other for daily operations. (2) Measure M3 does not cover the added R3.5 condition (having Interpersonal Communications capability with each adjacent TOP). M3 needs to be revised.

No

(1) In the last posting, there were suggestions of removing the phrase "within the same Interconnection" from R1 (now R2.2) since there are RCs between two Interconnections that need to communicate with each other for reliability coordination (e.g. between Quebec and the RCs the Northeast such as IESO, NYISO, NBSO and ISO-NE, and between the RCs in WECC with the RCs in the Eastern Interconnection). Such coordination may include but not limited to curtailing interchange transactions crossing Interconnection/RC boundary, as stipulated in IRO-006. The SDT's response to our comments citing that the phrase was added to address the ERCOT situation leaves a reliability gap to the other situations. We again urge the SDT to remove the phrase. If necessary, the ERCOT situation can be addressed by a regional variance.

Yes

Yes

(1) The proposed implementation plan conflicts with Ontario regulatory practice respecting the effective date of the standard. It is suggested that this conflict be removed by appending to the implementation plan wording, after "applicable regulatory approval" in the Effective Dates: Section A5 on P. 4 of the draft standard COM-001, COM-002 and IRO-001, and on P. 2 of COM-001's Implementation Plan and P. 1 of COM-002's and IRO-001's Implementation Plans, to the following effect: ", or as otherwise made effective pursuant to the laws applicable to such ERO governmental authorities." (2) COM-001: Measure M9: - "monthly basis". Suggest changing "monthly basis" to "at least once per calendar month" to be consistent the wording in R9. (3) IRO-001: Measures M1, M2, M3 – The types of evidence are listed in paragraph form. This is not consistent with presentation style in COM-001-2 Measures, where evidence is listed in bullet format. Suggest using bullet form for consistency. (4) IRO-001, Data Retention Section: i. The retention requirements do not reflect the revised requirements. For example: the Electric Reliability Organization is no longer a responsible entity; the Reliability Coordinator should replace the ERO for keeping data for R1; Transmission Operator, Balancing Authority, Generator Operator and Distribution Provider should replace the Reliability Coordinator for keeping data for R2; and there is no R4/M4. ii. Section 1.3, second paragraph: "The Reliability Coordinator, Transmission Operator, Balancing Authority, Generator Operator, or Distribution Provider... shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation." The word "or" between Generator Operator and Distribution Provider should be changed to "and".

Individual

Gregory Campoli

New York Independent System Operator

Yes

No

It is not clear the distinction between an Emergency and ARI. We would like to confirm that since ARI is the impact of an event that results in instability or cascading, that an ARI is a subset of an emergency? Or said differently is an ARI simply instability or cascading? Ultimately if ARI is a subset of Emergency, then why do we need both in the requirement?

COM-001 The drafting team has complicated the requirements by having different requirements between RC/TOP/BA and other entities such as GOP/LSE/DP. The proposal is for redundancy to be required only between RC/TOP/BA. The requirement should be simplified to require all identified entities to have plans for loss of primary communication channels. This could include third parties as a communication channel. COM-002 The drafting team added a requirement to identify a Reliability Directive is being initiated during an emergency to track 3-part communication for compliance purposes. This will change and complicate the communication protocols between normal and emergency operations simply to simplify compliance assessments. The NYISO is asking for clarification that an entity may identify Reliability Directives as a category of communications to be communicated through procedures and training; and will not require a different communication protocol between normal and emergency operations. Affective communications can only be achieved through consistent processes for all conditions. Compliance assessments should be made on when we are in an emergency or not, and not on how the dialogue was initiated.

Group

ZGlobal Engineering and Energy Solutions

Mary Jo Cooper

Yes

Yes

No

No

We are pleased that the drafting team addition provides additional description on the process for communicating failed Interpersonal Communication. However additional clarity should be made regarding if there is an expectation that the Interpersonal Communication should be available 24x7. There are many Distribution Providers that do not have a 24x7 managed facility that can view and respond to a communication received in real time on the Interpersonal Communication device. These DP's rely on on-call personnel for off-hour emergencies such as an outage on the distribution system. The on-call personnel may use a cell phone, pager, etc. In other cases the Transmission Operator or Balancing Authority may communicate by email and response is provided during business hours. In these cases, if the Transmission Operator or Balancing Authority had a system emergency they have the ability to isolate the distribution system from the grid and therefore do not require a 24x7 manned distribution. If the intent of the Standard is for ensuring real-time communication than the applicability should be limited to those Distribution Providers who have been required by the Transmission Operator or Balancing Authority to have a manned 24x7 manned facility. Many of the DP's referred to here have not received a real-time call in the last 20 years. Requiring them to staff 24x7 for a condition likely not to occur is cost prohibited and does not improve reliability.

Yes

Group

ACES Power Marketing Standards Collaborators
Jason Marshall
No
While we agree with removing LSE, PSE, and TSP, we do not agree with the need to include Distribution Provider in all the standards. For example, in IRO-001-3, the Distribution Provider will likely never receive a Reliability Directive directly from its Reliability Coordinator. More likely, the Reliability Directive will be issued by the Transmission Operator or Balancing Authority depending on if the issue is security or adequacy related.
Yes
Yes
We thank the drafting team for making this change and for the clear communication that the intent of this standard is not for data exchange in the response to comments. However, we do believe one additional change is necessary to make the intent absolutely clear. The purpose of statement of COM-001-2 still includes the phrase "to exchange Interconnection and operating information". Since a standard must stand on its own, we believe it is necessary to remove that phrase from the purpose statement to avoid misinterpretations in the future. Auditors and enforcement personnel are not required to understand the development history when enforcing the standard. Furthermore, the purpose is really to enable communications between these functional entities.
No
Requirement R11 does not fully address the issue of what is required by Distribution Providers and Generator Operators and introduces new issues. First, while the standard is intended to clarify that the Distribution Provider and Generator Operator do not need backup communications capability, it simply does not. Distribution Providers and Generator Operators are required to have an Interpersonal Communications capability in Requirement R7 and R8 respectively. Unfortunately, the effectiveness of these requirements persists even when the Distribution Provider or Generator Operator experiences a failure of its Interpersonal Communications capability. When Requirement R11 applies, the Distribution Provider or Generator Operator will still be obligated to comply with Requirements R7 and R8 respectively and will, in fact, be in violation of these requirements because the Distribution Provider or Generator Operator no longer has the capability. Second, capability is used inconsistently between Requirement R7 and R11 which leads to confusion. In Requirement R7, it is singular while in Requirement R11 is plural. It needs to be clear that only the failure of the capability identified in R7 and R8 needs to be reported by the Distribution Provider and Generator Operator respectively. Third, if the requirements focused on communications devices rather than capabilities, they would come closer to communicating the intent. Requirement R11 would better complement Requirement R7 and R8 if the focus was on having a communication medium or device. A Generator Operator with an installed communications device or medium still has that device or medium even when it is not functioning properly and could still meet Requirements R7 and R8. However, they don't have the Interpersonal Communications capability if the device is not functioning properly.
Yes
The following comments are regarding IRO-001-3. We disagree with including "authority" in this standard. FERC Order 693a, paragraph 112, made it clear that the authority of a registered entity is established through the approval of the standards by FERC. Thus, a Reliability Coordinator gets its authority to issue Reliability Directives by having a requirement that states it must issue Reliability Directives approved by the Commission. Please change "shall have authority to act" in Requirement R1 back to "shall act". Please also remove all other vestiges of authority from the standards including in the purpose, measures and VSLs. Requirement R1 should require the use of Reliability Directives. The requirement compels the Reliability Coordinator "to direct others to act to prevent identified events or mitigate the magnitude or duration of actual events that result in an Emergency or Adverse Reliability Impact". Reliability Directives are necessary to address Adverse Reliability Impacts or Emergencies and trigger the use of three-part communications identified in COM-002-3. COM-002-3 R1 really compels the Reliability Coordinator to use a Reliability Directive for Emergencies and Adverse Reliability Impacts with the opening clause: "When a Reliability Coordinator, Transmission Operator, or Balancing Authority determines actions need to be executed as a Reliability Directive". What else could be more important for a Reliability Coordinator to issue a Reliability Directive than for an Emergency or Adverse Reliability Impact? Thus, not requiring the use of Reliability Directives for Adverse Reliability Impacts and Emergencies makes IRO-001-3 R1 and COM-002-3 R1 inconsistent. For clarity and consistency, Requirement R2 and R3 should also be clear that the responsible entities will respond to the Reliability Coordinator's Reliability Directives. Furthermore, this would make the standard consistent with how Reliability Directives are handled by the Transmission Operator in the draft TOP-001-2 standard proposed by the Real-Time Operations drafting team (Project 2007-03). The Data Retention section needs to be modified. The first bullet applies to the Electric Reliability Organization and Requirement R1 and Measure M1. The actual requirement and measure apply to the Reliability Coordinator. Furthermore, five calendar years exceeds the audit period of three years for a Reliability Coordinator. The second bullet incorrectly applies to the Reliability Coordinator and Requirement R2 and Measure M2. Requirement R2 and Measurement M2 apply to Transmission Operators, Balancing Authorities, Generator Operators and Distribution Providers. The third bullet mentions Requirement R4 and Measurement M4. There is no Requirement R4 and Measurement M4 in the standard. The VSLs for Requirement R1 are not consistent with the requirement. The VSL states that it is for failure to act while the requirement compels the Reliability Coordinator to have the authority to act. This modifies the requirement which is not allowed under FERC VSL guidelines. The VSLs for Requirement R2 need to include the "unless" clause from the requirement. Otherwise, the VSL implies that the responsible entity violated the requirement for failing to follow the directive even if they could not for one of the reasons listed in the requirement. This again is not consistent with FERC guidelines that state VSLs cannot modify the requirement. The following comments pertain to COM-001-2. We recommend striking "capability" from all of the requirements. It is not clear to us how this helps when a definition for Interpersonal Communications is written already and applies to a communication medium. Furthermore, we think it causes confusion and actually contradicts the intent of the standard. Because Requirements R1, R3, R5, R7 and R8 focus on capability, the responsible entity will be in violation anytime it medium that it uses for the primary capability does not function properly. Whereas if the requirement stated that the responsible entity was to designate a primary communications medium, the responsible entity is not in violation if that medium is not functioning properly. It would be clear that Requirement R2, R4 and R6 are intended to be complementary. Furthermore, it is not clear why Requirements R1, R3, R5, R7 and R8 state that the responsible entity shall "have" when the companion Requirements R2, R4, and R6 state "designate." Since Requirement R10 deals with a failure of its Interpersonal Communications capabilities and not Alternate Interpersonal Communications capability, it should only refer to the entities in Requirements R1, R3, and R5. Currently, it includes R1 through R6. We suggest changing "physical assets" to "demonstration of physical assets". Since evidence is provided to the auditor and the auditor takes the evidence with them, providing them evidence that is a "physical asset" would be problematic. We believe that the VSLs could be written to provide more gradations. For example, if a Transmission Operator or Balancing Authority failed to have Interpersonal Communications capability with a Distribution Provider but had Interpersonal Communications capability with all other required entities, it has met the vast majority of the requirement. Since VSLs are a measure of how much the requirement was missed by the responsible entity, jumping to a Severe VSL does not seem to adequately capture that the responsible entity met the vast majority of the requirement. Requirements R4 and R6 even seem to recognize this by not including Distribution Provider in the list of entities to which the Transmission Operator or Balancing Authority are required to designate Alternate Interpersonal Communications capability. The following comments pertain to COM-002-3. While COM-002-3 is well written to explain the three-part communications requirements and makes it perfectly clear when Reliability Directive has been issued, the opening clause leaves the responsible entity open to second guessing on whether they should have issued a Reliability Directive. This problem could be solved by changing the opening clause to "When a Reliability Coordinator, Transmission Operator, or Balancing Authority determines actions need to be executed as a Reliability Directive". In the second bullet of Requirement R3, we suggest using "Restate" in place of "Reissue". The responsible entity is not really reissuing the Reliability Directive. They are still in the act of trying to get the Reliability Directive issued and are simply re-communicating it because it was not understood.
Individual
Andrew Z. Puztal
American Transmission Company, LLC
Yes
Group
Kansas City Power & Light
Michael Gammon
Yes
No
Requirements R4.3 and R6.3 require TOP's and BA's to establish alternative means of "interpersonal communications" with other TOP's and BA's without regard to the reliability impact each TOP or BA has on the interconnection. Why would it be necessary for a TOP with one 161kv transmission line or a BA with 100 MW of total load, or one GOP with a 30MW unit to realize additional costs when the facilities they operate have little reliability impact? Rationale criteria should be included here to identify the TOP's and BA's where alternative means of "interpersonal communications" should be implemented. Furthermore, these requirements do not recognize the condition when another party refuses to install alternative communication equipment. TOP's and BA's have no authority over other TOP's and BA's to establish alternative means of communication. Requirements that are dependent on the actions of other parties over which you have no control or authority are poor requirements. In addition, most RC's have established satellite telephone systems as back-up communication with TOP's and BA's. Some RC's may have to establish additional communication systems with some BA's as these requirements impose to avoid Standards of Conduct issues.
Yes
No
How does a DP or GOP experiencing a failure of its "interpersonal communications" consult with its TOP or BA to determine a mutually agreeable time for restoration of "interpersonal communications"? There are no requirements that require alternative "interpersonal communications" for the DP and GOP. This requirement cannot be fulfilled and should be removed.
Yes
R9 – considering the reliability of communication systems and System Operator attention may be on more important operational concerns, a 2 hour response to a problem with the alternative means of communication is over sensitive. Allowing for sometime in an operating shift would be more in line, such as 8 hours. Violation Severity Levels for COM-001-2: The VSL's for requirements R1-R8 and R11 do not recognize the efforts of Entities to meet the requirements. If an Entity failed to establish communications or alternative communications with 1 Entity out of 20 should that be Severe? Implementation Plan for COM-001-2: The implementation plan is too aggressive at completing in 6 months after regulatory approvals. Establishing agreements with other RC's, TOP's and BA's for alternative "interpersonal communications" regarding the various types of communications available that meet these requirements will take more than 6 months. Recommend 12 months to allow Entities sufficient time to reach agreements and to establish the communications.

