

Consideration of Comments on Initial Ballot — Reliability Coordination (Project 2006-06)
Date of Initial Ballot: February 25 – March 7, 2011

If you feel that the drafting team overlooked your comments, please let us know immediately. Our goal is to give every comment serious consideration in this process. If you feel there has been an error or omission, you can contact the Vice President and Director of Standards, Herb Schrayshuen, at 609-452-8060 or at herb.schrayshuen@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

Summary Consideration:

The RCSDT thanks all stakeholders for their comments. Many stakeholders provided comments suggesting revisions to the standards. Many of these suggestions were incorporated into the standards. As a result of the revisions, the RCSDT is moving COM-001-2, COM-002-3 and IRO-001-2 to a successive ballot. The RCSDT made a few clarifying edits to the remaining standards based on stakeholder comments. Therefore, IRO-002-3, IRO-005-4 and IRO-014-2 are being moved to recirculation ballot. Because of this approach, the SDT will be proposing an interim change to IRO-001: the elimination of Requirement R7, as it is duplicative of one of the requirements in IRO-014-2.

For the COM-001 standard, several commenters had suggestions for improvements to the requirement language and applicability. The RCSDT believes the standard correctly and adequately requires each applicable entity that would have capability to receive Interconnection and operating information to have Interpersonal Communications and Alternative Interpersonal Communications to be used when the Interpersonal Communication is not available. The RCSDT has addressed the applicability of the standards and implementation plans by aligning COM-001-2, and COM-002-3 to include the same entities and by removing LSE, PSE and TSP from the COM standards.

Many comments were concerned about both the medium (e.g. cellular, satellite, etc.) and media (e.g. voice, email, etc.) used for Interpersonal Communications. The current language avoids being prescriptive and allows each entity to determine what is suitable. Interpersonal Communication and Alternative Interpersonal Communication is between the applicable entities which may include multiple locations (e.g. a primary and back-up control center).

The RCSDT added the following Requirement Parts at the suggestion of stakeholders:

- 3.5 Adjacent Transmission Operators synchronously connected within the same Interconnection
- 4.3 Adjacent Transmission Operators synchronously connected within the same Interconnection
- 5.6 Adjacent Balancing Authorities
- 6.3 Adjacent Balancing Authorities

The RCSDT agrees with the many industry comments and removed the phrase "to exchange Interconnection and operating information" in requirements R1 through R8. This removal clarifies that the intent of this capability is NOT for the exchange of data.

A few commenters also expressed concerns about the frequency of testing Alternative Interpersonal Communications capability. The RCSDT believes that the proposed testing frequency is supported by the majority of stakeholders and is not overly burdensome.

¹ The appeals process is in the Reliability Standards Development Procedure: http://www.nerc.com/files/RSDP_V6_1_12Mar07.pdf.

Several commenters suggested that VSLs should be written based on the percent of entities rather than by an occurrence of a violation. VSLs must be written on a violation occurrence basis in accordance with FERC guidelines. The requirements specify which entities must be included in communications capabilities. If a single entity is missing, this is a violation of the requirement. According to VSL guidelines, if missing any part of the requirement could have the same reliability outcome as missing the entire requirement, the requirement is binary and the VSL must be severe.

A new requirement was added to COM-001 for clarity regarding responsibilities of the Distribution Provider and the Generator Operator when either entity experiences a failure of its Interpersonal Communication capability:

R11. Each Distribution Provider and Generator Operator that experiences a failure of any of its Interpersonal Communication capabilities shall consult with its 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]

This requirement requires collaboration between entities to restore a failed communications capability.

The RCSDT asked stakeholders if they believed that the requirements of TOP-001-1 obviate the need to develop additional requirements to address Xcel's comment as directed in FERC Order 693. The original justification that the RCSDT posited for not adding a requirement to directly address Xcel Energy's comments in paragraph 516 and FERC's related recommendation in paragraph 523 was that TOP-001-1 R3 was considered to address this concern. Since that time, the RTO SDT has proposed to retire TOP-001-1 R3. However, NERC has since retired IRO-004-1 R3 and R5 along with IRO-005-3 R5. Because these are retired, there are no longer any requirements that would force a TOP to wait for a delayed RC response during an emergency. Therefore the question is resolved, albeit differently than it was proposed to be resolved in this posting. If an RC were to give a Reliability Directive to a TOP that the TOP considered "would violate safety, equipment, regulatory, or statutory requirements," the TOP may respond to the RC that it cannot comply.

Stakeholders were asked if they agree with the revision to IRO-001, R1 for certifying Reliability Coordinators. Many commenters suggested removing the requirement because it is addressed in the NERC Rules of Procedure. The RCSDT concurs and has removed R1 from IRO-001-2.

A significant revision to IRO-001-2 was made by removing the Interchange Coordinator from the standard. The RCSDT made this revision because the Balancing Function is responsible for implementing interchange (see NERC Reliability Functional Model, version 5, page 32, item 7) and to operate the Balancing Authority Area to maintain load-interchange-generation balance (item 3). The RCSDT asked stakeholders if they agree with moving two requirements from IRO-001 back to IRO-002 relating to Analysis Tool outages. All stakeholders that responded agreed and there were no comments received.

The RCSDT asked stakeholders if they agree with moving two requirements from IRO-001 back to IRO-005 relating to Reliability Coordinator notifications. Several commenters noted a typographical error in R1 which was corrected to read:

When the results of an Operational Planning Analysis or Real-time Assessment indicate an expected or actual condition with Adverse Reliability Impacts within its Reliability Coordinator Area, each Reliability Coordinator shall notify ~~issue an alert to~~ all impacted Transmission Operators and Balancing Authorities in its Reliability Coordinator Area. [Violation Risk Factor: High] [Time Horizon: Real-time Operations, Same Day Operations and Operations Planning]"

One commenter also asked that an errant yellow text box be removed from Page 1, which was also done.

The RCSDT received a number of comments regarding the applicability of COM-001, and COM-002. The RCSDT agrees with these comments and has removed PSE and LSE from the COM-001-2 implementation plan. The RCSDT also addressed minor issues involving typos, formatting and style.

The RCSDT received comments suggesting clarification of COM-002-3. The RCSDT intends the communication of Reliability Directives to be person-to-person and in such a manner that the Reliability Directive is understood and not necessarily repeated verbatim. COM-002-3 is not intended to be prescriptive on how the Reliability Directive is issued. Spoken or written communications are valid methods (i.e. using the telephone, radio, electronic texting, email, etc.). The purpose of COM-002-3 is to ensure emergency communications between operating personnel are effective. There is no proxy requirement for 24/7 operating personnel regarding small entities. Only “capability” as provided for in COM-001-2 is applicable. The RCSDT agrees that the use of Blast Calls to issue Reliability Directives, in mass, is efficient and effective. The RCSDT believes Reliability Directives issued in mass should be defined by procedure, and that the procedure would establish a method of affirmation and notice of implementation. As envisioned, communications protocols would be addressed in the COM-003 standard being developed in Project 2007-02.

Some commenters suggested revisions to IRO-014, requirement R8 to conform to similar requirements R6 and R7. The RCSDT made the suggested revision by re-ordering R8:

R8. During those instances where Reliability Coordinators disagree on the existence of an Adverse Reliability Impact, each Reliability Coordinator shall implement the action plan developed by the Reliability Coordinator that identified the Adverse Reliability Impact unless such actions would violate safety, equipment, regulatory or statutory requirements. [Violation Risk Factor: High][Time Horizon: Operations Planning, Same Day Operations and Real-time Operations]

IRO-014-2, requirement R4 is applicable to those Reliability Coordinators engaged in activities related to requirement R1 and part 1.7. It is unlikely that Reliability Coordinators geographically and electrically distant from one another will have mutually agreed upon operating procedures (per requirement R1), and therefore requirement R4 would not be applicable. The RCSDT believes IRO-014-2, requirement R4 (which requires weekly communication) provides reasonable contact and flexibility – and this requirement is in effect today.

The RCSDT coordinated the use of the NERC Glossary term “Adverse Reliability Impact” with the Real-Time Operations team and continues the practice of informing all RCs of Adverse Reliability Impacts in requirement R5.

The RCSDT has revised IRO-014-2, requirements R6-R8 to clarify that when one RC identified a problem and presents an action plan for another RC, the second RC is obligated to implement the action plan. The RCSDT will forward the concern about RC's identifying themselves and the receiver to establish authority to the Project 2007-02, Operating Personnel Communications Protocols SDT. The Project 2007-02 team is developing a standard that includes requirements for use of specific communications protocols.

Voter	Entity	Segment	Vote	Comment
Edward P. Cox	AEP Marketing	6	Negative	<p>1) The applicability of COM-001 and COM-002 appear to be at odds with each other. The requirements may need to be re-written so that they are in sync.</p> <p>Response: The RCSDT has revised the applicability of COM-001 and COM-002 such that they contain the same functional entities. These are: RC, TOP, BA, GOP, and DP.</p> <p>2) The revision to IRO-001, R1 is out of scope with the standard, as it is currently addressed through the NERC certification process that the NERC reliability coordinators are subject to.</p>

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				<p>Response: Many commenters suggested removing the requirement because it is addressed in the NERC Rules of Procedure. The RCSDT concurs and has removed R1 from IRO-001-2.</p> <p>3) The language used in COM-002-3 R2 including “with enough details that the accuracy of the message has been confirmed” is subjective and ambiguous.</p> <p>Response: The RCSDT agrees with the intent of your comment and has modified COM-002-3, R2 as:</p> <p style="padding-left: 40px;">R2. Each Balancing Authority, Transmission Operator, Generator Operator, Transmission Service Provider, Load-Serving Entity, Distribution Provider, and Purchasing-Selling Entity that is the recipient of a Reliability Directive issued per Requirement R1, shall repeat, restate, rephrase or recapitulate the Reliability Directive.</p> <p>4) 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.</p> <p>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.</p>
<p>Response: The RCSDT thanks you for your comment. Please see responses above.</p>				

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Brock Ondayko	AEP Service Corp.	5	Negative	<p>1) The applicability of COM-001 and COM-002 appear to be at odds with each other. The requirements may need to be re-written so that they are in sync.</p> <p>Response: The RCSDT has revised the applicability of COM-001, and COM-002 such that they contain the same functional entities. These are: RC, TOP, BA, GOP, and DP.</p> <p>2) The revision to IRO-001, R1 is out of scope with the standard, as it is currently addressed through the NERC certification process that the NERC reliability coordinators are subject to.</p> <p>Response: Many commenters suggested removing the requirement because it is addressed in the NERC Rules of Procedure. The RCSDT concurs and has removed R1 from IRO-001-2.</p> <p>3) The language used in COM-002-3 R2 including “with enough details that the accuracy of the message has been confirmed” is subjective and ambiguous.</p> <p>Response: The RCSDT agrees with the intent of your comment and has modified COM-002-2, R2 as:</p> <p style="padding-left: 40px;">R2. Each Balancing Authority, Transmission Operator, Generator Operator, Transmission Service Provider, Load-Serving Entity, Distribution Provider, and Purchasing-Selling Entity that is the recipient of a Reliability Directive issued per Requirement R1, shall repeat, restate, rephrase or recapitulate the Reliability Directive.</p> <p>4) 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.</p> <p>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</p>

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				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.
<p>Response: The RCSDT thanks you for your comment. Please see responses above.</p>				
Richard J. Mandes	Alabama Power Company	3	Affirmative	Please see comments
<p>Response: The RCSDT thanks you for your comment. Please see response to posting comments for the SERC OC Standards Review Group; the RCSDT did not specifically find comments from Alabama Power Company and believes comments were included within this group.</p>				
Kenneth Goldsmith	Alliant Energy Corp. Services, Inc.	4	Negative	<p>While most of the changes recommended in the standards are acceptable to us, we do not believe multiple standards should be included in one ballot. You might ask for comments as a group, but each standard should be balloted separately.</p> <p>Response: The SDT has discussed this recommendation and has changed the way that these standards are being posting for ballot. Thank you for your suggestion.</p> <p>COM-001 R10 needs to be clarified that the "impacted entities" are within the same interconnection/area. It is not necessary to contact all entities as could be interpreted by the standard as currently written. We believe there may be differing levels of communication requirements, especially as it relates to smaller entities registered as DP's or LSE's that are not staffed 24 hours per day. We agree there is some responsibility of everyone to have some level of communications, the question is to what level.</p> <p>Response: R10 specifies only “impacted entities.” That phrase is used to limit the scope of the requirement. If an entity has a failure of its Interpersonal Communications capability with only one entity, then <i>that</i> entity is the “impacted entity” and they should be notified of the failure.</p>

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<p>Response: The RCSDT thanks you for your comment. Please see responses above.</p>				
Jennifer Richardson	Ameren Energy Marketing Co.	6	Negative	<p>Comment COM-001: (1) R2 is written with the onus on the Recipient to get repeat an accurate message. The Measure and VSL appear to attach to the Recipient to make a bad message into an accurate one.</p> <p>Response: The SDT assumes you intended to comment regarding COM-002-3 R2, as that is where the issuance, dialogue, and confirmation process is described, not COM-001. The SDT believes that it is the issuing entity which is required to decide whether the message has been received to its satisfaction. However, the SDT further believes the recipient of the original communications must be responsible for responding and participating in dialogue with the issuing entity. Without that, the issuing entity cannot decide whether the message has been received and understood.</p> <p>(2) R2 is too verbose.</p> <p>Response: Based on specific suggestions from other stakeholders, the team deleted the following phrase from R2:</p> <p style="padding-left: 40px;">with enough details that the accuracy of the message has been confirmed</p> <p>The team revised the associated VSL to:</p> <p style="padding-left: 40px;">The responsible entity that was the recipient of a Reliability Directive failed to repeat, restate, rephrase or recapitulate the Reliability Directive. with enough details that the accuracy of the message was confirmed.</p> <p>(3) We don't think Operations should rely on email, for instance, as an Interpersonal Communication capability. We should be explicit to exclude these kinds of medium. The medium must be near instantaneous like voice, cell, and satellite.</p> <p>Response: COM-002 does not preclude text or other forms of communication for issuing Reliability Directives.</p>
<p>Response: The RCSDT thanks you for your comment. Please see responses above.</p>				

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Kirit S. Shah	Ameren Services	1	Negative	<p>Comment COM-001: (1) R2 is written with the onus on the Recipient to get repeat an accurate message. The Measure and VSL appear to attach to the Recipient to make a bad message into an accurate one.</p> <p>Response: The SDT assumes you intended to comment regarding COM-002-3 R2, as that is where the issuance, dialogue, and confirmation process is described, not COM-001. The SDT believes that it is the issuing entity which is required to decide whether the message has been received to its satisfaction. However, the SDT further believes the recipient of the original communications must be responsible for responding and participating in dialogue with the issuing entity. Without that, the issuing entity cannot decide whether the message has been received and understood.</p> <p>(2) R2 is too verbose.</p> <p>Response: COM-002-3 R2: Based on specific suggestions from other stakeholders, the team deleted the following phrase from R2:</p> <p style="padding-left: 40px;">with enough details that the accuracy of the message has been confirmed</p> <p>The team revised the associated VSL to:</p> <p style="padding-left: 40px;">The responsible entity that was the recipient of a Reliability Directive failed to repeat, restate, rephrase or recapitulate the Reliability Directive. with enough details that the accuracy of the message was confirmed.</p> <p>(3) We don't think Operations should rely on email, for instance, as an Interpersonal Communication capability. We should be explicit to exclude these kinds of medium. The medium must be near instantaneous like voice, cell, and satellite.</p> <p>Response: COM-002 does not preclude text or other forms of communication for issuing Reliability Directives.</p>
<p>Response: The RCSDT thanks you for your comment. Please see responses above.</p>				
Gregory S Miller	Baltimore Gas & Electric Company	1	Affirmative	BGE is supportive of all 5 questions in the Comment Form.

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Response: The RCSDT thanks you for your support.				
Joseph S. Stonecipher	Beaches Energy Services	1	Negative	<p>From the last posting to this posting, for COM-002-3 R2, the phrase "the accuracy of the message has been confirmed" was added to the second step of three part communication. "Accuracy" is not the correct term here. "Understanding" is a better term. It would seem that "accuracy" is a term to be used in R3, the third part of the 3-part communication so that the issuer of the directive ensures the accuracy of the recipients understanding.</p> <p>I suggest changing COM-002-3 R2 to read:</p> <p>Each Balancing Authority, Transmission Operator, Generator Operator, Transmission Service Provider, Load-Serving Entity, Distribution Provider, and Purchasing-Selling Entity that is the recipient of a Reliability Directive issued per Requirement R1, shall repeat, restate, rephrase or recapitulate the Reliability Directive with enough details to clearly communicate the recipient's understanding of the Reliability Directive.</p> <p>The term "accuracy" can be interpreted as requiring the recipient to second-guess the Reliability Directive of the RC to ensure the accuracy of the RC's directive in the first place. Under tight time constraints of Emergencies, this is not practical. We are sure that was not the intent of the drafting team.</p> <p>Response: The SDT, in drafting the proposed language, did indeed discuss using the word "understanding" rather than accuracy. However, the SDT was not able to identify a feasible measure for "understanding". A recipient can judge whether the response is accurate when compared with the communications issued, but cannot judge the understanding of anyone, even though the responder may have accurately responded.</p> <p>For IRO-001-2, I don't see a need for R1. Doesn't the ERO already have that authority to establish RC's through the registration process, and to certify system operators through the PER standards?</p> <p>Response: Many commenters suggested removing the requirement because it is addressed in the NERC Rules of Procedure. The RCSDT concurs and has removed R1 from IRO-001-2.</p> <p>IRO-014-2 R5, "impacted" was replaced with "other". Wouldn't it be better to at</p>

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				<p>least limit the notification to within the same interconnection? Or is R5 truly to identify all NERC registered RC's?</p> <p>Response: This requirement continues the current practice of informing all RCs of Adverse Reliability Impacts (ARIs). Due to the nature of an ARI, this requirement is typically implemented as an RCIS message or a hotline call to all RCs. This is intended to make all RCs aware of ARIs and support situational awareness.</p> <p>More minor comments / suggestions for improvement: IRO-002 R2 can be improved by replacing "prevent identified events" with "prevent anticipated events". "Anticipated" aligns better with contingency analysis than "identified"</p> <p>Response: The SDT believes the commenter intended to be commenting upon IRO-001-2 R2 rather than IRO-002-2 R2. The SDT did indeed consider using the word "anticipated" rather than identified. However, the SDT believes that a decision cannot be made regarding whether to anticipate an event unless it is first identified through some method of assessment. Contingency analysis certainly can be one valid form useful in assessment. Since anything identified by such an assessment must be considered, the SDT believes the requirement should apply to what is identified, rather than the subjective decision of whether to expect or anticipate that which has been identified</p> <p>IRO-005-4 R1 and R2 can be improved by replacing "expected" with "anticipated". Contingencies are not necessarily "expected"; however, we do "anticipate" them.</p> <p>Response: The SDT agrees, and has revised the requirements per your suggestion.</p>
<p>Response: The RCSDT thanks you for your comment.</p>				
Bud Tracy	Blachly-Lane Electric Co-op	3	Negative	<p>Thank you for the opportunity to comment and for your hard work on this project: While we agree that effective Interpersonal Communications capability are integral to reliability, many Distribution Providers (DP) are small entities that do not maintain a 24-7 dispatch desk capable of receiving or responding to emergency reliability directives in a timely manner. It is our belief that some of the proposals in this project could unnecessarily force small entities to make investments that will not enhance reliability. Many DPs rely on answering services to address customer-service issues during non-business hours. On-call personnel are contacted in the event of an outage or emergency and crews are dispatched as appropriate. It is difficult to envision a BA or TOP issuing an Emergency Reliability Directive to a</p>

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				<p>small entity (25 MW or so) which would require these smaller entities to comply with COM-001. Order 693 directs the inclusions of DPs in the COM-001-2 standard but it is our belief that the Commission offered language that GOs and DPs need not have redundant communications, training unrelated to normal/emergency operations, and that telecommunications requirements for entities will vary according to their function. We believe those intentions should be reflected in the language of this standard. We would suggest adding wording such as in the applicability section, "Distribution Providers who maintain a 24-7 control centers with the ability to manually shed load of at least 100 MW within a 15-minute operational window."</p> <p>Also, a note that smaller, rural entities can be dependent on a phone system provider that will not allow for backup communications. Should the communication line(s) be dependent on one main phone trunk line, the failure due to an issue on this main line will make it impossible to notify anyone of its failure short of physically traveling to an area where phone service is available. For some rural areas, this will exceed the one hour time limit to report the communication outage. Forcing smaller entities to acquire satellite phone service to mitigate for a phone outage is a high price to pay when no reliability improvement will be achieved. Suggested change could be: "... shall notify impacted entities within 60 minutes of the detection of a failure of its Interpersonal Communications capabilities that lasts 30 minutes or longer where alternate forms of communication are available within a 15 minute access time. Should alternate forms of communication not be available within the 15 minute access time, then upon reestablishment of Communication capabilities impacted entities will be notified of the past loss and current status of Communication." We've heard many representatives from FERC and NERC indicate that the standards development process has led the industry to take action in many cases for the sake of compliance while not necessarily enhancing reliability. As has been stated many times, the process should be about improving reliability, not about complying with standards. Unnecessarily including smaller entities that will NEVER receive an emergency reliability directive might be an example of the former.</p>

Response: The RCSDT thanks you for your comment. There is no requirement for 24/7 support. The requirement is to have communications capability. The type of system (e.g., On-Call) is not prescribed in the standard, and the standard is designed not to impose needless communications requirements. The purpose of COM-002 is, "to ensure emergency communications between operating personnel are effective." It's not a proxy requirement to establish 24/7 operating personnel at small distribution providers. The intent is to establish a method of communicating Reliability Directives during Emergencies. While it is true that many small Distribution Providers are not staffed 24x7, it is typical that they have a means of communication - in many cases this may be via a receptionist or answering service. 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. If this

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return call would not be timely enough, then the issuer would determine a different mitigation plan.				
Gregory Van Pelt	California ISO	2	Abstain	The California ISO will be submitting comments Jointly as part of the ISO/RTO Council Standards Review Committee
Response: Thank you; please see responses to the comments submitted on the posting by the ISO/RTO Council Standards Review Committee.				
Dave Markham	Central Electric Cooperative, Inc. (Redmond, Oregon)	3	Negative	Thank you for the opportunity to comment and for your hard work on this project: While we agree that effective Interpersonal Communications capability are integral to reliability, many Distribution Providers (DP) are small entities that do not maintain a 24-7 dispatch desk capable of receiving or responding to emergency reliability directives in a timely manner. It is our belief that some of the proposals in this project could unnecessarily force small entities to make investments that will not enhance reliability. Many DPs rely on answering services to address customer-service issues during non-business hours. On-call personnel are contacted in the event of an outage or emergency and crews are dispatched as appropriate. It is difficult to envision a BA or TOP issuing an Emergency Reliability Directive to a small entity (25 MW or so) which would require these smaller entities to comply with COM-001. Order 693 directs the inclusions of DPs in the COM-001-2 standard but it is our belief that the Commission offered language that GOs and DPs need not have redundant communications, training unrelated to normal/emergency operations, and that telecommunications requirements for entities will vary according to their function. We believe those intentions should be reflected in the language of this standard. We would suggest adding wording such as in the applicability section, "Distribution Providers who maintain a 24-7 control centers with the ability to manually shed load of at least 100 MW within a 15-minute operational window." Also, a note that smaller, rural entities can be dependent on a phone system provider that will not allow for backup communications. Should the communication line(s) be dependent on one main phone trunk line, the failure due to an issue on this main line will make it impossible to notify anyone of its failure short of physically traveling to an area where phone service is available. For some rural areas, this will exceed the one hour time limit to report the communication outage. Forcing smaller entities to acquire satellite phone service to mitigate for a phone outage is a high price to pay when no reliability improvement will be achieved. Suggested change could be: "... shall notify impacted entities within 60 minutes of the detection of a failure of its Interpersonal Communications capabilities

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				<p>that lasts 30 minutes or longer where alternate forms of communication are available within a 15 minute access time. Should alternate forms of communication not be available within the 15 minute access time, then upon reestablishment of Communication capabilities impacted entities will be notified of the past loss and current status of Communication." We've heard many representatives from FERC and NERC indicate that the standards development process has led the industry to take action in many cases for the sake of compliance while not necessarily enhancing reliability. As has been stated many times, the process should be about improving reliability, not about complying with standards. Unnecessarily including smaller entities that will NEVER receive an emergency reliability directive might be an example of the former.</p>
<p>Response: The RCSDT thanks you for your comment. There is no requirement for 24/7 support. The requirement is to have communications capability. The type of system (e.g., On-Call) is not prescribed in the standard, and the standard is designed not to impose needless communications requirements. The purpose of COM-002 is, "to ensure emergency communications between operating personnel are <u>effective</u>." It's not a proxy requirement to establish 24/7 operating personnel at small distribution providers. The intent is to establish a <u>method</u> of communicating Reliability Directives during Emergencies. While it is true that many small Distribution Providers are not staffed 24x7, it is typical that they have a means of communication - in many cases this may be via a receptionist or answering service. 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. If this return call would not be timely enough, then the issuer would determine a different mitigation plan.</p>				
Steve Alexanderson	Central Lincoln PUD	3	Negative	<p>The stated purpose of COM-002 is: "To ensure emergency communications between operating personnel are effective." As written, the standard fails to meet this purpose because the three requirements only deal with communications at the entity level. There is no requirement for the directing entity to even try to reach operating personnel at the receiving entity. The directing entity may follow all the requirements of this standard by following R1 and R3 with the receiving entity's receptionist, answering service, janitor, night watchman, etc. The receiving entity only needs to meet R2, parroting the directive. Again this could be accomplished by anyone with no assurance the directive reaches the operating personnel who can implement it. When we stated a similar objection during the last comment period, The SDT's answer suggested this was a PER staffing issue, but none of the PER requirements even apply to DP/LSE directive recipients. We suggest the entity issuing the directive should be required to make an attempt to get it to those who are competent to understand and implement the directive. This is not a staffing, training, or credentials issue; it is a performance issue that falls squarely within the stated purpose of this standard. COM-001 R10 presents a paradoxical situation to an entity attempting to comply. Consider an interpersonal communication capability</p>

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				<p>failure that lasts longer than 60 minutes past initial detection. At or before 60 minutes, the affected entity is expected to notify impacted entities. If it has no interpersonal communication capability, how shall it make this notification? And if the entity does manage to make such a notification, it has thereby proven that it does have interpersonal communication capability making such notification unnecessary. We again ask the SDT to consider that not all the entities in the applicability sections of COM-001 and 002 have 24/7 dispatch centers. These are typically smaller entities that were required to register because they exceed 25 MW or were asked in the past to voluntarily provide UFLS. They do not and do not need to continuously communicate with TOPs, BAs, RCs, etc; and a “reliability directive” is a theoretical thing that has never happened during the memories of thirty year employees. The directive issuing entities simply realize the limitations around the receiving entities and work around them. The financial burden on these small entities and their customers to go to 24/7 dispatch will not have a corresponding reliability benefit. And while the two COM standards do not explicitly state that entities must maintain 24/7 dispatch, when all the requirements and definitions and time horizons are taken together 24/7 continuous competent communication is implied. During the last comment period, the SDT suggested this was a registration issue beyond their control. We submit instead that this is a standard applicability question that the SDT does have control over, since it is right there in Section A.4 of the two COM standards. While we appreciate that the SDT is responding to FERC order 693 to include DPs, we note that FERC also stated: Paragraph 487: “We expect the telecommunication requirements for all applicable entities will vary according to their roles and that these requirements will be developed under the Reliability Standards development process.” Paragraph 6: “A Reliability Standard may take into account the size of the entity that must comply and the costs of implementation” Paragraph 141: “...the Commission clarifies that it did not intend to ... impose new organizational structures...” Paragraph 31: “We emphasize that we are not, at this time, mandating a particular outcome by way of these directives, but we do expect the ERO to respond with an equivalent alternative and adequate support that fully explains how the alternative produces a result that is as effective as or more effective that the Commission’s example or directive. We ask the SDT to exclude DPs, LSEs, and PSEs that do not have 24/7 dispatch centers from the applicability of these two standards in order to meet FERC order 693.</p>
<p>Response: The RCSDT thanks you for your comment. There is no requirement for 24/7 support. The requirement is to have communications capability. The type of system (e.g., On-Call) is not prescribed in the standard, and the standard is designed not to impose needless communications requirements. The purpose of COM-002 is, “to ensure emergency communications between operating personnel are <u>effective</u>.” It’s not a proxy requirement to establish 24/7 operating personnel at small distribution providers. The intent is to establish a method of</p>				

Voter	Entity	Segment	Vote	Comment
<p>communicating Reliability Directives during Emergencies. While it is true that many small Distribution Providers are not staffed 24x7, it is typical that they have a means of communication - in many cases this may be via a receptionist or answering service. 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. If this return call would not be timely enough, then the issuer would determine a different mitigation plan.</p>				
Shamus J Gamache	Central Lincoln PUD	4	Negative	<p>The stated purpose of COM-002 is: "To ensure emergency communications between operating personnel are effective." As written, the standard fails to meet this purpose because the three requirements only deal with communications at the entity level. There is no requirement for the directing entity to even try to reach operating personnel at the receiving entity. The directing entity may follow all the requirements of this standard by following R1 and R3 with the receiving entity's receptionist, answering service, janitor, night watchman, etc. The receiving entity only needs to meet R2, parroting the directive. Again this could be accomplished by anyone with no assurance the directive reaches the operating personnel who can implement it. When we stated a similar objection during the last comment period, The SDT's answer suggested this was a PER staffing issue, but none of the PER requirements even apply to DP/LSE directive recipients. We suggest the entity issuing the directive should be required to make an attempt to get it to those who are competent to understand and implement the directive. This is not a staffing, training, or credentials issue; it is a performance issue that falls squarely within the stated purpose of this standard. COM-001 R10 presents a paradoxical situation to an entity attempting to comply. Consider an interpersonal communication capability failure that lasts longer than 60 minutes past initial detection. At or before 60 minutes, the affected entity is expected to notify impacted entities. If it has no interpersonal communication capability, how shall it make this notification? And if the entity does manage to make such a notification, it has thereby proven that it does have interpersonal communication capability making such notification unnecessary. We again ask the SDT to consider that not all the entities in the applicability sections of COM-001 and 002 have 24/7 dispatch centers. These are typically smaller entities that were required to register because they exceed 25 MW or were asked in the past to voluntarily provide UFLS. They do not and do not need to continuously communicate with TOPs, BAs, RCs, etc; and a "reliability directive" is a theoretical thing that has never happened during the memories of thirty year employees. The directive issuing entities simply realize the limitations around the receiving entities and work around them. The financial burden on these small entities and their customers to go to 24/7 dispatch will not have a corresponding reliability benefit. And while the two COM standards do not explicitly state that entities must maintain 24/7 dispatch, when all the requirements and definitions and time horizons are taken together 24/7 continuous competent communication is</p>

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				<p>implied. During the last comment period, the SDT suggested this was a registration issue beyond their control. We submit instead that this is a standard applicability question that the SDT does have control over, since it is right there in Section A.4 of the two COM standards. While we appreciate that the SDT is responding to FERC order 693 to include DPs, we note that FERC also stated: Paragraph 487: "We expect the telecommunication requirements for all applicable entities will vary according to their roles and that these requirements will be developed under the Reliability Standards development process." Paragraph 6: "A Reliability Standard may take into account the size of the entity that must comply and the costs of implementation" Paragraph 141: "...the Commission clarifies that it did not intend to ... impose new organizational structures..." Paragraph 31: "We emphasize that we are not, at this time, mandating a particular outcome by way of these directives, but we do expect the ERO to respond with an equivalent alternative and adequate support that fully explains how the alternative produces a result that is as effective as or more effective than the Commission's example or directive. We ask the SDT to exclude DPs, LSEs, and PSEs that do not have 24/7 dispatch centers from the applicability of these two standards in order to meet FERC order 693.</p>
<p>Response: The RCSDT thanks you for your comment. There is no requirement for 24/7 support. The requirement is to have communications capability. The type of system (e.g., On-Call) is not prescribed in the standard, and the standard is designed not to impose needless communications requirements. The purpose of COM-002 is, "to ensure emergency communications between operating personnel are <u>effective</u>." It's not a proxy requirement to establish 24/7 operating personnel at small distribution providers. The intent is to establish a <u>method</u> of communicating Reliability Directives during Emergencies. While it is true that many small Distribution Providers are not staffed 24x7, it is typical that they have a means of communication - in many cases this may be via a receptionist or answering service. 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. If this return call would not be timely enough, then the issuer would determine a different mitigation plan.</p>				
Gregg R Griffin	City of Green Cove Springs	3	Negative	<p>From the last posting to this posting, for COM-002-3 R2, the phrase "the accuracy of the message has been confirmed" was added to the second step of three part communication. "Accuracy" is not the correct term here. "Understanding" is a better term. It would seem that "accuracy" is a term to be used in R3, the third part of the 3-part communication so that the issuer of the directive ensures the accuracy of the recipients understanding. FMPA suggests changing COM-002-3 R2 to read: Each Balancing Authority, Transmission Operator, Generator Operator, Transmission Service Provider, Load-Serving Entity, Distribution Provider, and Purchasing-Selling Entity that is the recipient of a Reliability Directive issued per Requirement R1, shall repeat, restate, rephrase or recapitulate the Reliability Directive with enough details to clearly communicate the recipient's understanding of the Reliability Directive.. The term "accuracy" can be interpreted as requiring the recipient to second-guess</p>

Voter	Entity	Segment	Vote	Comment
				<p>the Reliability Directive of the RC to enure the accuracy of the RC's directive in the first place. Under tight time constraints of Emergencies, this is not practical. We are sure that was not the intent of the drafting team.</p> <p>Response: The SDT, in drafting the proposed language, did indeed discuss using the word "understanding" rather than accuracy. However, the SDT was not able to identify a feasible measure for "understanding". A recipient can judge whether the response is accurate when compared with the communications issued, but cannot judge the understanding of anyone, even though the responder may have accurately responded.</p> <p>For IRO-001-2, FMPA does not see a need for R1. Doesn't the ERO already have that authority to establish RC's through the registration process, and to certify system operators through the PER standards?</p> <p>Response: Many commenters suggested removing the requirement because it is addressed in the NERC Rules of Procedure. The RCSDT concurs and has removed R1 from IRO-001-2.</p> <p>IRO-014-2 R5, "impacted" was replaced with "other". Wouldn't it be better to at least limit the notification to within the same interconnection? Or is R5 truly to identify all NERC registered RC's?</p> <p>Response: This requirement continues the current practice of informing all RCs of Adverse Reliability Impacts (ARIs). Due to the nature of an ARI, this requirement is typically implemented as an RCIS message or a hotline call to all RC's. This is intended to make all RCs aware of ARIs and support situational awareness.</p> <p>More minor comments / suggestions for improvement: IRO-002 R2 can be improved by replacing "prevent identified events" with "prevent anticipated events". "Anticipated" aligns better with contingency analysis than "identified"</p> <p>Response: The SDT believes the commenter intended to be commenting upon IRO-001-2 R2 rather than IRO-002-2 R2. The SDT did indeed consider using the word "anticipated" rather than identified. However, the SDT believes that a decision cannot be made regarding whether to anticipate an event unless it is first identified through some method of assessment. Contingency analysis certainly can be one valid form useful in assessment. Since anything identified by such an assessment must be considered, the SDT believes the requirement should apply to what is</p>

Voter	Entity	Segment	Vote	Comment
				<p>identified, rather than the subjective decision of whether to expect or anticipate that which has been identified.</p> <p>IRO-005-4 R1 and R2 can be improved by replacing "expected" with "anticipated". Contingencies are not necessarily "expected"; however, we do "anticipate" them.</p> <p>Response: The SDT agrees and have revised the requirements per your suggestion.</p>
<p>Response: The RCSDT thanks you for your comment.</p>				

Randall McCamish	City of Vero Beach	1	Negative	<p>From the last posting to this posting, for COM-002-3 R2, the phrase "the accuracy of the message has been confirmed" was added to the second step of three part communication. "Accuracy" is not the correct term here. "Understanding" is a better term. It would seem that "accuracy" is a term to be used in R3, the third part of the 3-part communication so that the issuer of the directive ensures the accuracy of the recipients understanding. The City of Vero Beach (COVB) suggests changing COM-002-3 R2 to read: Each Balancing Authority, Transmission Operator, Generator Operator, Transmission Service Provider, Load-Serving Entity, Distribution Provider, and Purchasing-Selling Entity that is the recipient of a Reliability Directive issued per Requirement R1, shall repeat, restate, rephrase or recapitulate the Reliability Directive with enough details to clearly communicate the recipient's understanding of the Reliability Directive. The term "accuracy" can be interpreted as requiring the recipient to second-guess the Reliability Directive of the RC to enure the accuracy of the RC's directive in the first place. Under tight time constraints of Emergencies, this is not practical. We are sure that was not the intent of the drafting team.</p> <p>Response: The SDT, in drafting the proposed language, did indeed discuss using the word "understanding" rather than accuracy. However, the SDT was not able to identify a feasible measure for "understanding". A recipient can judge whether the response is accurate when compared with the communications issued, but cannot judge the understanding of anyone, even though the responder may have accurately responded.</p> <p>For IRO-001-2, COVB does not see a need for R1. Doesn't the ERO already have that authority to establish RC's through the registration process, and to certify system operators through the PER standards?</p> <p>Response: Many commenters suggested removing the requirement because it is addressed in the NERC Rules of Procedure. The RCSDT concurs and has removed R1 from IRO-001-2.</p> <p>IRO-014-2 R5, "impacted" was replaced with "other". Wouldn't it be better to at least limit the notification to within the same interconnection? Or is R5 truly to identify all NERC registered RC's?</p> <p>Response: This requirement continues the current practice of informing all RCs of Adverse Reliability Impacts (ARIs). Due to the nature of an ARI, this requirement is typically implemented as an RCIS message or a hotline call to all RC's. This is</p>
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				<p>intended to make all RCs aware of ARIs and support situational awareness.</p> <p>More minor comments/suggestions for improvement: IRO-002 R2 can be improved by replacing "prevent identified events" with "prevent anticipated events". "Anticipated" aligns better with contingency analysis than "identified"</p> <p>Response: The SDT believes the commenter intended to be commenting upon IRO-001-2 R2 rather than IRO-002-2 R2. The SDT did indeed consider using the word "anticipated" rather than identified. However, the SDT believes that a decision cannot be made regarding whether to anticipate an event unless it is first identified through some method of assessment. Contingency analysis certainly can be one valid form useful in assessment. Since anything identified by such an assessment must be considered, the SDT believes the requirement should apply to what is identified, rather than the subjective decision of whether to expect or anticipate that which has been identified.</p> <p>IRO-005-4 R1 and R2 can be improved by replacing "expected" with "anticipated". Contingencies are not necessarily "expected"; however, we do "anticipate" them.</p> <p>Response: The SDT agrees and have revised the requirements per your suggestion.</p>
<p>Response: The RCSDT thanks you for your comment.</p>				
John Allen	City Utilities of Springfield, Missouri	4	Negative	See comments from the SPP Standards Development group.
<p>Response: The RCSDT thanks you for your comment. Please see response to those comments.</p>				
Shaun Anders	City Water, Light & Power of Springfield	1	Negative	The definition of "Interpersonal Communications" is overly broad and does not address the functional needs of reliability coordination. The definition should be limited to systems utilized for essential reliability functions. While the Purpose statement in the standard does address this intent, the explicit inclusion in the definition removes all ambiguity. Further, the definition of "Alternative Interpersonal Communications" without corresponding explicit definition of Primary Interpersonal Communications may lead to confusion and unnecessary duplication of efforts in

				testing and maintenance.
<p>Response: The RCSDT thanks you for your comment. The certification of an entity as a functional entity by the ERO through its certification process will not take place unless the entity has the needed communications capabilities. If the entity cannot perform, it will not be registered. Once an entity is certified as a functional entity, then that entity must comply with all requirements applicable to that functional entity. These standard revisions establish clear requirements for alternative interpersonal communications capability which may or may not be part of the entity certification process. Taken together, the certification process and the Reliability Standards clearly establish the requirements for both normal interpersonal communications capability and alternative interpersonal communications capability.</p> <p>The RCSDT has revised the applicability of COM-001, and COM-002 such that they contain the same functional entities. These are: RC, TOP, BA, GOP, and DP.</p>				
Dave Hagen	Clearwater Power Co.	3	Negative	<p>Thank you for the opportunity to comment and for your hard work on this project: While we agree that effective Interpersonal Communications capability are integral to reliability, many Distribution Providers (DP) are small entities that do not maintain a 24-7 dispatch desk capable of receiving or responding to emergency reliability directives in a timely manner. It is our belief that some of the proposals in this project could unnecessarily force small entities to make investments that will not enhance reliability. Many DPs rely on answering services to address customer-service issues during non-business hours. On-call personnel are contacted in the event of an outage or emergency and crews are dispatched as appropriate. It is difficult to envision a BA or TOP issuing an Emergency Reliability Directive to a small entity (25 MW or so) which would require these smaller entities to comply with COM-001. Order 693 directs the inclusions of DPs in the COM-001-2 standard but it is our belief that the Commission offered language that GOs and DPs need not have redundant communications, training unrelated to normal/emergency operations, and that telecommunications requirements for entities will vary according to their function. We believe those intentions should be reflected in the language of this standard. We would suggest adding wording such as in the applicability section, "Distribution Providers who maintain a 24-7 control centers with the ability to manually shed load of at least 100 MW within a 15-minute operational window." Also, a note that smaller, rural entities can be dependent on a phone system provider that will not allow for backup communications. Should the communication line(s) be dependent on one main phone trunk line, the failure due to an issue on this main line will make it impossible to notify anyone of its failure short of physically traveling to an area where phone service is available. For some rural areas, this will exceed the one hour time limit to report the communication outage. Forcing smaller entities to acquire satellite phone service to mitigate for a phone outage is a high price to pay when no reliability improvement will be achieved. Suggested change could be: "... shall notify impacted entities within 60 minutes of the detection of a failure of its Interpersonal Communications capabilities</p>

				that lasts 30 minutes or longer where alternate forms of communication are available within a 15 minute access time. Should alternate forms of communication not be available within the 15 minute access time, then upon reestablishment of Communication capabilities impacted entities will be notified of the past loss and current status of Communication." We've heard many representatives from FERC and NERC indicate that the standards development process has led the industry to take action in many cases for the sake of compliance while not necessarily enhancing reliability. As has been stated many times, the process should be about improving reliability, not about complying with standards. Unnecessarily including smaller entities that will NEVER receive an emergency reliability directive might be an example of the former.
<p>Response: The RCSDT thanks you for your comment. There is no requirement for 24/7 support. The requirement is to have communications capability. The type of system (e.g., On-Call) is not prescribed in the standard, and the standard is designed not to impose needless communications requirements. The purpose of COM-002 is, "to ensure emergency communications between operating personnel are <u>effective</u>." It's not a proxy requirement to establish 24/7 operating personnel at small distribution providers. The intent is to establish a <u>method</u> of communicating Reliability Directives during Emergencies. While it is true that many small Distribution Providers are not staffed 24x7, it is typical that they have a means of communication - in many cases this may be via a receptionist or answering service. 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. If this return call would not be timely enough, then the issuer would determine a different mitigation plan.</p>				
Bruce Krawczyk	ComEd	3	Negative	Exelon is voting negative based on our previously submitted comments.
<p>Response: The RCSDT thanks you for your comment. Please see the response to those comments.</p>				
Christopher L de Graffenried	Consolidated Edison Co. of New York	1	Abstain	<p>o COM-002 assumes, but does not require, voice logs. This needs to be fixed. Otherwise the documentation could just be a paper log 'check box' entry which says "Yes, we used 3-part." This is not adequate, verifiable documentation for entity audits.</p> <p>Response: The standards establish "what" is required, not "how" to do it. The Measures identify methods which are examples of evidence that may be provided to demonstrate compliance, but requirements cannot be established in the measures. Further, valid requirements should not be established that preclude improvements that may arise through technological innovations or other equally effective alternatives. The state of the art at present would seem to indicate that the most prevalent evidence would likely come from a form of voice recordings or transcripts.</p>

				<p>o COM-002 only requires the entity maintain this documentation 3 months. This short retention time period expires long before most auditors check on the entity. So, why bother? This also needs to be fixed or clarified.</p> <p>Response: The retention time was established using the NERC Data Retention Guidelines and to recognize that vast amount of data which would have to be retained to present evidence. In addition, any event under investigation has likely been accompanied by a requirement to “freeze” data retention and keep all relevant information and date for a specified timeframe surrounding the event.</p>
<p>Response: The RCSDT thanks you for your comment.</p>				
Roman Gillen	Consumers Power Inc.	3	Negative	<p>Thank you for the opportunity to comment and for your hard work on this project: While we agree that effective Interpersonal Communications capability are integral to reliability, many Distribution Providers (DP) are small entities that do not maintain a 24-7 dispatch desk capable of receiving or responding to emergency reliability directives in a timely manner. It is our belief that some of the proposals in this project could unnecessarily force small entities to make investments that will not enhance reliability. Many DPs rely on answering services to address customer-service issues during non-business hours. On-call personnel are contacted in the event of an outage or emergency and crews are dispatched as appropriate. It is difficult to envision a BA or TOP issuing an Emergency Reliability Directive to a small entity (25 MW or so) which would require these smaller entities to comply with COM-001. Order 693 directs the inclusions of DPs in the COM-001-2 standard but it is our belief that the Commission offered language that GOs and DPs need not have redundant communications, training unrelated to normal/emergency operations, and that telecommunications requirements for entities will vary according to their function. We believe those intentions should be reflected in the language of this standard. We would suggest adding wording such as in the applicability section, "Distribution Providers who maintain a 24-7 control centers with the ability to manually shed load of at least 100 MW within a 15-minute operational window." Also, a note that smaller, rural entities can be dependent on a phone system provider that will not allow for backup communications. Should the communication line(s) be dependent on one main phone trunk line, the failure due to an issue on this main line will make it impossible to notify anyone of its failure short of physically traveling to an area where phone service is available. For some rural areas, this will exceed the one hour time limit to report the communication outage. Forcing smaller entities to acquire satellite phone service to mitigate for a phone outage is a high price to pay when no reliability improvement will be</p>

				<p>achieved. Suggested change could be: "... shall notify impacted entities within 60 minutes of the detection of a failure of its Interpersonal Communications capabilities that lasts 30 minutes or longer where alternate forms of communication are available within a 15 minute access time. Should alternate forms of communication not be available within the 15 minute access time, then upon reestablishment of Communication capabilities impacted entities will be notified of the past loss and current status of Communication." We've heard many representatives from FERC and NERC indicate that the standards development process has led the industry to take action in many cases for the sake of compliance while not necessarily enhancing reliability. As has been stated many times, the process should be about improving reliability, not about complying with standards. Unnecessarily including smaller entities that will NEVER receive an emergency reliability directive might be an example of the former.</p>
<p>Response: The RCSDT thanks you for your comment. There is no requirement for 24/7 support. The requirement is to have communications capability. The type of system (e.g., On-Call) is not prescribed in the standard, and the standard is designed not to impose needless communications requirements. The purpose of COM-002 is, "to ensure emergency communications between operating personnel are <u>effective</u>." It's not a proxy requirement to establish 24/7 operating personnel at small distribution providers. The intent is to establish a <u>method</u> of communicating Reliability Directives during Emergencies. While it is true that many small Distribution Providers are not staffed 24x7, it is typical that they have a means of communication - in many cases this may be via a receptionist or answering service. 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. If this return call would not be timely enough, then the issuer would determine a different mitigation plan.</p>				
Roger Meader	Coos-Curry Electric Cooperative, Inc	3	Negative	<p>Thank you for the opportunity to comment and for your hard work on this project: While we agree that effective Interpersonal Communications capability are integral to reliability, many Distribution Providers (DP) are small entities that do not maintain a 24-7 dispatch desk capable of receiving or responding to emergency reliability directives in a timely manner. It is our belief that some of the proposals in this project could unnecessarily force small entities to make investments that will not enhance reliability. Many DPs rely on answering services to address customer-service issues during non-business hours. On-call personnel are contacted in the event of an outage or emergency and crews are dispatched as appropriate. It is difficult to envision a BA or TOP issuing an Emergency Reliability Directive to a small entity (25 MW or so) which would require these smaller entities to comply with COM-001. Order 693 directs the inclusions of DPs in the COM-001-2 standard but it is our belief that the Commission offered language that GOs and DPs need not have redundant communications, training unrelated to normal/emergency operations, and that telecommunications requirements for entities will vary according to their function. We believe those intentions should be reflected in the language of this standard. We would suggest adding wording such as in the applicability section, "Distribution Providers who maintain a 24-7 control centers</p>

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<p>Response: The RCSDT thanks you for your comment. There is no requirement for 24/7 support. The requirement is to have communications capability. The type of system (e.g., On-Call) is not prescribed in the standard, and the standard is designed not to impose needless communications requirements. The purpose of COM-002 is, "to ensure emergency communications between operating personnel are <u>effective</u>." It's not a proxy requirement to establish 24/7 operating personnel at small distribution providers. The intent is to establish a <u>method</u> of communicating Reliability Directives during Emergencies. While it is true that many small Distribution Providers are not staffed 24x7, it is typical that they have a means of communication - in many cases this may be via a receptionist or answering service. 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. If this return call would not be timely enough, then the issuer would determine a different mitigation plan.</p>				
Russell A Noble	Cowlitz County PUD	3	Negative	<p>COM-001 presents problems for smaller entities that do not have any other option for communications other than the failed communication line. The SDT should consider exempting such entities, requiring them to contact others to inform of their failed one and only communication option is a catch-22.</p> <p>COM-002 does not adequately provide for effective communication with smaller entities that do not have 24-7 control/dispatch functions. The directing entity issuing Reliability Directives must contact competent personnel. The SDT's reference to</p>

				<p>the PER requirements falls very short in addressing this problem as the DPs and LSEs are not even applicable to the suggested standards. Again, the SDT should consider certain exemptions for such entities. Please note that FERC itself noted that “a Reliability Standard may take into account the size of the entity that must comply and the costs of implementation...”...the Commission clarifies that it did not intend to ... impose new organizational structures...” and also “[w]e expect the communication requirements for all applicable entities will vary according to their roles and that these requirements will be developed under the Reliability Standards development process.” Although the STD did not include all applicable entities to have backup communications, it failed to see the limitations of such entities without backup communications impeding their ability to comply with other requirements.</p>
<p>Response: The RCSDT thanks you for your comment. There is no requirement for 24/7 support. The requirement is to have communications capability. The type of system (e.g., On-Call) is not prescribed in the standard, and the standard is designed not to impose needless communications requirements. The purpose of COM-002 is, “to ensure emergency communications between operating personnel are <u>effective</u>.” It’s not a proxy requirement to establish 24/7 operating personnel at small distribution providers. The intent is to establish a <u>method</u> of communicating Reliability Directives during Emergencies. While it is true that many small Distribution Providers are not staffed 24x7, it is typical that they have a means of communication - in many cases this may be via a receptionist or answering service. 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. If this return call would not be timely enough, then the issuer would determine a different mitigation plan.</p>				
Rick Syring	Cowlitz County PUD	4	Negative	<p>COM-001 presents problems for smaller entities that do not have any other option for communications other than the failed communication line. The SDT should consider exempting such entities, requiring them to contact others to inform of their failed one and only communication option is a catch-22.</p> <p>COM-002 does not adequately provide for effective communication with smaller entities that do not have 24-7 control/dispatch functions. The directing entity issuing Reliability Directives must contact competent personnel. The SDT’s reference to the PER requirements falls very short in addressing this problem as the DPs and LSEs are not even applicable to the suggested standards. Again, the SDT should consider certain exemptions for such entities. Please note that FERC itself noted that “a Reliability Standard may take into account the size of the entity that must comply and the costs of implementation...”...the Commission clarifies that it did not intend to ... impose new organizational structures...” and also “[w]e expect the communication requirements for all applicable entities will vary according to their roles and that these requirements will be developed under the Reliability Standards development process.” Although the STD did not include all applicable entities to have backup communications, it failed to see the limitations of such entities without backup communications impeding their ability to comply with other requirements.</p>

Response: The RCSDT thanks you for your comment. There is no requirement for 24/7 support. The requirement is to have communications capability. The type of system (e.g., On-Call) is not prescribed in the standard, and the standard is designed not to impose needless communications requirements. The purpose of COM-002 is, “to ensure emergency communications between operating personnel are effective.” It’s not a proxy requirement to establish 24/7 operating personnel at small distribution providers. The intent is to establish a method of communicating Reliability Directives during Emergencies. While it is true that many small Distribution Providers are not staffed 24x7, it is typical that they have a means of communication - in many cases this may be via a receptionist or answering service. 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. If this return call would not be timely enough, then the issuer would determine a different mitigation plan.

Bob Essex	Cowlitz County PUD	5	Negative	COM-001 presents problems for smaller entities that do not have any other option for communications other than the failed communication line. The SDT should consider exempting such entities, requiring them to contact others to inform of their failed one and only communication option is a catch-22. COM-002 does not adequately provide for effective communication with smaller entities that do not have 24-7 control/dispatch functions. The directing entity issuing Reliability Directives must contact competent personnel. The SDT’s reference to the PER requirements falls very short in addressing this problem as the DPs and LSEs are not even applicable to the suggested standards. Again, the SDT should consider certain exemptions for such entities. Please note that FERC itself noted that “a Reliability Standard may take into account the size of the entity that must comply and the costs of implementation...” “...the Commission clarifies that it did not intend to ... impose new organizational structures...” and also “[w]e expect the communication requirements for all applicable entities will vary according to their roles and that these requirements will be developed under the Reliability Standards development process.” Although the STD did not include all applicable entities to have backup communications, it failed to see the limitations of such entities without backup communications impeding their ability to comply with other requirements.
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Dave Sabala	Douglas Electric Cooperative	3	Negative	Thank you for the opportunity to comment and for your hard work on this project: While we agree that effective Interpersonal Communications capability are integral to reliability, many Distribution Providers (DP) are small entities that do not maintain a 24-7 dispatch desk capable of receiving or responding to emergency reliability
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				<p>directives in a timely manner. It is our belief that some of the proposals in this project could unnecessarily force small entities to make investments that will not enhance reliability. Many DPs rely on answering services to address customer-service issues during non-business hours. On-call personnel are contacted in the event of an outage or emergency and crews are dispatched as appropriate. It is difficult to envision a BA or TOP issuing an Emergency Reliability Directive to a small entity (25 MW or so) which would require these smaller entities to comply with COM-001. Order 693 directs the inclusions of DPs in the COM-001-2 standard but it is our belief that the Commission offered language that GOs and DPs need not have redundant communications, training unrelated to normal/emergency operations, and that telecommunications requirements for entities will vary according to their function. We believe those intentions should be reflected in the language of this standard. We would suggest adding wording such as in the applicability section, "Distribution Providers who maintain a 24-7 control centers with the ability to manually shed load of at least 100 MW within a 15-minute operational window." Also, a note that smaller, rural entities can be dependent on a phone system provider that will not allow for backup communications. Should the communication line(s) be dependent on one main phone trunk line, the failure due to an issue on this main line will make it impossible to notify anyone of its failure short of physically traveling to an area where phone service is available. For some rural areas, this will exceed the one hour time limit to report the communication outage. Forcing smaller entities to acquire satellite phone service to mitigate for a phone outage is a high price to pay when no reliability improvement will be achieved. Suggested change could be: "... shall notify impacted entities within 60 minutes of the detection of a failure of its Interpersonal Communications capabilities that lasts 30 minutes or longer where alternate forms of communication are available within a 15 minute access time. Should alternate forms of communication not be available within the 15 minute access time, then upon reestablishment of Communication capabilities impacted entities will be notified of the past loss and current status of Communication." We've heard many representatives from FERC and NERC indicate that the standards development process has led the industry to take action in many cases for the sake of compliance while not necessarily enhancing reliability. As has been stated many times, the process should be about improving reliability, not about complying with standards. Unnecessarily including smaller entities that will NEVER receive an emergency reliability directive might be an example of the former.</p>
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Henry Ernst-Jr	Duke Energy Carolina	3	Negative	<p>o We question how far the definition of Alternative Interpersonal Communication goes in requiring separate infrastructure from Interpersonal Communication. For example, wireless communications sometime utilize fiber optic networks.</p> <p>Response: The definition requires the use of different infrastructure (medium) than the Interpersonal Communication used for day to day operations. The RCSDT does not believe it is appropriate to be prescriptive with respect to the specific medium employed. This is intended to apply to assets and access to media that is under your control. For example, the way cell phone signals are routed are not under your control.</p> <p>o We question why the requirements state that entities must “have” Interpersonal Communications capability, but must “designate” Alternative Interpersonal Communications capability?</p> <p>Response: Many entities have multiple Alternative Interpersonal Communication capabilities. Large entities may have a second land line, cell phone, satellite phone, etc. The purpose of “designating” the Alternative is so that other entities know which one is in use and is a reliable means of communications. Allowing them to designate which one they want to employ allows for flexibility in which one they use for AIC.</p> <p>o R1.2 and R2.2 - Why is this limited to the same interconnection?</p> <p>Response: The phrase “within the same interconnection” is added for the case of ERCOT which has only DC tie lines with the Eastern Interconnection and has minimal interchange.</p> <p>o R3 - need to add neighboring TOPs.</p> <p>Response: Agreed. The standard has been modified as suggested.</p> <p>o R5 - need to add adjacent BAs.</p> <p>Response: Agreed. The standard has been modified as suggested.</p> <p>o Interchange Coordinator - Add IC to the Applicability Section, and add a requirement that the IC have Interpersonal Communication capability with its BA and adjacent BAs.</p> <p>Response: We eliminated the Interchange Coordinator from COM-001-2 based</p>
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				<p>on stakeholder feedback.</p> <p>o Requirements to “designate” Alternative Interpersonal Communication should carry a “Medium” VRF instead of “High”, because they are a backup capability. The word “designate” carries the connotation that these are documentation requirements.</p> <p>Response: While the requirement is phrased to focus on the documentation, the reliability objective is that the entity has an alternative communication capability with those functional entities most critical to its real-time operations.</p> <p>o R9 requires a monthly test of Alternative Interpersonal Communications capability. This was quarterly in the last draft. We question how these requirements for “Alternative Interpersonal Communications” capability are related to requirements for “backup functionality” in EOP-008-1, which requires an annual test of backup functionality. Clarity on the relationship between “Interpersonal Communications”, “Alternative Interpersonal Communications”, “primary control center functionality” and “backup control center functionality” would be appreciated.</p> <p>Response: Interpersonal Communication and Alternative Interpersonal Communication are not related to EOP-008. The provision to test may be performed through day to day use of the capability.</p>
<p>Response: The RCSDT thanks you for your comment. Please see responses above.</p>				
George S. Carruba	East Kentucky Power Coop.	1	Negative	As currently written, IRO-014 could be interpreted that if a RC identifies an adverse reliability impact in another RC and the other RC does not agree with the findings, the RC who identified the adverse reliability impact would be responsible for creating a mitigation plan to address the issue. This may not be possible if the identifying RC does not have agreements in place with the TOPs/BAs in the other RC area.
<p>Response: The RCSDT thanks you for your comment. IRO-014-2 requirement R6, requires all RCs to operate as if the problem exists even when they disagree with the RC that identified the problem. Even if there is a disagreement between RCs, R8 still requires that all RCs comply with the action plan developed by the RC that identified the adverse reliability impact unless compliance with the action plan would violate safety, equipment, regulatory or statutory requirements. As envisioned, the TOPs and BAs would receive operating instructions from their own RC, not from the RC in another Reliability Coordinator Area.</p>				
Sally Witt	East Kentucky Power Coop.	3	Negative	As currently written it could be interpreted that if an RC identifies an Adverse reliability Impact in another RC Area and they do not agree with the findings, the

				RC who identified the adverse reliability Impact would be responsible for creating a mitigation plan to address the issue. This may not be feasible if the identifying RC does not have agreements in place with TOPs/BAs in the other RC Area.
<p>Response: The RCSDT thanks you for your comment. IRO-014-2 requirement R6, requires all RCs to operate as if the problem exists even when they disagree with the RC that identified the problem. Even if there is a disagreement between RCs, R8 still requires that all RCs comply with the action plan developed by the RC that identified the adverse reliability impact unless compliance with the action plan would violate safety, equipment, regulatory or statutory requirements. As envisioned, the TOPs and BAs would receive operating instructions from their own RC, not from the RC in another Reliability Coordinator Area.</p>				
John R Cashin	Electric Power Supply Association	5	Affirmative	I will be submitting comments in the regular form tomorrow.
<p>Response: The RCSDT thanks you for your comment. Please see response to those comments.</p>				
Chuck B Manning	Electric Reliability Council of Texas, Inc.	2	Negative	We agree with the comments submitted by the IRC SRC and we have submitted those same comments.
<p>Response: The RCSDT thanks you for your comment. Please see response to those comments.</p>				
Martin Kaufman	ExxonMobil Research and Engineering	5	Negative	The Measurement 2 of COM-002-3 has the potential to create numerous violations without any reliability impact to the Bulk Electric System. Specifically, for those facilities without voice recording equipment, the requirement to record in an operator log that the BA/GOP/TOP/TSP repeated the intent of a directive back to the RC provides no benefit to the reliability of the BES and adds a situation where an entity can be found non-compliant by an RE with zero impact to the reliability of the BES. In response to a directive from an RC, it's important for the reliability of the BES for a facility to identify an instruction as a directive, resolve whether the facility can comply with the directive, and inform the RC when it could not comply with the directive. Documentation requirements should reflect these three items.
<p>Response: The RCSDT thanks you for your comment. Based on comments from other stakeholders, the SDT has removed the TSP, LSE and PSE from responsibility for any of the requirements in COM-002. As envisioned, in an emergency the RC would issue most Reliability Directives to its BAs and TOPs, and there may be times when the RC bypasses its TOPs and BAs and issues a Reliability Directive to its DPs</p>				

and GOPS. The RC would not, however, issue a Reliability Directive to TSPs, LSEs, or PSEs.

Note that M2 only requires that the recipient document that it repeated the reliability directive. Collectively, the three measures do what you have proposed – they require that the applicable entities document that the three parts of the communication took place – original issuance; accurate repeat; confirmation. Operating logs are offered as one form of acceptable evidence – but other types of evidence could also be used to demonstrate compliance.

Bryan Case	Fall River Rural Electric Cooperative	3	Negative	<p>Thank you for the opportunity to comment and for your hard work on this project: While we agree that effective Interpersonal Communications capability are integral to reliability, many Distribution Providers (DP) are small entities that do not maintain a 24-7 dispatch desk capable of receiving or responding to emergency reliability directives in a timely manner. It is our belief that some of the proposals in this project could unnecessarily force small entities to make investments that will not enhance reliability. Many DPs rely on answering services to address customer-service issues during non-business hours. On-call personnel are contacted in the event of an outage or emergency and crews are dispatched as appropriate. It is difficult to envision a BA or TOP issuing an Emergency Reliability Directive to a small entity (25 MW or so) which would require these smaller entities to comply with COM-001. Order 693 directs the inclusions of DPs in the COM-001-2 standard but it is our belief that the Commission offered language that GOs and DPs need not have redundant communications, training unrelated to normal/emergency operations, and that telecommunications requirements for entities will vary according to their function. We believe those intentions should be reflected in the language of this standard. We would suggest adding wording such as in the applicability section, "Distribution Providers who maintain a 24-7 control centers with the ability to manually shed load of at least 100 MW within a 15-minute operational window." Also, a note that smaller, rural entities can be dependent on a phone system provider that will not allow for backup communications. Should the communication line(s) be dependent on one main phone trunk line, the failure due to an issue on this main line will make it impossible to notify anyone of its failure short of physically traveling to an area where phone service is available. For some rural areas, this will exceed the one hour time limit to report the communication outage. Forcing smaller entities to acquire satellite phone service to mitigate for a phone outage is a high price to pay when no reliability improvement will be achieved. Suggested change could be: "... shall notify impacted entities within 60 minutes of the detection of a failure of its Interpersonal Communications capabilities that lasts 30 minutes or longer where alternate forms of communication are available within a 15 minute access time. Should alternate forms of communication not be available within the 15 minute access time, then upon reestablishment of</p>
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<p>Response: The RCSDT thanks you for your comment. There is no requirement for 24/7 support. The requirement is to have communications capability. The type of system (e.g., On-Call) is not prescribed in the standard, and the standard is designed not to impose needless communications requirements. The purpose of COM-002 is, "to ensure emergency communications between operating personnel are <u>effective</u>." It's not a proxy requirement to establish 24/7 operating personnel at small distribution providers. The intent is to establish a <u>method</u> of communicating Reliability Directives during Emergencies. While it is true that many small Distribution Providers are not staffed 24x7, it is typical that they have a means of communication - in many cases this may be via a receptionist or answering service. 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. If this return call would not be timely enough, then the issuer would determine a different mitigation plan.</p>				
Robert Martinko	FirstEnergy Energy Delivery	1	Affirmative	FirstEnergy supports the proposed standards and would appreciate consideration of our comments submitted through the formal comment period.
<p>Response: The RCSDT thanks you for your comment. Please see response to those comments.</p>				
Kevin Query	FirstEnergy Solutions	3	Affirmative	FirstEnergy supports the proposed standards and would appreciate consideration of our comments submitted through the formal comment period.
<p>Response: The RCSDT thanks you for your comment. Please see response to those comments.</p>				
Mark S Travaglianti	FirstEnergy Solutions	6	Affirmative	FirstEnergy supports the proposed standards and would appreciate consideration of our comments submitted through the formal comment period.
<p>Response: The RCSDT thanks you for your comment. Please see response to those comments.</p>				
Frank Gaffney	Florida Municipal	4	Negative	From the last posting to this posting, for COM-002-3 R2, the phrase "the accuracy of the message has been confirmed" was added to the second step of three part

	Power Agency		<p>communication. "Accuracy" is not the correct term here. "Understanding" is a better term. It would seem that "accuracy" is a term to be used in R3, the third part of the 3-part communication so that the issuer of the directive ensures the accuracy of the recipients understanding. FMPA suggests changing COM-002-3 R2 to read: Each Balancing Authority, Transmission Operator, Generator Operator, Transmission Service Provider, Load-Serving Entity, Distribution Provider, and Purchasing-Selling Entity that is the recipient of a Reliability Directive issued per Requirement R1, shall repeat, restate, rephrase or recapitulate the Reliability Directive with enough details to clearly communicate the recipient's understanding of the Reliability Directive. The term "accuracy" can be interpreted as requiring the recipient to second-guess the Reliability Directive of the RC to ensure the accuracy of the RC's directive in the first place. Under tight time constraints of Emergencies, this is not practical. We assume that was not the intent of the drafting team.</p> <p>Response: The SDT, in drafting the proposed language, did indeed discuss using the word "understanding" rather than accuracy. However, the SDT was not able to identify a feasible measure for "understanding". A recipient can judge whether the response is accurate when compared with the communications issued, but cannot judge the understanding of anyone, even though the responder may have accurately responded.</p> <p>For IRO-001-2, FMPA does not see a need for R1. Doesn't the ERO already have that authority to establish RC's through the registration process, and to certify system operators through the PER standards?</p> <p>Response: Many commenters suggested removing the requirement because it is addressed in the NERC Rules of Procedure. The RCSDT concurs and has removed R1 from IRO-001-2.</p> <p>IRO-014-2 R5, "impacted" was replaced with "other". Wouldn't it be better to at least limit the notification to within the same interconnection? Or is R5 truly to identify all NERC registered RC's?</p> <p>Response: This requirement continues the current practice of informing all RCs of Adverse Reliability Impacts (ARIs). Due to the nature of an ARI, this requirement is typically implemented as an RCIS message or a hotline call to all RC's. This is intended to make all RCs aware of ARIs and support situational awareness.</p> <p>More minor comments / suggestions for improvement: IRO-002 R2 can be</p>
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				<p>improved by replacing "prevent identified events" with "prevent anticipated events". "Anticipated" aligns better with contingency analysis than "identified"</p> <p>Response: The SDT believes the commenter intended to be commenting upon IRO-001-2 R2 rather than IRO-002-2 R2. The SDT did indeed consider using the word "anticipated" rather than identified. However, the SDT believes that a decision cannot be made regarding whether to anticipate an event unless it is first identified through some method of assessment. Contingency analysis certainly can be one valid form useful in assessment. Since anything identified by such an assessment must be considered, the SDT believes the requirement should apply to what is identified, rather than the subjective decision of whether to expect or anticipate that which has been identified.</p> <p>IRO-005-4 R1 and R2 can be improved by replacing "expected" with "anticipated". Contingencies are not necessarily "expected"; however, we do "anticipate" them.</p> <p>Response: The SDT agrees and have revised the requirements per your suggestion.</p>
<p>Response: The RCSDT thanks you for your comment.</p>				
Thomas E Washburn	Florida Municipal Power Pool	6	Negative	<p>From the last posting to this posting, for COM-002-3 R2, the phrase "the accuracy of the message has been confirmed" was added to the second step of three part communication. "Accuracy" is not the correct term here. "Understanding" is a better term. It would seem that "accuracy" is a term to be used in R3, the third part of the 3-part communication so that the issuer of the directive ensures the accuracy of the recipients understanding. FMPA suggests changing COM-002-3 R2 to read: Each Balancing Authority, Transmission Operator, Generator Operator, Transmission Service Provider, Load-Serving Entity, Distribution Provider, and Purchasing-Selling Entity that is the recipient of a Reliability Directive issued per Requirement R1, shall repeat, restate, rephrase or recapitulate the Reliability Directive with enough details to clearly communicate the recipient's understanding of the Reliability Directive.. The term "accuracy" can be interpreted as requiring the recipient to second-guess the Reliability Directive of the RC to ensure the accuracy of the RC's directive in the first place. Under tight time constraints of Emergencies, this is not practical. We are sure that was not the intent of the drafting team.</p> <p>Response: The SDT, in drafting the proposed language, did indeed discuss using the word "understanding" rather than accuracy. However, the SDT was not able to identify a feasible measure for "understanding". A recipient can judge whether the</p>

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				suggestion.
Response: The RCSDT thanks you for your comment.				
Silvia P. Mitchell	Florida Power & Light Co.	6	Negative	<p>8) Question 1</p> <p>1. Do you agree with COM-001 requirements for Interpersonal Communications capability and Alternative Interpersonal Communications capability (R1-R8)? If not, please explain in the comment area below. No</p> <p>9) Question 1 Comments: As drafted, COM-001 is not clear or complete. At this stage in the evolution of compliance with the mandatory Reliability Standards, it is important that any new or revised Reliability Standard clearly articulate all compliance obligations and tasks consistent with Sections 302 (6) and (8) of the NERC Rules of Procedure. Thus, NextEra Energy Inc. (NextEra) has numerous recommended corrections to provide clarity and completeness to COM-001. For example, the requirement to designate an Alternative Interpersonal Communication capability is not clear. Does the designator solely designate for the designator's knowledge or does the designator need to inform the entity on the other end of the connection.</p> <p>In R2, for instance, the Reliability Coordinator must designate, but it is also not clear whether the Reliability Coordinator must inform the Balancing Authorities or Transmission Operators. It is further unclear whether the designation must be documented, or if any informing of the Balancing Authorities or Transmission Operators must be documented. Thus, it is recommended that the drafters decide what was intended regarding the designation and clearly state the requirements.</p> <p>In R9 it states that “. . . on at least a monthly basis.” There are two issues to consider here. If the sentence stays, grammatically it should read “. . . on, at least, a monthly basis. . .” However, from a compliance and technical perspective, the term “at least” has no significance and should be deleted. The requirement is to test on a monthly basis - the phrase “at least” only introduces ambiguity and implies that the party should consider every two or three weeks. If the drafting team believes a best practice is less than a month, there are other NERC educational tools to explain a best practice.</p> <p>In R10, it states “. . . shall notify the impacted entity . . .” It would be clearer to state: “. . . shall notify the impacted Reliability Coordinator, Transmission Operator, Balancing Authority, Distribution Provider or Generator Operator . . .” Page 6</p>

			<p>Response: The Requirement R2 is for the RC to designate an AIC and inform the other entity (BA, TOP, etc.) as to what that AIC is. The Measure M2 provides examples of the types of evidence which may be used to prove compliance with the requirement.</p> <p>The RCSDT believes that stakeholders are satisfied with the wording of the requirements of this standard. The phrase “at least” was included to relay the intent – that the monthly requirement is a minimum, and some entities may wish to perform this more frequently. It does not add any compliance obligation to perform this activity more frequently than specified.</p> <p>For R10, the RCSDT believes that the existing language is sufficiently clear.</p> <p>10) Question 2 2. The RCSDT believes that the requirements of TOP-001-1 obviate the need to develop additional requirements to address Xcel’s comment. Do you agree? If not, please explain in the comment area below. No</p> <p>11) Question 2 Comments: As stated in response to number 1, Reliability Standards are to be clear and complete. If a Transmission Operator is not responsible for a delay caused by a Reliability Coordinator, the Standard should specifically state that the Transmission Operator does not need to wait for an assessment or approval of a Reliability Coordinator to take actions pursuant to TOP-001-1 R3. Since the Reliability Coordinator is atop the reliability higherachy, such a statement provides clarity and completeness to understanding a Transmission Operators rights. Thus, TOP-001-1 R3 should be revised to lead with: “Without any obligation to first seek and obtain an assessment or approval from its Reliability Coordinator, each Transmission Operator” Page 10</p> <p>Response: The SDT thanks you for your comment. The RTO SDT proposes to retire TOP-001-1 R3. However, since NERC has retired IRO-004-1 R3 and R5 along with IRO-005-3 R5 , there are no longer any requirements that would force a TOP to wait for a delayed RC response during an emergency, therefore the question is resolved, albeit differently than it was proposed to be resolved in this posting. If an RC were to give a Reliability Directive to a TOP that the TOP considered “would violate safety, equipment, regulatory, or statutory requirements”, the TOP may respond to the RC that it cannot comply.</p> <p>12) Question 6 Comments: At this stage in evolution of compliance with the mandatory Reliability Standards, it is important that any new or revised Reliability Standard clearly articulate all compliance obligations and tasks consistent with Sections 302 (6) and (8) of the NERC Rules of Procedure. COM-002, IRO-001, IRO-002 and IRO-014 do not meet this threshold. Thus, NextEra has numerous recommended corrections to provide clarity and completeness to these Reliability</p>
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			<p>Standards. COM-002 R1 The addition of defined terms for Reliability Directive and Emergency is a very good approach that helps provides clarity. Hence, it is also be appropriate to make the language in the requirement as clear as possible, and not add other implied or unexplained notions. Also, at times, in those regions with markets, it is not always clear whether a requirement to curtail for reliability reasons is being issued pursuant to market rules or from the Reliability Coordinator or Transmission Operator under the Reliability Standards. Therefore, it is also appropriate that the Reliability Coordinator, Transmission Operator, Balancing Authority be required to identify themselves;, and if they fail to identify themselves or fail to use the term Reliability Directive, the registered entity receiving the flawed issuance should not be consider in violation of a Reliability Standard for failing to act. Accordingly, R1 would be clearer and have the same intent, if it stated as follows: “A Reliability Coordinator, Transmission Operator or Balancing Authority have the authority to issue an oral or written Reliability Directive as authorized in [list the specific Reliability Standard requirements such as IRO-001 R8 and TOP-001 R3]. The issuance of an oral of written Reliability Directive, by a Reliability Coordinator, Transmission Operator or Balancing Authority shall: (1) use the term ‘Reliability Directive;’ and (2) identify the issuer of the Reliability Directive as a Reliability Coordinator, Transmission Operator or Balancing Authority. If a Reliability Coordinator, Transmission Operator or Balancing Authority issues an oral or writtern directive without using the term “Reliability Directive” or failing to indentify itself as a Reliability Coordinator, Transmission Operator or Balancing Authority, the registered entity receiving the directive cannot be considered in violation for its failure to act.”</p> <p>Response: There is a new standard under development (COM-003) that is addressing a broader range of communications protocols, and has proposed a requirement for the Reliability Coordinator to announce his/her title when issuing alerts and other types of announcements.</p> <p>IRO-001 The definition of Adverse Reliability Impacts uses the term “instability.” It is important that this term be technically defined in the same way “Cascading” is defined, otherwise the new requirement is not adding clarity; rather, it is maintaining the ambiguous term “instability” that will likely lead to confusion and debate.</p> <p>Response: The term, ‘instability’ is already used in many reliability standards.</p> <p>R1 Similar to the comments set forth with respect to COM-001 (question #1), the term “at least” should be deleted from R1 - it serves no useful purpose from a technical or compliance perspective; instead, it will add unnecessary ambiguity to the requirement.</p> <p>Response: The phrase, “at least” was included to relay the intent – that the monthly requirement is a minimum, and some entities may wish to perform this</p>
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				<p>more frequently. It does not add any compliance obligation to perform this activity more frequently than specified.</p> <p>R2, as drafted, states: “Each Reliability Coordinator shall take actions or direct actions, which could include issuing oral or written Reliability Directives, of Transmission Operators, Balancing Authorities, Generator Operators, Interchange Coordinators and Distribution Providers within its Reliability Coordinator Area to prevent identified events or mitigate the magnitude or duration of actual events that result in Adverse Reliability Impacts. “ This long sentence has several significant grammatical errors that result in the reader not being able to discern the meaning of the requirement. It also unnecessarily adds verbiage that detracts from its primary focus. It is, therefore, recommended that R2 be revised as follows: “Each Reliability Coordinator shall take all necessary actions to prevent identified Emergencies or Adverse Reliability Impacts. These Reliability Coordinator actions shall include, to the extent necessary, the issuing of oral or written Reliability Directives to Transmission Operators, Balancing Authorities, Generator Operators, Interchange Coordinators and Distribution Providers located within its Reliability Coordinator Area. “</p> <p>Response: The SDT has considered the alternative language proposed and finds that the— the phrase, ‘all necessary action’ is ambiguous. Who would decide that ‘all necessary action’ had been taken?</p> <p>R3, as drafted, is confusing and inconsistent with R2, and, thus, R3 should be revised to read as follows: “Upon receipt of a Reliability Directive issued pursuant to R2, a Transmission Operator, Balancing Authority, Generator Operator, Interchange Coordinator and Distribution Provider shall comply with the Reliability Directive, unless compliance would violate safety, equipment, regulatory or statutory requirements. In the event that a Transmission Operator, Balancing Authority, Generator Operator, Interchange Coordinator or Distribution Provider determines that compliance with a Reliability Directive would violate safety, equipment, regulatory or statutory requirements, the Transmission Operator, Balancing Authority, Generator Operator, Interchange Coordinator or Distribution Provider shall, within 10 minutes after the determination, inform the Reliability Coordinator of its inability to comply.”</p> <p>Response: The team adopted the intent of part of this suggestion by replacing the word, ‘per’ with, ‘in accordance with’. The team elected not to add a time constraint because the proposed time constraint implies that it would be acceptable to delay up to 10 minutes before notifying the RC – and in some instances this time delay</p>
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				<p>could result in and adverse impact to reliability.</p> <p>IRO-002R1 and R2, as written, are confusing. It is recommended that R1 and R2 be combined to read as follows: “Pursuant to a written procedure to mitigate the impact of a Reliability Coordinator’s analysis tool outage, a Reliability Coordinator’s System Operator shall also have the authority to approve, deny or cancel a planned outage for its analysis tool.”</p> <p>Response: The drafting team believes that the language in the proposed standard is clear as written. No reason has been provided for merging the two requirements, and the benefit of merging the requirements is not clear.</p> <p>IRO-014 It is unclear why the terms Operating Procedure, Operating Process or Operating Plan needs to be plural, as currently written in the Standard. Hence, it is recommended that these terms be made singular, otherwise a violation may be inferred for not having more than one Procedure, Process or Plan.</p> <p>Response: The range of activities that must be addressed by the documents is expected to require more than one document, thus the use of the plural versions of these terms.</p> <p>Insert the word “applicable” before “Reliability Coordinator.”</p> <p>Response: The benefit of adding the word ‘applicable’ is not clear.</p> <p>2.1, as written, is confusing. Recommend that 2.1 read as follows:”Review and update, if an update is necessary, on an annual basis. Annual basis means the review shall be within one month plus or minus that date of the last review.”</p> <p>Response: The 15 month interval was recommended by the compliance program as the outer bound to recommend in standards that use the term, “annual” or “annually.”</p> <p>There is a compliance bulletin on this issue.</p> <p>R3 This requirement uses a very vague term “reliability-related information,” which, also, does not track the language used in R1 -- “information.” It is recommended that R1 and R3 use the same terms and read “ . . . information, as defined by the Reliability Coordinator, . . . “</p> <p>Response: Requirement R1 is not open-ended – it identifies information needed for Interconnection reliability. R3 points to the information identified by complying with R1. The intent was to limit the scope to areas needed for reliability. RCs may want other information for reasons not related to reliability, and that information is outside the scope of this standard.</p> <p>R4 As stated above, “at least” does not add value, and, therefore, should be</p>
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				<p>deleted.</p> <p>Response: The phrase, “at least” was included to relay the intent – that the monthly requirement is a minimum, and some entities may wish to perform this more frequently. It does not add any compliance obligation to perform this activity more frequently than specified.</p> <p>R5, as written, is confusing. The recommended fix is to delete “all other” and replace with “impacted”.</p> <p>Response: The SDT did intend that all other RCs be notified. This requirement continues the current practice of informing all RCs of Adverse Reliability Impacts (ARIs). Due to the nature of an ARI, this requirement is typically implemented as an RCIS message or a hotline call to all RC’s. This is intended to make all RCs aware of ARIs and support situational awareness.</p>
<p>Response: The RCSDT thanks you for your comment. Please see responses above.</p>				
Thomas W. Richards	Fort Pierce Utilities Authority	4	Negative	<p>From the last posting to this posting, for COM-002-3 R2, the phrase "the accuracy of the message has been confirmed" was added to the second step of three part communication. "Accuracy" is not the correct term here. "Understanding" is a better term. It would seem that "accuracy" is a term to be used in R3, the third part of the 3-part communication so that the issuer of the directive ensures the accuracy of the recipients understanding. FPUA suggests changing COM-002-3 R2 to read: Each Balancing Authority, Transmission Operator, Generator Operator, Transmission Service Provider, Load-Serving Entity, Distribution Provider, and Purchasing-Selling Entity that is the recipient of a Reliability Directive issued per Requirement R1, shall repeat, restate, rephrase or recapitulate the Reliability Directive with enough details to clearly communicate the recipient's understanding of the Reliability Directive.. The term "accuracy" can be interpreted as requiring the recipient to second-guess the Reliability Directive of the RC to enure the accuracy of the RC's directive in the first place. Under tight time constraints of Emergencies, this is not practical. We are sure that was not the intent of the drafting team.</p> <p>Response: The RCSDT revised the requirement as follows to remove the “accuracy” language:</p> <p>R2. Each Balancing Authority, Transmission Operator, Generator</p>

				<p>Operator, and Distribution Provider that is the recipient of a Reliability Directive issued per Requirement R1, shall repeat, restate, rephrase or recapitulate the Reliability Directive.</p> <p>For IRO-001-2, FPUA does not see a need for R1. Doesn't the ERO already have that authority to establish RC's through the registration process, and to certify system operators through the PER standards?</p> <p>Response: Many commenters suggested removing the requirement because it is addressed in the NERC Rules of Procedure. The RCSDT concurs and has removed R1 from IRO-001-2.</p> <p>IRO-014-2 R5, "impacted" was replaced with "other". Wouldn't it be better to at least limit the notification to within the same interconnection? Or is R5 truly to identify all NERC registered RC's?</p> <p>Response: This requirement continues the current practice of informing all RCs of ARIs. Due to the nature of an ARI, this requirement is typically implemented as an RCIS message or a hotline call to all RC's. This is intended to make all RCs aware of ARIs and support situational awareness.</p> <p>More minor comments / suggestions for improvement: IRO-002 R2 can be improved by replacing "prevent identified events" with "prevent anticipated events". "Anticipated" aligns better with contingency analysis than "identified"</p> <p>IRO-005-4 R1 and R2 can be improved by replacing "expected" with "anticipated". Contingencies are not necessarily "expected"; however, we do "anticipate" them.</p> <p>Response: The SDT believes the commenter intended to be commenting upon IRO-001-2 R2 rather than IRO-002-2 R2. The SDT has revised the requirements per your suggestion.</p>
<p>Response: Thank you for your comments. Please see responses above.</p>				
Anthony L Wilson	Georgia Power Company	3	Affirmative	Please see comments
<p>Response: The RCSDT thanks you for your comment. Please see response to posting comments for the SERC OC Standards Review Group; the RCSDT did not specifically find comments from Georgia Power Company and believes comments were included within this group.</p>				

Gordon Pietsch	Great River Energy	1	Negative	<p>Reliability Directive: It is our opinion the definition as currently written is too subjective and may cause a compliance auditor to question the grounds under which one of applicable entities declared the directive. We believe that revising the definition to state “to address a declared emergency...” will remove the subjectivity.</p> <p>Requirements for using three-part communication: It is our opinion that the standard needs language that clearly states that during a Blast Call three-part communication is not required. Blast Calls are used when information needs to be disseminated quickly to a large number of entities. Strictly enforcing the use of three-part communication under these circumstances has the potential to be more harmful to reliability than helpful.</p>
<p>Response: The RCSDT thanks you for your comment.</p> <p>Reliability Directive: The RCSDT believes the proposed standard requirement addresses your requested revision. “R1...shall identify the action as a Reliability Directive...” is addressing a declared emergency.</p> <p>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.</p> <p>As a reference, we have included the existing definition of Emergency:</p> <p>Emergency: Any abnormal system condition that requires automatic or immediate manual action to prevent or limit the failure of transmission facilities or generation supply that could adversely affect the reliability of the Bulk Electric System.</p> <p>The RCSDT agrees that the use of Blast Calls to issue Reliability Directives, in mass, is efficient and effective. The RCSDT believes Reliability Directives issued in mass should be defined by procedure, and that the procedure would establish a method of affirmation and notice of implementation. As envisioned, communications protocols would be addressed in the COM-003 standard being developed in Project 2007-02.</p>				
Shaun Jensen	Idaho Power Company	3	Negative	<p>It appears there is much concern with the wording, particularly in R2, as well as parties having issues with intermingled definitions. It is recommended to reword this, and ensure the VSL accurately reflects a direct definition that all entities all clear and certain on.</p>
<p>Response: The RCSDT thanks you for your comment. The RCSDT is not sure of which standard requirement is being referenced.</p>				
Bob C. Thomas	Illinois Municipal Electric Agency	4	Negative	<p>IMEA appreciates the SDT's efforts to date. We are basing our negative vote on ballot pool communications that have addressed points that need further refinement before the proposed revisions to these reliability standards are affirmed. IMEA supports, in particular, comments submitted by the Midwest ISO and the SERC OC</p>

				Standards Review Group.
<p>Response: The RCSDT thanks you for your comments. Please see responses to Midwest ISO and SERC OC Standards Review Group.</p>				
Kim Warren	Independent Electricity System Operator	2	Negative	<p>While we support the general direction of these standards development actions, we do have a number of concerns which cumulatively lead us to advocate a NEGATIVE vote. These include:</p> <p>(1) The phrase “within the same Interconnection” in COM-001-2 R1, limits the coordination activities to RCs, TOPs and BAs that can be detrimental to reliability. We recommend removing this phrase.</p> <p>Response: The RCSDT does not agree that the phrase “within the same interconnection” limits coordination between entities. The purpose of the phrase is to place a bound on which adjacent entity an RC must have Interpersonal Communication (e.g., an EI RC does not need communication with WI RCs). The phrase “within the same interconnection” is added for the case of ERCOT which has only DC tie lines with the Eastern Interconnection and has minimal interchange.</p> <p>(2) We believe the Interchange Coordinator and Purchasing-Selling Entity also need to have adequate communication capabilities with other entities but they are not included in the applicability section of COM-001-2.</p> <p>Response: We disagree that the IC and PSE need to be an applicable entity. To maintain reliability does not require communication with these entities. The applicability of COM-001, COM-002 and IRO-001 were revised to include the same reliability entities: RC, TOP, BA, DP and GOP. LSE, PSE and TSP were removed from the applicability of these standards per stakeholder suggestion.</p> <p>(3) The proposed definition of Reliability Directive addresses Emergency condition only. There are situations where a Reliability Directive is issued such that the directed action must be taken by the receiving entity to address a reliability constraint, which by itself does not constitute an Emergency. We suggest the term Reliability Directive be revised to: “A communication initiated by a Reliability Coordinator, Transmission Operator or Balancing Authority where action by the recipient is necessary to address a reliability constraint or an Emergency.”</p> <p>Response: The RCSDT believes that your comment concerns “directives” or “instructions” for normal operational activities rather than a Reliability Directive. There is no requirement preventing an entity from issuing either directives or</p>

				<p>instructions for the situations you mention. The intent of creating a Reliability Directive definition is to ensure that communications is tightened during Emergencies (per blackout report). When an RC issues a Reliability Directive, the RC has made a deliberate decision to formally end collaboration and require specific action(s). In addition, the Operating Personnel Communication Protocols SDT is addressing your concern about instances that are not considered an emergency. As envisioned, communications protocols requiring additional applications for use of three-part communications would be addressed in the COM-003 standard being developed in Project 2007-02.</p> <p>(4) Requirement R9 of COM-001-2 needs to be clarified. As written the requirement seems open ended once action to repair of a failed Alternative Interpersonal Communication is initiated within 2 hours but not completed within that time. It is not clear whether there is an expectation on the responsible entity to designate a replacement Alternative Interpersonal Communication if repairs cannot be completed within that period.</p> <p>Response: The requirement is saying that if the test fails you must initiate action for repair or designate a replacement alternative within two hours. There is no requirement for a tertiary capability nor is there a requirement for a repair deadline.</p> <p>We have also submitted additional comments in response to the request for comments.</p> <p>Response: Please see responses to other comments</p>
<p>Response: The RCSDT thanks you for your comment. Please see responses above.</p>				
Michael Moltane	International Transmission Company Holdings Corp	1	Negative	<p>ITC votes negative for the reasons detailed in the MISO-submitted comment form related to this Project (ITC signed onto the MISO comments). While this standard revision moves in the right direction, we believe at least one additional iteration will be needed to correct the concerns indicated in the comment form.</p>
<p>Response: The RCSDT thanks you for your comments. Please see responses to Midwest ISO.</p>				
Kathleen Goodman	ISO New England, Inc.	2	Negative	<p>Although ISO-NE believes these Standard represent a great improvement, we are voting against because we believe they would be improved by the comments that we have offered. We would gladly modify our vote in the Affirmative if our comments are considered in the next ballot.</p>

Response: The RCSDT thanks you for your comment. Please see response to those comments.				
Charles Locke	Kansas City Power & Light Co.	3	Negative	These requirements impose alternative means of communication on TOP's, BA's and GOP's regardless of the impact the entity may have on maintaining interconnection reliability. In addition, there are many IRO requirements that are proposed to be eliminated that do not appear to be considered in other places.
Response: The RCSDT thanks you for your comments. We cannot delineate entity impact on reliability and respond only regarding entity registration with NERC.				
Scott Heidtbrink	Kansas City Power & Light Co.	5	Negative	These requirements impose alternative means of communication on TOP's, BA's and GOP's regardless of the impact the entity may have on maintaining interconnection reliability. In addition, there are many IRO requirements that are proposed to be eliminated that do not appear to be considered in other places.
Response: The RCSDT thanks you for your comments. We cannot delineate entity impact on reliability and respond only regarding entity registration with NERC.				
Jessica L Klinghoffer	Kansas City Power & Light Co.	6	Negative	These requirements impose alternative means of communication on TOP's, BA's and GOP's regardless of the impact the entity may have on maintaining interconnection reliability. In addition, there are many IRO requirements that are proposed to be eliminated that do not appear to be considered in other places.
Response: The RCSDT thanks you for your comments. We cannot delineate entity impact on reliability and respond only regarding entity registration with NERC.				
Jim M Howard	Lakeland Electric	5	Negative	<p>From the last posting to this posting, for COM-002-3 R2, the phrase "the accuracy of the message has been confirmed" was added to the second step of three part communication. Why was this added? - "Accuracy" is not the correct term here. Suggest changing COM-002-3 R2 to read: Each Balancing Authority, Transmission Operator, Generator Operator, Transmission Service Provider, Load-Serving Entity, Distribution Provider, and Purchasing-Selling Entity that is the recipient of a Reliability Directive issued per Requirement R1, shall repeat, restate, rephrase or recapitulate the Reliability Directive with enough details to clearly communicate the recipient's understanding of the Reliability Directive.</p> <p>Response: The SDT, in drafting the proposed language, did indeed discuss using the word "understanding" rather than accuracy. However, the SDT was not able to</p>

				<p>identify a feasible measure for “understanding”. A recipient can judge whether the response is accurate when compared with the communications issued, but cannot judge the understanding of anyone, even though the responder may have accurately responded.</p> <p>The term "accuracy" can be interpreted as requiring the recipient to second-guess the Reliability Directive of the RC to ensure the accuracy of the RC's directive in the first place. Under tight time constraints of Emergencies, this is not practical. We are sure that was not the intent of the drafting team.</p> <p>Response: Several commenters expressed concern about the use of the word, ‘accuracy’ and the team revised the requirement to remove this word.</p>
<p>Response: The RCSDT thanks you for your comment.</p>				
Paul Shipps	Lakeland Electric	6	Negative	<p>The phrase "the accuracy of the message has been confirmed" was added to the second step of three part communication. "Accuracy" is not the correct term here. "Understanding" is a better term. The term "accuracy" is a term to be used in R3, the third part of the 3-part communication, so that the issuer of the directive ensures the accuracy of the recipients understanding.</p>
<p>Response: The RCSDT thanks you for your comment. The RCSDT has removed that phrase from the requirement as it was difficult to measure and many stakeholders had concerns with the language.</p>				
Rick Crinklaw	Lane Electric Cooperative, Inc.	3	Negative	<p>Thank you for the opportunity to comment and for your hard work on this project: While we agree that effective Interpersonal Communications capability are integral to reliability, many Distribution Providers (DP) are small entities that do not maintain a 24-7 dispatch desk capable of receiving or responding to emergency reliability directives in a timely manner. It is our belief that some of the proposals in this project could unnecessarily force small entities to make investments that will not enhance reliability. Many DPs rely on answering services to address customer-service issues during non-business hours. On-call personnel are contacted in the event of an outage or emergency and crews are dispatched as appropriate. It is difficult to envision a BA or TOP issuing an Emergency Reliability Directive to a small entity (25 MW or so) which would require these smaller entities to comply with COM-001. Order 693 directs the inclusions of DPs in the COM-001-2 standard but it is our belief that the Commission offered language that GOs and DPs need not have redundant communications, training unrelated to normal/emergency operations, and that telecommunications requirements for entities will vary according to their function. We believe those intentions should be reflected in the</p>

				<p>language of this standard. We would suggest adding wording such as in the applicability section, "Distribution Providers who maintain a 24-7 control centers with the ability to manually shed load of at least 100 MW within a 15-minute operational window." Also, a note that smaller, rural entities can be dependent on a phone system provider that will not allow for backup communications. Should the communication line(s) be dependent on one main phone trunk line, the failure due to an issue on this main line will make it impossible to notify anyone of its failure short of physically traveling to an area where phone service is available. For some rural areas, this will exceed the one hour time limit to report the communication outage. Forcing smaller entities to acquire satellite phone service to mitigate for a phone outage is a high price to pay when no reliability improvement will be achieved. Suggested change could be: "... shall notify impacted entities within 60 minutes of the detection of a failure of its Interpersonal Communications capabilities that lasts 30 minutes or longer where alternate forms of communication are available within a 15 minute access time. Should alternate forms of communication not be available within the 15 minute access time, then upon reestablishment of Communication capabilities impacted entities will be notified of the past loss and current status of Communication." We've heard many representatives from FERC and NERC indicate that the standards development process has led the industry to take action in many cases for the sake of compliance while not necessarily enhancing reliability. As has been stated many times, the process should be about improving reliability, not about complying with standards. Unnecessarily including smaller entities that will NEVER receive an emergency reliability directive might be an example of the former.</p>
<p>Response: The RCSDT thanks you for your comment. There is no requirement for 24/7 support. The requirement is to have communications capability. The type of system (e.g., On-Call) is not prescribed in the standard, and the standard is designed not to impose needless communications requirements. The purpose of COM-002 is, "to ensure emergency communications between operating personnel are <u>effective</u>." It's not a proxy requirement to establish 24/7 operating personnel at small distribution providers. The intent is to establish a <u>method</u> of communicating Reliability Directives during Emergencies. While it is true that many small Distribution Providers are not staffed 24x7, it is typical that they have a means of communication - in many cases this may be via a receptionist or answering service. 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. If this return call would not be timely enough, then the issuer would determine a different mitigation plan.</p>				
Michael Henry	Lincoln Electric Cooperative, Inc.	3	Negative	<p>Thank you for the opportunity to comment and for your hard work on this project: While we agree that effective Interpersonal Communications capability are integral to reliability, many Distribution Providers (DP) are small entities that do not maintain a 24-7 dispatch desk capable of receiving or responding to emergency reliability directives in a timely manner. It is our belief that some of the proposals in this project could unnecessarily force small entities to make investments that will not enhance reliability. Many DPs rely on answering services to address customer-</p>

				<p>service issues during non-business hours. On-call personnel are contacted in the event of an outage or emergency and crews are dispatched as appropriate. It is difficult to envision a BA or TOP issuing an Emergency Reliability Directive to a small entity (25 MW or so) which would require these smaller entities to comply with COM-001. Order 693 directs the inclusions of DPs in the COM-001-2 standard but it is our belief that the Commission offered language that GOs and DPs need not have redundant communications, training unrelated to normal/emergency operations, and that telecommunications requirements for entities will vary according to their function. We believe those intentions should be reflected in the language of this standard. We would suggest adding wording such as in the applicability section, "Distribution Providers who maintain a 24-7 control centers with the ability to manually shed load of at least 100 MW within a 15-minute operational window." Also, a note that smaller, rural entities can be dependent on a phone system provider that will not allow for backup communications. Should the communication line(s) be dependent on one main phone trunk line, the failure due to an issue on this main line will make it impossible to notify anyone of its failure short of physically traveling to an area where phone service is available. For some rural areas, this will exceed the one hour time limit to report the communication outage. Forcing smaller entities to acquire satellite phone service to mitigate for a phone outage is a high price to pay when no reliability improvement will be achieved. Suggested change could be: "... shall notify impacted entities within 60 minutes of the detection of a failure of its Interpersonal Communications capabilities that lasts 30 minutes or longer where alternate forms of communication are available within a 15 minute access time. Should alternate forms of communication not be available within the 15 minute access time, then upon reestablishment of Communication capabilities impacted entities will be notified of the past loss and current status of Communication." We've heard many representatives from FERC and NERC indicate that the standards development process has led the industry to take action in many cases for the sake of compliance while not necessarily enhancing reliability. As has been stated many times, the process should be about improving reliability, not about complying with standards. Unnecessarily including smaller entities that will NEVER receive an emergency reliability directive might be an example of the former.</p>
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Response: The RCSDT thanks you for your comment. There is no requirement for 24/7 support. The requirement is to have communications capability. The type of system (e.g., On-Call) is not prescribed in the standard, and the standard is designed not to impose needless communications requirements. The purpose of COM-002 is, "to ensure emergency communications between operating personnel are effective." It's not a proxy requirement to establish 24/7 operating personnel at small distribution providers. The intent is to establish a method of communicating Reliability Directives during Emergencies. While it is true that many small Distribution Providers are not staffed 24x7, it is typical that they have a means of communication - in many cases this may be via a receptionist or answering service. 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. If this

return call would not be timely enough, then the issuer would determine a different mitigation plan.

Bruce Merrill	Lincoln Electric System	3	Negative	For NERC Reliability Standard COM-001-2, LES believes that interpersonal communication is the act of communicating and that the requirements specify normal and redundant facilities for Interpersonal Communication. As such, LES recommends the definition for “Interpersonal Communication” be changed to “Any act where two or more individuals communicate, interact, consult or exchange information, including listening or reading”. Additionally, for NERC Reliability Standard IRO-001-2, LES recommends replacing the word “certify” in R1 and M1 with “assign”. As currently written it is unclear what the certification of the Reliability Coordinator will entail and how it will be established by the ERO.
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Response: The RCS DT thanks you for your comment. We specifically included “medium” to distinguish a source or vehicle of communication instead of a “personal” reference.

NERC has an established certification procedure for all registered entities and “certify” is in line with NERC’s process.

Dennis Florum	Lincoln Electric System	5	Negative	For NERC Reliability Standard COM-001-2, LES believes that interpersonal communication is the act of communicating and that the requirements specify normal and redundant facilities for Interpersonal Communication. As such, LES recommends the definition for “Interpersonal Communication” be changed to “Any act where two or more individuals communicate, interact, consult or exchange information, including listening or reading”. Additionally, for NERC Reliability Standard IRO-001-2, LES recommends replacing the word “certify” in R1 and M1 with “assign”. As currently written it is unclear what the certification of the Reliability Coordinator will entail and how it will be established by the ERO.
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Response: The RCS DT thanks you for your comment. We specifically included “medium” to distinguish a source or vehicle of communication instead of a “personal” reference.

NERC has an established certification procedure for all registered entities and “certify” is in line with NERC’s process.

Richard Reynolds	Lost River Electric Cooperative	3	Negative	Thank you for the opportunity to comment and for your hard work on this project: While we agree that effective Interpersonal Communications capability are integral to reliability, many Distribution Providers (DP) are small entities that do not maintain a 24-7 dispatch desk capable of receiving or responding to emergency reliability directives in a timely manner. It is our belief that some of the proposals in this project could unnecessarily force small entities to make investments that will not enhance reliability. Many DPs rely on answering services to address customer-service issues during non-business hours. On-call personnel are contacted in the
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				<p>event of an outage or emergency and crews are dispatched as appropriate. It is difficult to envision a BA or TOP issuing an Emergency Reliability Directive to a small entity (25 MW or so) which would require these smaller entities to comply with COM-001. Order 693 directs the inclusions of DPs in the COM-001-2 standard but it is our belief that the Commission offered language that GOs and DPs need not have redundant communications, training unrelated to normal/emergency operations, and that telecommunications requirements for entities will vary according to their function. We believe those intentions should be reflected in the language of this standard. We would suggest adding wording such as in the applicability section, "Distribution Providers who maintain a 24-7 control centers with the ability to manually shed load of at least 100 MW within a 15-minute operational window." Also, a note that smaller, rural entities can be dependent on a phone system provider that will not allow for backup communications. Should the communication line(s) be dependent on one main phone trunk line, the failure due to an issue on this main line will make it impossible to notify anyone of its failure short of physically traveling to an area where phone service is available. For some rural areas, this will exceed the one hour time limit to report the communication outage. Forcing smaller entities to acquire satellite phone service to mitigate for a phone outage is a high price to pay when no reliability improvement will be achieved. Suggested change could be: "... shall notify impacted entities within 60 minutes of the detection of a failure of its Interpersonal Communications capabilities that lasts 30 minutes or longer where alternate forms of communication are available within a 15 minute access time. Should alternate forms of communication not be available within the 15 minute access time, then upon reestablishment of Communication capabilities impacted entities will be notified of the past loss and current status of Communication." We've heard many representatives from FERC and NERC indicate that the standards development process has led the industry to take action in many cases for the sake of compliance while not necessarily enhancing reliability. As has been stated many times, the process should be about improving reliability, not about complying with standards. Unnecessarily including smaller entities that will NEVER receive an emergency reliability directive might be an example of the former.</p>
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Response: The RCSDT thanks you for your comment. There is no requirement for 24/7 support. The requirement is to have communications capability. The type of system (e.g., On-Call) is not prescribed in the standard, and the standard is designed not to impose needless communications requirements. The purpose of COM-002 is, "to ensure emergency communications between operating personnel are effective." It's not a proxy requirement to establish 24/7 operating personnel at small distribution providers. The intent is to establish a method of communicating Reliability Directives during Emergencies. While it is true that many small Distribution Providers are not staffed 24x7, it is typical that they have a means of communication - in many cases this may be via a receptionist or answering service. 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. If this return call would not be timely enough, then the issuer would determine a different mitigation plan.

Charles A. Freibert	Louisville Gas and Electric Co.	3	Negative	Refer to the comment form.
<p>Response: The RCSDT thanks you for your comment. Please see response to posting comments for LGE/KE; the RCSDT did not specifically find comments from Louisville Gas and Electric Co.</p>				
Joseph G. DePoorter	Madison Gas and Electric Co.	4	Negative	MGE is voting negative for several reasons. Please see the MRO NSRS comments for a full description. Plus, whenever there are multiple Standards within a Project, registered entities will be forced to vote negative when there is at least one negative aspect.
<p>Response: The RCSDT thanks you for your comment. Please see response to MRO NSRS comments. The NERC SC approved the SAR and the RCSDT only drafts requirements within the scope of the SAR. The RCSDT will move to a successive ballot with each standard balloted separately.</p>				
Joe D Petaski	Manitoba Hydro	1	Negative	The current data retention requirement of 90 days is more than adequate. Increasing this period to 12 months would result in a significant amount of work with no benefit to reliability. For additional comments, please see Manitoba Hydro's comments provided during formal comment period.
<p>Response: The RCSDT thanks you for your comment. However, the comment submitted is incomplete and does not reference specific standard(s) or requirement(s). The data retention periods for the set of standards proposed is consistent with the guidelines provided in the NERC Drafting team Guidelines. Note that with recent changes to the Rules of Procedure, entities must be prepared to demonstrate that they were compliant for the full time period since the last audit.</p>				
Greg C. Parent	Manitoba Hydro	3	Negative	The current data retention requirement of 90 days is more than adequate. Increasing this period to 12 months would result in a significant amount of work with no benefit to reliability. For additional comments, please see Manitoba Hydro's comments provided during formal comment period.
<p>Response: The RCSDT thanks you for your comment. However, the comment submitted is incomplete and does not reference specific standard(s) or requirement(s). The data retention periods for the set of standards proposed is consistent with the guidelines provided in the NERC Drafting team Guidelines. Note that with recent changes to the Rules of Procedure, entities must be prepared to demonstrate that they were compliant for the full time period since the last audit.</p>				
S N Fernando	Manitoba Hydro	5	Negative	The current data retention requirement of 90 days is more than adequate. Increasing this period to 12 months would result in a significant amount of work with no benefit to reliability. For additional comments, please see Manitoba Hydro's

				comments provided during formal comment period.
<p>Response: The RCSDT thanks you for your comment. However, the comment submitted is incomplete and does not reference specific standard(s) or requirement(s). The data retention periods for the set of standards proposed is consistent with the guidelines provided in the NERC Drafting team Guidelines. Note that with recent changes to the Rules of Procedure, entities must be prepared to demonstrate that they were compliant for the full time period since the last audit.</p>				
Daniel Prowse	Manitoba Hydro	6	Negative	The current data retention requirement of 90 days is more than adequate. Increasing this period to 12 months would result in a significant amount of work with no benefit to reliability. For additional comments, please see Manitoba Hydro's comments provided during formal comment period.
<p>Response: The RCSDT thanks you for your comment. However, the comment submitted is incomplete and does not reference specific standard(s) or requirement(s). The data retention periods for the set of standards proposed is consistent with the guidelines provided in the NERC Drafting team Guidelines. Note that with recent changes to the Rules of Procedure, entities must be prepared to demonstrate that they were compliant for the full time period since the last audit.</p>				
Jason L Marshall	Midwest ISO, Inc.	2	Negative	<p>We thank the drafting team for their efforts on this project to improve the reliability coordination standards. The quality of the standards continues to improve over previous postings. While the drafting team is definitely moving the standards in the right direction, we believe we have not reached the point of diminishing returns and that there are several issues that the drafting team still needs to address.</p> <p>1 This standard does not comport with the informational filing that NERC submitted to FERC on August 10, 2009 regarding its discontinued use of sub-requirements in standards development activities.</p> <p>Response: The sub-requirements are an old format. The standard was updated to the new template, and sub-requirements are now Parts.</p> <p>2 In general, we are not opposed to the concept of the ERO certifying the Reliability Coordinators; however, there are some issues with how the requirement IRO-001-2 R1 is written. The requirement places emphasis on regions and regional boundaries when no emphasis should be placed there. There are multiple Reliability Coordinators that span multiple regions. The language “to continuously assess transmission reliability” should be changed to “to continuously assess Bulk Electric System reliability” to reflect on what the standards are enforceable. The requirement on the ERO should also be expanded similar to BAL-005-0.1b R1 to ensure that all operating entities and the entire BES are covered under a Reliability Coordinator Area.</p>

				<p>Response: Many commenters suggested removing the requirement because it is addressed in the NERC Rules of Procedure. The RCSDT concurs and has removed R1 from IRO-001-2.</p> <p>3 The SDT did not address all of our concerns with COM-002-3 from the last posting. For entities registered as multiple functions, the combination of the definition of Reliability Directive and Requirement R1 could be confused to require a company to issue directives to itself. There are several organizations registered as a Reliability Coordinator, Transmission Operator and Balancing Authority. In these companies, it is not uncommon for those responsibilities to be distributed across multiple desks. Thus, for certain situations, a single System Operator may actually be the Reliability Coordinator and the Transmission Operator. In other situations, the System Operator serving the Reliability Coordinator function may be adjacent to the System Operator serving the as the Transmission Operator or Balancing Authority. We believe that it should never be necessary for these System Operators to issue Reliability Directives to themselves in the first example or to their co-worker in the second example to demonstrate compliance to NERC standards. How the entity coordinates its actions among its Reliability Coordinator, Balancing Authority and Transmission Operator roles is a corporate governance issue that should not be confused or complicated by the NERC standards. Thus, we believe that standards should be made clear that the Reliability Directive is directed to another company.</p> <p>Response: COM-002 does not preclude text or other forms of communication for issuing Reliability Directives. However, entities still must comply with the requirements of COM-002. Further, the RCSDT believes it to be equally imperative that each NERC registered function hold the authority to issue Reliability Directives, and the ability to receive Reliability Directives, whether those Reliability Directives are issued to subordinate registered functions within a vertically integrated utility, or to registered entities that are corporately separate. The RCSDT believes the following response to draft 3 comments still holds true:</p> <p>“The way that COM-002 is crafted, it focuses on functional entity communication between and among functions. Face-to-face communication of Reliability Directives are subject to the requirements of COM-002 and can be measured for COM-002 by allowing Operator Logs as possible evidence to support compliance”.</p> <p>The use of operator logs to memorialize and provide evidence of compliance is applicable to those Reliability Directives issued and received within the same control room or operations center. The RCSDT believes that any Registered Entity or person operating as such must understand the intent of the issued Reliability Directive, and that the issuer of the Reliability Directive believe that the Reliability</p>
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			<p>Directive was correctly received.</p> <p>4 We also are concerned about the need to conduct three-part communications for a Reliability Directive issued through a blast call. Under these circumstances, the need for immediate action of multiple parties may require a blast call and there may not be time for all parties to complete three-part communications before initiating actions. Thus, we believe blast calls should be treated separately and that should be made clear.</p> <p>Response: The RCSDT agrees that the use of Blast Calls to issue Reliability Directives, in mass, is efficient and effective. However the essence of accurately implementing Reliability Directives is accomplished by use of 3-part communications. The RCSDT believes Reliability Directives issued in mass should be defined by procedure, and that the procedure would establish a method of affirmation and notice of implementation. As envisioned, communications protocols requiring for issuing alerts will be addressed in the COM-003 standard being developed in Project 2007-02.</p> <p>5 COM-002-3 R2 needs to be rewritten as it is too verbose. The point is for the recipient of the original message to get the issuer to confirm that the message was understood. We suggest rewording R2 to “Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, Transmission Service Provider, Load-Serving Entity, Distribution Provider, and Purchasing-Selling Entity that is the recipient of a Reliability Directive issued per Requirement R1, shall repeat, restate, rephrase or recapitulate the Reliability Directive.” Once the receiver has completed this requirement, the ball is in the issuer’s court per Requirement R3. No additional words are necessary in the requirement.</p> <p>Response: The RCSDT agrees and has revised the requirement as you suggest.</p> <p>6 Please strike part IRO-014-2 Part 1.7. There is no need to have a weekly conference to discuss every Operating Procedure, Operating Process and Operating Plan. As this requirement is written, a conference call would be necessary for each. Furthermore, IRO-014-2 R4 already includes a requirement to have weekly conference calls that should suffice. IRO-014-2 R2 seems to recognize that these Operating Procedures, Processes and Plans likely will not need to be discussed weekly as it only requires an annual update.</p> <p>Response: The intent of R1 is for Reliability Coordinators to coordinate specific activities with other impacted Reliability Coordinators. These activities are listed as Parts. Further the RCSDT believes that it is prudent that Reliability Coordinators talk at least once a week to verify viability of mutual plans, procedures or processes. The relation of IRO-14-2 PART 1.7 to R4 is that PART 1.7 requires</p>
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			<p>having a conference call, R4 requires participation by all impacted Reliability Coordinators. As such, neither replaces the other.</p> <p>7 IRO-014-2 R4 is overly broad and would require Reliability Coordinators that will not impact one another to participate on conference calls with one another without any reliability benefit. The issue is created by the addition of the clause “within the same Interconnection” to the requirement. ISO-NE, FRCC, Midwest ISO, and SPP are all in the same Interconnection. It is hard to fathom there being reliability benefit to SPP and ISO-NE conversing weekly or Midwest ISO and FRCC conversing weekly. We suggest limiting the requirement to adjacent Reliability Coordinators.</p> <p>Response: IRO-14-2 R4 is applicable to those Reliability Coordinators engaged in activities related to R1 and subsequently PART 1.7. It is unlikely that Reliability Coordinators whom are geographically and electrically distant will have mutually agreed upon operating procedures; therefore requirement R4 would not apply.</p> <p>8 For IRO-014-2 R5, we suggest replacing “other” with “impacted” to limit the notification of Adverse Reliability Impacts to only those Reliability Coordinators that need to know. Because the definition of Adverse Reliability Impact includes “Bulk Electric System instability or Cascading”, it is possible that the cascading of 138 kV lines serving a load pocket or generator outlet stability issues could require a Reliability Coordinator to notify all other Reliability Coordinators regardless of impact. This would include Reliability Coordinators outside of the Interconnection with the problem. It would also include Reliability Coordinators that are not impacted. For instance, an issue in New England that would not pose a threat outside the northeast would require ISO-NE to notify SPP and FRCC and Reliability Coordinators in the Western Interconnection. There is no reliability benefit to this notification.</p> <p>Response: This requirement continues the current practice of informing all RCs of ARIs. Due to the nature of an ARI, this requirement is typically implemented as an RCIS message or a hotline call to all RC’s. This is intended to make all RCs aware of ARIs and support situational awareness.</p> <p>9 IRO-014-2 R6-R8 are problematic and need to be refined to make clear that the Reliability Coordinators shall operate to the most conservative limit. It should not require a Reliability Coordinator that disagrees with an action plan to implement the action plan. The Reliability Coordinator will be disagreeing with the action plan for reliability reasons. Assuming they are correct, the requirement to implement said action plan will actually put the Interconnection at greater risk. These requirements inappropriately attempt to codify the debate and analysis that occurs between and within Reliability Coordinators when there are differing results in reliability analysis. This is part of the problem with having a Wide Area view that results in Reliability Coordinators having a view into other Reliability Coordinator Areas. Their results</p>
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			<p>and conclusions may be different. There should be a hierarchical structure for whose results should be used. It should be the Reliability Coordinator with primary responsibility unless the other Reliability Coordinator has evidence to demonstrate that the Reliability Coordinator with primary responsibility is incorrect. What this should do is to trigger both to review their models and data to assess the problem. None of this needs to be codified in the standards though.</p> <p>Response: Requirements R6-R8 are translated from IRO-016-1, Requirement R1. If an RC sees a problem and another does not see the same problem, then there may be an issue with someone's model or processes or procedures. The RC's are supposed to have coordinated Operating Plans, Processes or Procedures to operate reliably. R6-R8 are only applicable if one of the two (or more) RCs do not see that a problem exists. It would be a detriment to reliability for both RCs to take no action. RCs are required to coordinate actions under existing IRO-016-1, R1. If one RC identifies a problem and provides an action plan to another RC to mitigate the problem, the second RC is obligated under R8 to implement it. We have revised the R8 to clarify this intent.</p> <p>IRO-014-2, Revised R8. During those instances where Reliability Coordinators disagree on the existence of an Adverse Reliability Impact, each Reliability Coordinator shall implement the action plan developed by the Reliability Coordinator that identified the Adverse Reliability Impact unless such actions would violate safety, equipment, regulatory or statutory requirements.</p> <p>10 In the definition of Reliability Directive, we suggest changing "to address an Emergency" to "to address a declared Emergency". This would help limit second guessing for a situation where a System Operator took action because he truly believed he was in an Emergency but after the fact analysis demonstrates there really was not an Emergency.</p> <p>Response: The RCSDT believes that modifying Reliability Directive by including "declared Emergency" would add an unnecessary step in mitigation of the Emergency.</p> <p>11 We disagree with deleting IRO-002-1 R5 and R7 which establish tools and monitoring capabilities. There should be basic tools requirements established for Reliability Coordinators. Project 2009-02 Real-time Reliability Monitoring and Analysis Capabilities will be addressing these issues in more detail. Thus, it does not make sense to delete these requirements until that dra</p> <p>Response: Each RC has been certified to continue operations as an RC or been certified prior to beginning operations as an RC. The minimum set of tools and capabilities for an RC are "checked off" during the certification process. The</p>
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				reliability objective of R5 and R7 is to perform analyses to ensure reliability of the BES by specifying capability rather than mandating specific tools. The analysis provisions of R5 and R7 are covered under IRO-008-1, Requirements R1 (perform Operational Planning Analysis) and R2 (perform Real-time Analysis). It is anticipated that Project 2009-02 team will address this issue more fully.
Response: The RCSDT thanks you for your comments.				
Richard Burt	Minnkota Power Coop. Inc.	1	Negative	Minnkota is in agreement with the comments submitted by the MRO NSRS.
Response: The RCSDT thanks you for your comment. Please see MRO NSRS response to comments.				
Don Horsley	Mississippi Power	3	Affirmative	Please see comments
Response: The RCSDT thanks you for your comment. Please see response to those comments.				
John S Bos	Muscatine Power & Water	3	Negative	<p>1 In the COM-001 requirements, MP&W does not agree that a Distribution Provider and a Generator Operator need to be held to the same level of responsibility as a Reliability Coordinator, Balancing Authority, or Transmission Operator. In FERC Order 693 (paragraph 487), FERC directed the Distribution Provider and Generator Operator to be incorporated in this standard by stating:” We expect the telecommunication requirements for all applicable entities will vary according to their roles and that these requirements will be developed under the Reliability Standards development process.” A Distribution Provider and Generator Operator may not be staffed 24 hours a day like a Balancing Authority or Transmission Operator; nevertheless, the Standards Drafting Team did not consider this.</p> <p>Response: There is no requirement that requires identical communications systems. The requirement is to have “a” communication capability. Regarding 24/7 support, the requirement is to have communications capability. The type of media used is not specified. For a small DP, an on-call system could suffice. The RCSDT also recognizes the FERC directive and has not included GOPs and DPs in the requirements for Alternative Interpersonal Communications capability.</p> <p>2 MP&W does not agree with the revision of IRO-001 with the statement included</p>

				<p>for certifying Reliability Coordinators. As written, it is ambiguous as far as what level of certification this would involve.</p> <p>Response: Many commenters suggested removing the requirement because it is addressed in the NERC Rules of Procedure. The RCSDT concurs and has removed R1 from IRO-001-2.</p> <p>3 MP&W disagrees with COM-002-3 R2. As stated in FERC Order 693 (paragraph 512) it is essential that Reliability Coordinators, Balancing Authorities, and Transmission Operators have communications with Distribution Providers. Requirement 2 also applies to Transmission Service Providers, Load-Serving Entities and Purchasing and Selling Entities. As stated above, it is going to be unattainable to communicate with a Distribution Provider since most Distribution Providers are usually not operated 24 hours per day like Reliability Coordinators, Balancing Authorities, and Transmission Operators. Many Distribution Providers have answering services that will relay a message once they receive it and then pass it along to someone. An answering service could repeat the directive back, word for word, but this would not add any level of reliability. The Standards Drafting Team should reconsider the applicability section of this Standard to apply to only Reliability Coordinators, Balancing Authorities, and Transmission Operators for the issuance of a Reliability Directive.</p> <p>Response: There is no requirement for 24/7 support. The requirement is to have communications capability. The type of system (e.g., On-Call) is not prescribed in the standard, and the standard is designed not to impose needless communications requirements. The purpose of COM-002 is, "to ensure emergency communications between operating personnel are <u>effective</u>." It's not a proxy requirement to establish 24/7 operating personnel at small distribution providers. The intent is to establish a <u>method</u> of communicating Reliability Directives during Emergencies. While it is true that many small Distribution Providers are not staffed 24x7, it is typical that they have a means of communication - in many cases this may be via a receptionist or answering service. 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. If this return call would not be timely enough, then the issuer would determine a different mitigation plan.</p>
<p>Response: The RCSDT thanks you for your comments. Please see responses above.</p>				
Mike Avesing	Muscatine Power & Water	5	Negative	In the COM-001 requirements, MP&W does not agree that a Distribution Provider and a Generator Operator need to be held to the same level of responsibility as a Reliability Coordinator, Balancing Authority, or Transmission Operator. In FERC

			<p>Order 693 (paragraph 487), FERC directed the Distribution Provider and Generator Operator to be incorporated in this standard by stating:” We expect the telecommunication requirements for all applicable entities will vary according to their roles and that these requirements will be developed under the Reliability Standards development process.” A Distribution Provider and Generator Operator may not be staffed 24 hours a day like a Balancing Authority or Transmission Operator; nevertheless, the Standards Drafting Team did not consider this.</p> <p>Response: There is no requirement that requires identical communications systems. The requirement is to have “a” communication capability. Regarding 24/7 support, the requirement is to have communications capability. The type of media used is not specified. For a small DP, an on-call system could suffice. The RCSDT also recognizes the FERC directive and has not included GOPs and DP in the requirements for Alternative Interpersonal Communications capability.</p> <p>MP&W does not agree with the revision of IRO-001 with the statement included for certifying Reliability Coordinators. As written, it is ambiguous as far as what level of certification this would involve.</p> <p>Response: Many commenters suggested removing the requirement because it is addressed in the NERC Rules of Procedure. The RCSDT concurs and has removed R1 from IRO-001-2.</p> <p>MP&W disagrees with COM-002-3 R2. As stated in FERC Order 693 (paragraph 512) it is essential that Reliability Coordinators, Balancing Authorities, and Transmission Operators have communications with Distribution Providers. Requirement 2 also applies to Transmission Service Providers, Load-Serving Entities and Purchasing and Selling Entities. As stated above, it is going to be unattainable to communicate with a Distribution Provider since most Distribution Providers are usually not operated 24 hours per day like Reliability Coordinators, Balancing Authorities, and Transmission Operators. Many Distribution Providers have answering services that will relay a message once they receive it and then pass it along to someone. An answering service could repeat the directive back, word for word, but this would not add any level of reliability. The Standards Drafting Team should reconsider the applicability section of this Standard to apply to only Reliability Coordinators, Balancing Authorities, and Transmission Operators for the issuance of a Reliability Directive.</p> <p>Response: The RCSDT thanks you for your comment. There is no requirement for 24/7 support. The requirement is to have communications capability. The type of system (e.g., On-Call) is not prescribed in the standard, and the standard is</p>
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<p>Response: The RCSDT thanks you for your comment.</p>				
Brandy D Olson	Muscatine Power & Water	6	Negative	<p>In the COM-001 requirements, MP&W does not agree that a Distribution Provider and a Generator Operator need to be held to the same level of responsibility as a Reliability Coordinator, Balancing Authority, or Transmission Operator. In FERC Order 693 (paragraph 487), FERC directed the Distribution Provider and Generator Operator to be incorporated in this standard by stating:” We expect the telecommunication requirements for all applicable entities will vary according to their roles and that these requirements will be developed under the Reliability Standards development process.” A Distribution Provider and Generator Operator may not be staffed 24 hours a day like a Balancing Authority or Transmission Operator; nevertheless, the Standards Drafting Team did not consider this.</p> <p>Response: There is no requirement that requires identical communications systems. The requirement is to have “a” communication capability. Regarding 24/7 support, the requirement is to have communications capability. The type of media used is not specified. For a DP an on-call system could suffice. The RCSDT also recognizes the FERC directive and has not included GOPs and DP in the requirements for Alternative Interpersonal Communications capability.</p> <p>MP&W does not agree with the revision of IRO-001 with the statement included for certifying Reliability Coordinators. As written, it is ambiguous as far as what level of certification this would involve.</p> <p>Response: Many commenters suggested removing the requirement because it is addressed in the NERC Rules of Procedure. The RCSDT concurs and has removed R1 from IRO-001-2.</p>

				<p>MP&W disagrees with COM-002-3 R2. As stated in FERC Order 693 (paragraph 512) it is essential that Reliability Coordinators, Balancing Authorities, and Transmission Operators have communications with Distribution Providers. Requirement 2 also applies to Transmission Service Providers, Load-Serving Entities and Purchasing and Selling Entities. As stated above, it is going to be unattainable to communicate with a Distribution Provider since most Distribution Providers are usually not operated 24 hours per day like Reliability Coordinators, Balancing Authorities, and Transmission Operators. Many Distribution Providers have answering services that will relay a message once they receive it and then pass it along to someone. An answering service could repeat the directive back, word for word, but this would not add any level of reliability. The Standards Drafting Team should reconsider the applicability section of this Standard to apply to only Reliability Coordinators, Balancing Authorities, and Transmission Operators for the issuance of a Reliability Directive.</p> <p>Response: The RCSDT thanks you for your comment. There is no requirement for 24/7 support. The requirement is to have communications capability. The type of system (e.g., On-Call) is not prescribed in the standard, and the standard is designed not to impose needless communications requirements. The purpose of COM-002 is, "to ensure emergency communications between operating personnel are <u>effective</u>." It's not a proxy requirement to establish 24/7 operating personnel at small distribution providers. The intent is to establish a <u>method</u> of communicating Reliability Directives during Emergencies. While it is true that many small Distribution Providers are not staffed 24x7, it is typical that they have a means of communication - in many cases this may be via a receptionist or answering service. 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. If this return call would not be timely enough, then the issuer would determine a different mitigation plan.</p>
<p>Response: The RCSDT thanks you for your comment.</p>				
Tony Eddleman	Nebraska Public Power District	3	Negative	<p>COM-001-2:</p> <p>A) We would need clarification as to what the process would be for Interpersonal communication and alternate Interpersonal communications and voice recording if the (1) TO and the BA are the same person, (2) if the TO and the BA are sitting across the desk from each other, or (3) if the TO, BA, and Distribution provider are all in the same company or same room.</p> <p>B) In the definition of Interpersonal Communications if data is included (?), what</p>

			<p>evidence of compliance is expected?</p> <p>C) R 1.2 and R2.2 Reliability Coordinators communication shouldn't be limited to the same interconnection. They need communications concerned with schedules across DC ties.</p> <p>D) For R3, neighboring Transmission Operators should be included.</p> <p>E) For R5, neighboring Balancing Authorities should be included.</p> <p>Response: A) The IC and AIC requirements apply to the functional entity. If a company has all of the functions performed in the same room, they would verbally communicate with each other in person (with sound waves being the medium).</p> <p>B) Data is not included in the definition of Interpersonal Communications but is covered in approved IRO-010-1 and proposed TOP-003-2.</p> <p>C) BAs handle Interchange Schedules. The RC has Interpersonal Communications with its BAs. DC ties usually have contractually designated operators who handle operating concerns.</p> <p>D) The SDT agrees, and has revised the requirement to include 'adjacent' TOPs synchronously connected within the same Interconnection.</p> <p>E) The SDT agrees and has revised the requirement to include 'adjacent' BAs</p> <p>COM-002-3 (R1):</p> <p>A) Since an entity can be registered for multiple functions (functions noted in R1), this could lead to the requirement for entities to issue directives to themselves or co-workers in the same room.</p> <p>B) How would a 3-part communication work when a "blast" call is used to provide directives to several entities?</p> <p>Response: A) COM-002 does not preclude text or other forms of communication for issuing Reliability Directives. However, entities still must comply with the requirements of COM-002. Further, the RCSDT believes it to be equally imperative that each NERC registered function hold the authority to issue Reliability Directives, and the ability to receive Reliability Directives, whether those Reliability Directives are issued to subordinate registered functions within a vertically integrated utility, or to registered entities that are corporately separate.</p>
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				<p>The RCSDT believes the following response to draft 3 comments still holds true:</p> <p>“The way that COM-002 is crafted, it focuses on functional entity communication between and among functions. Face-to-face communication of Reliability Directives are subject to the requirements of COM-002 and can be measured for COM-002 by allowing Operator Logs as possible evidence to support compliance”.</p> <p>COM-002 should not be construed to mean that an individual serving in two functions be required to issue a Reliability Directive to himself, but rather it is expected that such an individual would appropriately address the reliability issues as required by the function they are serving and its subsequent responsibilities.</p> <p>B) The RCSDT agrees that the use of Blast Call’s to issue Reliability Directives, in mass, is efficient and effective. However the essence of accurately implementing Reliability Directives is accomplished by use of 3-part communications. The RCSDT believes Reliability Directives issued in mass should be defined by procedure, and that the procedure would establish a method of affirmation and notice of implementation. As envisioned, communications protocols requiring for issuing alerts will be addressed in the COM-003 standard being developed in Project 2007-02.</p>
<p>Response: The RCSDT thanks you for your comment.</p>				
Don Schmit	Nebraska Public Power District	5	Negative	<p>COM-001-2:</p> <p>A) We would need clarification as to what the process would be for Interpersonal communication and alternate Interpersonal communications and voice recording if the TO and the BA are the same person, if the TO and the BA are sitting across the desk from each other, or if the TO, BA, and Distribution provider are all in the same company or same room.</p> <p>B) If the Interpersonal Communication definition includes data (?) then what evidence needs to provided?</p> <p>C) R1.2 and R2.2, Reliability Coordinators communication shouldn’t be limited to the same interconnection. They also need communications concerned with schedules across DC ties.</p> <p>D) For R3, neighboring Transmission Operators should be included.</p> <p>E)For R5, neighboring Balancing Authorities should be included.</p> <p>Response: A) The IC and AIC requirements apply to the functional entity. If a</p>

			<p>company has all of the functions performed by the same person or people in the same room, they would verbally communicate with each other in person. (sound waves – medium)</p> <p>B) Data is not included in the definition of Interpersonal Communications but is covered in approved IRO-010-1 and proposed TOP-003-2.</p> <p>C) BAs handle Interchange Schedules. The RC has Interpersonal Communications with its BAs. DC ties usually have contractually designated operators who handle operating concerns.</p> <p>D) The SDT agrees, and has revised the requirement to include ‘adjacent’ TOPs synchronously connected within the same Interconnection.</p> <p>E) The SDT agrees and has revised the requirement to include ‘adjacent’ BAs</p> <p>COM-002-3(R1):</p> <p>A) Concern regarding entities registered with multiple functions. Could lead to requirement for entities to give directives to themselves or to co-workers in the same room.</p> <p>B) How would 3-part communications be handled during 'blast' calls?</p> <p>Response: A) COM-002 does not preclude text or other forms of communication for issuing Reliability Directives. However, entities still must comply with the requirements of COM-002. Further, the RCSDT believes it to be equally imperative that each NERC registered function hold the authority to issue Reliability Directives, and the ability to receive Reliability Directives, whether those Reliability Directives are issued to subordinate registered functions within a vertically integrated utility, or to registered entities that are corporately separate. The RCSDT believes the following response to draft 3 comments still holds true:</p> <p style="padding-left: 40px;">“The way that COM-002 is crafted, it focuses on functional entity communication between and among functions. Face-to-face communication of Reliability Directives are subject to the requirements of COM-002 and can be measured for COM-002 by allowing Operator Logs as possible evidence to support compliance”.</p> <p>Com-002 should not be construed to mean that an individual serving in two functions be required to issue a Reliability Directive to himself, but rather it is expected that such an individual would appropriately address the reliability issues as required by the function they are serving and its subsequent responsibilities.</p> <p>B) The RCSDT agrees that the use of Blast Calls to issue Reliability Directives, in</p>
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				<p>mass, is efficient and effective. However the essence of accurately implementing Reliability Directives is accomplished by use of 3-part communications. The RCSDT believes Reliability Directives issued in mass should be defined by procedure, and that the procedure would establish a method of affirmation and notice of implementation. As envisioned, communications protocols requiring for issuing alerts will be addressed in the COM-003 standard being developed in Project 2007-02.</p>
<p>Response: The RCSDT thanks you for your comment.</p>				
Gregory Campoli	New York Independent System Operator	2	Abstain	<p>The NYISO agrees that these revised standards are an improvement from the current version. However we believe that the comments submitted by the IRC and NPCC are required to make them acceptable as the new set of standards. We will have an opportunity to revise our vote on the second ballot based on the consideration given to the comments submitted.</p>
<p>Response: The RCSDT thanks you for your comment. See IRC and NPCC comments.</p>				
Michael Schiavone	Niagara Mohawk (National Grid Company)	3	Affirmative	<p>IRO-001 R1 The language “to continuously assess transmission reliability” should be changed to “to continuously assess Bulk Electric System reliability” to reflect what the enforceability of the standards are meant to be.</p> <p>Response: Many commenters suggested removing the requirement because it is addressed in the NERC Rules of Procedure. The RCSDT concurs and has removed R1 from IRO-001-2.</p> <p>IRO-001 R2 Should “of” be “to”? Reliability Directives are issued to TOPs, BA, etc.</p> <p>Response: The requirement was rewritten for clarity as follows:</p> <p>R2. Each Reliability Coordinator shall take actions or direct actions (which could include issuing Reliability Directives) by Transmission Operators, Balancing Authorities, Generator Operators, and Distribution Providers within its Reliability Coordinator Area to prevent identified events or mitigate the magnitude or duration of actual events that result in Adverse Reliability Impacts.</p> <p>IRO-001 R2 Contains the words “which could include issuing Reliability Directives”, but Reliability Directives are not referenced anywhere else in the standard. This inclusion seems unnecessary since without it, R2 already requires that the RC take actions or direct actions by others to prevent identified events or mitigate the</p>

				<p>magnitude or duration of actual events that result in Adverse Reliability Impacts. Whether or not a Reliability Directive is issued is irrelevant in this requirement. These words should be removed. Note that COM-002 will stipulate the requirement for 3-part communication when a Reliability Directive is issued. The inclusion of “which could include issuing Reliability Directives” in IRO-001 is unnecessary.</p> <p>Response: R2 requires the Reliability Coordinator to act. These actions could include Reliability Directives in the case of an Emergency. However, issuing Reliability Directives might not always be necessary, as the Reliability Coordinator may be acting proactively well in advance of an emergency. R2 promotes this proactive approach, but reserves the use of Reliability Directives for circumstances that require its use. During the vetting of the prior version of this requirement, some stakeholders expressed concern that the word, “action,” if not clarified, could lead some people to believe that the Reliability Coordinator must be the entity to perform the actual operation.</p> <p>COM-002 In place of requiring an operator, in real-time, to state “this is a Reliability Directive,” there should be an allowance for an entity to develop procedures indicating, in advance, their expectations of three-part to their sub-operating entities. Modify R1 to be “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, either verbally, when the communication is issued, or in advance through documented procedures, as a Reliability Directive to the recipient. [Violation Risk Factor: High][Time Horizon: Real-Time.]”</p> <p>Response: Your proposed edit does not meet the reliability intent of the requirement. The RCSDT believes that it is important to state that the Reliability Directive is being issued to convey that action by the recipient is required. An RC could issue a Reliability Directive to implement an agreed upon procedure whereby the three part communication would not list each step of the procedure individually, but would include implementation of the entire procedure. As envisioned, communications protocols such as the procedure you’ve proposed will be addressed in the COM-003 standard being developed in Project 2007-02.</p>
<p>Response: The RCSDT thanks you for your comment. Please see responses above.</p>				
Jon Shelby	Northern Lights Inc.	3	Negative	<p>Thank you for the opportunity to comment and for your hard work on this project: While we agree that effective Interpersonal Communications capability are integral to reliability, many Distribution Providers (DP) are small entities that do not maintain a 24-7 dispatch desk capable of receiving or responding to emergency reliability</p>

				<p>directives in a timely manner. It is our belief that some of the proposals in this project could unnecessarily force small entities to make investments that will not enhance reliability. Many DPs rely on answering services to address customer-service issues during non-business hours. On-call personnel are contacted in the event of an outage or emergency and crews are dispatched as appropriate. It is difficult to envision a BA or TOP issuing an Emergency Reliability Directive to a small entity (25 MW or so) which would require these smaller entities to comply with COM-001. Order 693 directs the inclusions of DPs in the COM-001-2 standard but it is our belief that the Commission offered language that GOs and DPs need not have redundant communications, training unrelated to normal/emergency operations, and that telecommunications requirements for entities will vary according to their function. We believe those intentions should be reflected in the language of this standard. We would suggest adding wording such as in the applicability section, "Distribution Providers who maintain a 24-7 control centers with the ability to manually shed load of at least 100 MW within a 15-minute operational window." Also, a note that smaller, rural entities can be dependent on a phone system provider that will not allow for backup communications. Should the communication line(s) be dependent on one main phone trunk line, the failure due to an issue on this main line will make it impossible to notify anyone of its failure short of physically traveling to an area where phone service is available. For some rural areas, this will exceed the one hour time limit to report the communication outage. Forcing smaller entities to acquire satellite phone service to mitigate for a phone outage is a high price to pay when no reliability improvement will be achieved. Suggested change could be: "... shall notify impacted entities within 60 minutes of the detection of a failure of its Interpersonal Communications capabilities that lasts 30 minutes or longer where alternate forms of communication are available within a 15 minute access time. Should alternate forms of communication not be available within the 15 minute access time, then upon reestablishment of Communication capabilities impacted entities will be notified of the past loss and current status of Communication." We've heard many representatives from FERC and NERC indicate that the standards development process has led the industry to take action in many cases for the sake of compliance while not necessarily enhancing reliability. As has been stated many times, the process should be about improving reliability, not about complying with standards. Unnecessarily including smaller entities that will NEVER receive an emergency reliability directive might be an example of the former.</p>
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Response: The RCSDT thanks you for your comment. There is no requirement for 24/7 support. The requirement is to have communications capability. The type of system (e.g., On-Call) is not prescribed in the standard, and the standard is designed not to impose needless communications requirements. The purpose of COM-002 is, "to ensure emergency communications between operating personnel are effective." It's not a proxy requirement to establish 24/7 operating personnel at small distribution providers. The intent is to establish a method of communicating Reliability Directives during Emergencies. While it is true that many small Distribution Providers are not staffed 24x7, it is typical

that they have a means of communication - in many cases this may be via a receptionist or answering service. 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. If this return call would not be timely enough, then the issuer would determine a different mitigation plan.

Douglas Hohlbaugh	Ohio Edison Company	4	Affirmative	FirstEnergy supports the proposed standards and would appreciate consideration of our comments submitted through the formal comment period.
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Response: The RCSDT thanks you for your comment. Your comments have been considered, Please see the Consideration of Comments document for FirstEnergy.

Ray Ellis	Okanogan County Electric Cooperative, Inc.	3	Negative	<p>Thank you for the opportunity to comment and for your hard work on this project: While we agree that effective Interpersonal Communications capability are integral to reliability, many Distribution Providers (DP) are small entities that do not maintain a 24-7 dispatch desk capable of receiving or responding to emergency reliability directives in a timely manner. It is our belief that some of the proposals in this project could unnecessarily force small entities to make investments that will not enhance reliability. Many DPs rely on answering services to address customer-service issues during non-business hours. On-call personnel are contacted in the event of an outage or emergency and crews are dispatched as appropriate. It is difficult to envision a BA or TOP issuing an Emergency Reliability Directive to a small entity (25 MW or so) which would require these smaller entities to comply with COM-001. Order 693 directs the inclusions of DPs in the COM-001-2 standard but it is our belief that the Commission offered language that GOs and DPs need not have redundant communications, training unrelated to normal/emergency operations, and that telecommunications requirements for entities will vary according to their function. We believe those intentions should be reflected in the language of this standard. We would suggest adding wording such as in the applicability section, "Distribution Providers who maintain a 24-7 control centers with the ability to manually shed load of at least 100 MW within a 15-minute operational window." Also, a note that smaller, rural entities can be dependent on a phone system provider that will not allow for backup communications. Should the communication line(s) be dependent on one main phone trunk line, the failure due to an issue on this main line will make it impossible to notify anyone of its failure short of physically traveling to an area where phone service is available. For some rural areas, this will exceed the one hour time limit to report the communication outage. Forcing smaller entities to acquire satellite phone service to mitigate for a phone outage is a high price to pay when no reliability improvement will be achieved. Suggested change could be: "... shall notify impacted entities within 60 minutes of the detection of a failure of its Interpersonal Communications capabilities that lasts 30 minutes or longer where alternate forms of communication are available within a 15 minute access time. Should alternate forms of communication</p>
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				not be available within the 15 minute access time, then upon reestablishment of Communication capabilities impacted entities will be notified of the past loss and current status of Communication." We've heard many representatives from FERC and NERC indicate that the standards development process has led the industry to take action in many cases for the sake of compliance while not necessarily enhancing reliability. As has been stated many times, the process should be about improving reliability, not about complying with standards. Unnecessarily including smaller entities that will NEVER receive an emergency reliability directive might be an example of the former.
<p>Response: The RCSDT thanks you for your comment. There is no requirement for 24/7 support. The requirement is to have communications capability. The type of system (e.g., On-Call) is not prescribed in the standard, and the standard is designed not to impose needless communications requirements. The purpose of COM-002 is, "to ensure emergency communications between operating personnel are <u>effective</u>." It's not a proxy requirement to establish 24/7 operating personnel at small distribution providers. The intent is to establish a <u>method</u> of communicating Reliability Directives during Emergencies. While it is true that many small Distribution Providers are not staffed 24x7, it is typical that they have a means of communication - in many cases this may be via a receptionist or answering service. 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. If this return call would not be timely enough, then the issuer would determine a different mitigation plan.</p>				
Margaret Ryan	Pacific Northwest Generating Cooperative	8	Negative	Thank you for the opportunity to comment and for your hard work on this project: While we agree that effective Interpersonal Communications capability are integral to reliability, many Distribution Providers (DP) are small entities that do not maintain a 24-7 dispatch desk capable of receiving or responding to emergency reliability directives in a timely manner. It is our belief that some of the proposals in this project could unnecessarily force small entities to make investments that will not enhance reliability. Many DPs rely on answering services to address customer-service issues during non-business hours. On-call personnel are contacted in the event of an outage or emergency and crews are dispatched as appropriate. It is difficult to envision a BA or TOP issuing an Emergency Reliability Directive to a small entity (25 MW or so) which would require these smaller entities to comply with COM-001. Order 693 directs the inclusions of DPs in the COM-001-2 standard but it is our belief that the Commission offered language that GOs and DPs need not have redundant communications, training unrelated to normal/emergency operations, and that telecommunications requirements for entities will vary according to their function. We believe those intentions should be reflected in the language of this standard. We would suggest adding wording such as in the applicability section, "Distribution Providers who maintain a 24-7 control centers with the ability to manually shed load of at least 100 MW within a 15-minute operational window." Also, a note that smaller, rural entities can be dependent on a phone system provider that will not allow for backup communications. Should the communication line(s) be dependent on one main phone trunk line, the failure due

				<p>to an issue on this main line will make it impossible to notify anyone of its failure short of physically traveling to an area where phone service is available. For some rural areas, this will exceed the one hour time limit to report the communication outage. Forcing smaller entities to acquire satellite phone service to mitigate for a phone outage is a high price to pay when no reliability improvement will be achieved. Suggested change could be: "... shall notify impacted entities within 60 minutes of the detection of a failure of its Interpersonal Communications capabilities that lasts 30 minutes or longer where alternate forms of communication are available within a 15 minute access time. Should alternate forms of communication not be available within the 15 minute access time, then upon reestablishment of Communication capabilities impacted entities will be notified of the past loss and current status of Communication." We've heard many representatives from FERC and NERC indicate that the standards development process has led the industry to take action in many cases for the sake of compliance while not necessarily enhancing reliability. As has been stated many times, the process should be about improving reliability, not about complying with standards. Unnecessarily including smaller entities that will NEVER receive an emergency reliability directive might be an example of the former.</p>
<p>Response: The RCSDT thanks you for your comment. There is no requirement for 24/7 support. The requirement is to have communications capability. The type of system (e.g., On-Call) is not prescribed in the standard, and the standard is designed not to impose needless communications requirements. The purpose of COM-002 is, "to ensure emergency communications between operating personnel are <u>effective</u>." It's not a proxy requirement to establish 24/7 operating personnel at small distribution providers. The intent is to establish a <u>method</u> of communicating Reliability Directives during Emergencies. While it is true that many small Distribution Providers are not staffed 24x7, it is typical that they have a means of communication - in many cases this may be via a receptionist or answering service. 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. If this return call would not be timely enough, then the issuer would determine a different mitigation plan.</p>				
Brenda L Truhe	PPL Electric Utilities Corp.	1	Negative	Comments were submitted as part of a group via the comment form. Thank you for your work on the standard.
<p>Response: The RCSDT thanks you for your comment. Your other comments have been considered. Please see the Consideration of Comments document.</p>				
Mark A Heimbach	PPL EnergyPlus LLC	6	Negative	<p>Comments: We thank the Standards Drafting Team for the improvements made in the revisions to COM-001 and COM-002. The revision appropriately clarifies the standard. We are providing the following comments for the Standards Drafting Team to consider.</p> <p>1) Consider changing R1 to 'Each RC shall have the capability for Interpersonal Communications with the following entities to exchange Interconnection and</p>

				<p>operating information...' for clarity as Interpersonal Communications and capability are both nouns.</p> <p>Response: Thank you for your suggestion to modify the sentence structure into a noun phrase. However the RCSDT believes the current form is unambiguous.</p> <p>2) We feel changing the applicability of the standard is important to the accuracy of the standard. The purpose of COM-002 is 'To ensure emergency communications between operating personnel are effective'. Since operating personnel are covered by the applicability of RC, BA, TOP and GOP, we suggest the applicability to TSP, LSE, and PSE be removed from COM-002-3.</p> <p>Response: The SDT agrees. The applicability of COM-002 has been revised. COM-001, and COM-002 are now applicable to the RC, TOP, BA, GOP and DP only.</p> <p>3) Additionally, we would like to bring to the attention of the Standards Drafting Team, that the implementation plan for COM-001-2 and IRO-001-2 still includes TSP, LSE, and PSE although the revised standard does not include these entities in the Applicability Section. For COM-001-2 refer to the implementation plan, page 11. For IRO-001-2 refer to the implementation plan for new R2, new R3, new R4 and the chart on the last page. Thank you for your consideration in addressing these comments.</p> <p>Response: The RCSDT has revised the implementation plans appropriately to address your comment.</p>
<p>Response: The RCSDT thanks you for your comments. .</p>				
Annette M Bannon	PPL Generation LLC	5	Negative	<p>We thank the Standards Drafting Team for the improvements made in the revisions to COM-001 and COM-002. The revision appropriately clarifies the standard. We are providing the following comments for the Standards Drafting Team to consider.</p> <p>1) Consider changing R1 to 'Each RC shall have the capability for Interpersonal Communications with the following entities to exchange Interconnection and operating information...' for clarity as Interpersonal Communications and capability are both nouns.</p> <p>Response: Thank you for your suggestion to modify the sentence structure into a noun phrase. However the RCSDT believes the current form is unambiguous.</p> <p>2) We feel changing the applicability of the standard is important to the accuracy of the standard. The purpose of COM-002 is 'To ensure emergency communications</p>

				<p>between operating personnel are effective'. Since operating personnel are covered by the applicability of RC, BA, TOP and GOP, we suggest the applicability to TSP, LSE, and PSE be removed from COM-002-3.</p> <p>Response: We agree. The applicability of COM-002 has been revised. COM-001, and COM-002 are now applicable to the RC, TOP, BA, GOP and DP only.</p> <p>3) Additionally, we would like to bring to the attention of the Standards Drafting Team, that the implementation plan for COM-001-2 and IRO-001-2 still includes TSP, LSE, and PSE although the revised standard does not include these entities in the Applicability Section. For COM-001-2 refer to the implementation plan, page 11. For IRO-001-2 refer to the implementation plan for new R2, new R3, new R4 and the chart on the last page. Thank you for your consideration in addressing these comments.</p> <p>Response: The RCSDT has revised the implementation plans appropriately to address your comment.</p>
<p>Response: The RCSDT thanks you for your comments.</p>				
John T Sturgeon	Progress Energy	6	Negative	<p>COM-001-2 R10 states that "Each Reliability Coordinator, Transmission Operator, Balancing Authority, Distribution Provider and Generator Operator shall notify impacted entities within 60 minutes of the detection of a failure of its Interpersonal Communications capabilities that last 30 minutes or longer". The standard states that the RC, TOP, BA shall designate an Alternative Interpersonal Communication capability but does not require the same of the DP and GOP. Compliance by the DP and GOP with R10 would be jeopardized while still being compliant with the rest of the standard by having only the Interpersonal Communications capability.</p> <p>Response: The DP or GOP has access to additional Interpersonal Communications, in all likelihood, to make notifications for failure. There is not a requirement for an alternative, but it is likely that someone could use a cell phone to make the notification. The RCSDT is proposing to add Part 7.3 and 8.3 to the requirements as follows:</p> <p>7.3 Each Distribution Provider that experiences a failure of its Interpersonal Communication capabilities shall consult with their Transmission Operator or Balancing Authority to determine a mutually agreeable time to restore its Interpersonal Communication capability.</p> <p>8.3 Each Generator Operator that experiences a failure of its Interpersonal Communication capabilities shall consult with their Transmission Operator or Balancing Authority to determine a mutually</p>

				<p>agreeable time to restore its Interpersonal Communication capability.</p> <p>The phrase “within” used in R3-R6 does not take into account that there are electrically adjacent BAs/TOPs who are not “within” each other’s area.</p> <p>Response: The requirements are dealing with entities within the Area or entities that operate Facilities located within the Area. We have also added the following to R3:</p> <p style="padding-left: 40px;">Adjacent Transmission Operators synchronously connected within the same Interconnection.</p> <p>The SDT also added, ‘adjacent Balancing Authorities’ to Requirements R4, R5 and R6.</p>
<p>Response: The RCSDT thanks you for your comment.</p>				
Peter Dolan	PSEG Energy Resources & Trade LLC	6	Negative	<p>Com-001-2 implementation plan lists that this is applicable to PSE’s and LSE’s however, PSE’s and LSE’s were removed from the actual standard. The implementation plan should be revised. Com-002-3 standard continues to include PSE. PSE’s do not play an active role in operating the BES and have no authority or ability to perform reliability coordination related tasks as may be directed by a RC. PSE’s should be removed from the standard.</p> <p>IRO-001-2 references PSE’s in the implementation for R2, R3, R4 and “Functions that must comply with the requirements in this standard” table. PSE’s were removed from the standard and should be removed from the implementation plan.</p>
<p>Response: The RCSDT thanks you for your comment. The applicability of COM-002 has been revised. COM-001, and COM-002 are now applicable to the RC, TOP, BA, GOP and DP only.</p> <p>The RCSDT has revised the implementation plans appropriately to address your comment.</p>				
Kenneth D. Brown	Public Service Electric and Gas Co.	1	Negative	<p>Com-001-2 implementation plan lists that this is applicable to PSE’s and LSE’s however, PSE’s and LSE’s were removed from the actual standard. The implementation plan should be revised. Com-002-3 standard continues to include PSE. PSE’s do not play an active role in operating the BES and have no authority or ability to perform reliability coordination related tasks as may be directed by a</p>

				<p>RC. PSE's should be removed from the standard.</p> <p>IRO-001-2 references PSE's in the implementation for R2, R3, R4 and "Functions that must comply with the requirements in this standard" table. PSE's were removed from the standard and should be removed from the implementation plan.</p>
<p>Response: The RCSDT thanks you for your comment. The applicability of COM-002 has been revised. COM-001, and COM-002 are now applicable to the RC, TOP, BA, GOP and DP only.</p> <p>The RCSDT has revised the implementation plans appropriately to address your comment.</p>				
Jeffrey Mueller	Public Service Electric and Gas Co.	3	Negative	<p>PSEG opposes this standard for the following reasons: Com-001-2 implementation plan lists that this is applicable to PSE's and LSE's however, PSE's and LSE's were removed from the actual standard. The implementation plan should be revised. Com-002-3 standard continues to include PSE. PSE's do not play an active role in operating the BES and have no authority or ability to perform reliability coordination related tasks as may be directed by a RC. PSE's should be removed from the standard.</p> <p>IRO-001-2 references PSE's in the implementation for R2, R3, R4 and "Functions that must comply with the requirements in this standard" table. PSE's were removed from the standard and should be removed from the implementation plan.</p>
<p>Response: The RCSDT thanks you for your comment. The applicability of COM-002 has been revised. COM-001, and COM-002 are now applicable to the RC, TOP, BA, GOP and DP only.</p> <p>The RCSDT has revised the implementation plans appropriately to address your comment.</p>				
Dominick Grasso	Public Service Enterprise Group Incorporated	5	Negative	<p>COM-001-2 implementation plan lists that this is applicable to PSE's and LSE's however, PSE's and LSE's were removed from the actual standard. The implementation plan should be revised. COM-002-3 standard continues to include PSE. PSE's do not play an active role in operating the BES and have no authority or ability to perform reliability coordination related tasks as may be directed by a RC. PSE's should be removed from the standard.</p> <p>IRO-001-2 references PSE's in the implementation for R2, R3, R4 and "Functions that must comply with the requirements in this standard" table. PSE's were removed from the standard and should be removed from the implementation plan.</p>
<p>Response: The RCSDT thanks you for your comment. The applicability of COM-002 has been revised. COM-001, and COM-002 are now applicable to the RC, TOP, BA, GOP and DP only.</p>				

The RCSDT has revised the implementation plans appropriately to address your comment.

Steven Grega	Public Utility District No. 1 of Lewis County	5	Negative	These changes do not recognize that many small utilities do not have 24-hour dispatch, do not have SCADA systems or do not man generation plants 24-hours a day. Specific exception should be written into the standards to provide relief for small GO, GOP, LSE and DP. The standard changes need to address notifications if personnel are only available on a on-call basis.
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Response: The RCSDT thanks you for your comment. There is no requirement for 24/7 support. The requirement is to have communications capability. The type of system (e.g., On-Call) is not prescribed in the standard, and the standard is designed not to impose needless communications requirements. The purpose of COM-002 is, "to ensure emergency communications between operating personnel are effective." It's not a proxy requirement to establish 24/7 operating personnel at small distribution providers. The intent is to establish a method of communicating Reliability Directives during Emergencies. While it is true that many small Distribution Providers are not staffed 24x7, it is typical that they have a means of communication - in many cases this may be via a receptionist or answering service. 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. If this return call would not be timely enough, then the issuer would determine a different mitigation plan.

Heber Carpenter	Raft River Rural Electric Cooperative	3	Negative	Thank you for the opportunity to comment and for your hard work on this project: While we agree that effective Interpersonal Communications capability are integral to reliability, many Distribution Providers (DP) are small entities that do not maintain a 24-7 dispatch desk capable of receiving or responding to emergency reliability directives in a timely manner. It is our belief that some of the proposals in this project could unnecessarily force small entities to make investments that will not enhance reliability. Many DPs rely on answering services to address customer-service issues during non-business hours. On-call personnel are contacted in the event of an outage or emergency and crews are dispatched as appropriate. It is difficult to envision a BA or TOP issuing an Emergency Reliability Directive to a small entity (25 MW or so) which would require these smaller entities to comply with COM-001. Order 693 directs the inclusions of DPs in the COM-001-2 standard but it is our belief that the Commission offered language that GOs and DPs need not have redundant communications, training unrelated to normal/emergency operations, and that telecommunications requirements for entities will vary according to their function. We believe those intentions should be reflected in the language of this standard. We would suggest adding wording such as in the applicability section, "Distribution Providers who maintain a 24-7 control centers with the ability to manually shed load of at least 100 MW within a 15-minute operational window." Also, a note that smaller, rural entities can be dependent on a phone system provider that will not allow for backup communications. Should the communication line(s) be dependent on one main phone trunk line, the failure due
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				<p>to an issue on this main line will make it impossible to notify anyone of its failure short of physically traveling to an area where phone service is available. For some rural areas, this will exceed the one hour time limit to report the communication outage. Forcing smaller entities to acquire satellite phone service to mitigate for a phone outage is a high price to pay when no reliability improvement will be achieved. Suggested change could be: "... shall notify impacted entities within 60 minutes of the detection of a failure of its Interpersonal Communications capabilities that lasts 30 minutes or longer where alternate forms of communication are available within a 15 minute access time. Should alternate forms of communication not be available within the 15 minute access time, then upon reestablishment of Communication capabilities impacted entities will be notified of the past loss and current status of Communication." We've heard many representatives from FERC and NERC indicate that the standards development process has led the industry to take action in many cases for the sake of compliance while not necessarily enhancing reliability. As has been stated many times, the process should be about improving reliability, not about complying with standards. Unnecessarily including smaller entities that will NEVER receive an emergency reliability directive might be an example of the former.</p>
<p>Response: The RCSDT thanks you for your comment. There is no requirement for 24/7 support. The requirement is to have communications capability. The type of system (e.g., On-Call) is not prescribed in the standard, and the standard is designed not to impose needless communications requirements. The purpose of COM-002 is, "to ensure emergency communications between operating personnel are <u>effective</u>." It's not a proxy requirement to establish 24/7 operating personnel at small distribution providers. The intent is to establish a <u>method</u> of communicating Reliability Directives during Emergencies. While it is true that many small Distribution Providers are not staffed 24x7, it is typical that they have a means of communication - in many cases this may be via a receptionist or answering service. 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. If this return call would not be timely enough, then the issuer would determine a different mitigation plan.</p>				
Anthony E Jablonski	ReliabilityFirst Corporation	10	Negative	<p>1. General comments a. The standards should be balloted individually rather than balloted as a group. Response: The SDT agrees, and will be balloting the standards individually.</p> <p>2. COM-001-2 a. The "R" should be removed from all sub requirements (they should be referenced as parts) A Response: The SDT agrees. This has been corrected.</p> <p>3. IRO-005-4 a. Fix typo in R1. Insert the word "and" between the words "notify issue" b. Response: This typo has been addressed through other edits</p> <p>4. IRO-001-2 a. The Electric Reliability Organization (ERO) listed in the Applicability</p>

				<p>section and R1 is neither a user, owner nor operator of the BES and such should not be subject to Reliability Standards.</p> <p>Response: Many commenters suggested removing the requirement because it is addressed in the NERC Rules of Procedure. The RCSDT concurs and has removed R1 from IRO-001-2.</p>
<p>Response: The RCSDT thanks you for your comment. Please see responses above.</p>				
Ken Dizes	Salmon River Electric Cooperative	3	Negative	<p>Thank you for the opportunity to comment and for your hard work on this project: While we agree that effective Interpersonal Communications capability are integral to reliability, many Distribution Providers (DP) are small entities that do not maintain a 24-7 dispatch desk capable of receiving or responding to emergency reliability directives in a timely manner. It is our belief that some of the proposals in this project could unnecessarily force small entities to make investments that will not enhance reliability. Many DPs rely on answering services to address customer-service issues during non-business hours. On-call personnel are contacted in the event of an outage or emergency and crews are dispatched as appropriate. It is difficult to envision a BA or TOP issuing an Emergency Reliability Directive to a small entity (25 MW or so) which would require these smaller entities to comply with COM-001. Order 693 directs the inclusions of DPs in the COM-001-2 standard but it is our belief that the Commission offered language that GOs and DPs need not have redundant communications, training unrelated to normal/emergency operations, and that telecommunications requirements for entities will vary according to their function. We believe those intentions should be reflected in the language of this standard. We would suggest adding wording such as in the applicability section, "Distribution Providers who maintain a 24-7 control centers with the ability to manually shed load of at least 100 MW within a 15-minute operational window." Also, a note that smaller, rural entities can be dependent on a phone system provider that will not allow for backup communications. Should the communication line(s) be dependent on one main phone trunk line, the failure due to an issue on this main line will make it impossible to notify anyone of its failure short of physically traveling to an area where phone service is available. For some rural areas, this will exceed the one hour time limit to report the communication outage. Forcing smaller entities to acquire satellite phone service to mitigate for a phone outage is a high price to pay when no reliability improvement will be achieved. Suggested change could be: "... shall notify impacted entities within 60 minutes of the detection of a failure of its Interpersonal Communications capabilities that lasts 30 minutes or longer where alternate forms of communication are available within a 15 minute access time. Should alternate forms of communication not be available within the 15 minute access time, then upon reestablishment of</p>

				<p>Communication capabilities impacted entities will be notified of the past loss and current status of Communication." We've heard many representatives from FERC and NERC indicate that the standards development process has led the industry to take action in many cases for the sake of compliance while not necessarily enhancing reliability. As has been stated many times, the process should be about improving reliability, not about complying with standards. Unnecessarily including smaller entities that will NEVER receive an emergency reliability directive might be an example of the former.</p>
<p>Response: The RCSDT thanks you for your comment. There is no requirement for 24/7 support. The requirement is to have communications capability. The type of system (e.g., On-Call) is not prescribed in the standard, and the standard is designed not to impose needless communications requirements. The purpose of COM-002 is, "to ensure emergency communications between operating personnel are <u>effective</u>." It's not a proxy requirement to establish 24/7 operating personnel at small distribution providers. The intent is to establish a <u>method</u> of communicating Reliability Directives during Emergencies. While it is true that many small Distribution Providers are not staffed 24x7, it is typical that they have a means of communication - in many cases this may be via a receptionist or answering service. 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. If this return call would not be timely enough, then the issuer would determine a different mitigation plan.</p>				

Carter B. Edge	SERC Reliability Corporation	10	Negative	<p>If the following issues are addressed in the standards revisions I should be able to cast an affirmative vote:</p> <p>COM-001-2</p> <ul style="list-style-type: none"> o Each sub-requirement should not have an “R” in front of the number in order to be consistent with NERC’s August 10, 2009 filing at FERC on this subject. Response: The SDT agrees. This has been corrected. o Requirement R3 and R4 should include adjacent TOPs as a sub-requirement. Response: The SDT agrees. The SDT modified R3 and R4 to add adjacent TOPs o Requirements R5 and R6 should include adjacent BAs as a sub-requirement. Response: The SDT added adjacent Balancing Authorities to Requirements R4, R5 and R6. o “to exchange Interconnection and operating information” should be deleted from requirements R1 through R8 as it is redundant with the definition of Interpersonal Communications Response: The SDT agrees. The SDT adopted this suggestion and deleted this phrase. o The last page of the Implementation Plan includes LSEs, PSE, and TSPs as being responsible entities under this standard, yet the standard does not include them. Please correct the implementation plan. Response: The implementation plan was corrected as proposed. <p>TOP-001-1,</p> <ul style="list-style-type: none"> o Requirement R3, which is what the SDT appears to be using as its justification for not adding a requirement here is proposed to be deleted by the RTO-SDT on Project 2007-03. IRO-001-2 R2-R4 deal with complying with directives or instruction and is the justification for retiring TOP-001, R3. <p>IRO-001-2</p> <ul style="list-style-type: none"> o I’m unclear on the language of R1. I think you are attempting to create a
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			<p>requirement similar to BAL-005, R1 where all generation, transmission, and load operating within an Interconnection must be included within the metered boundaries of a Balancing Authority Area. If that is the case, suggested language could be "All Balancing Areas and Transmission Operators must be under the authority of a Reliability Coordinator certified by the ERO to continuously assess transmission reliability and coordinate emergency operations within each region and across the regional boundaries"</p> <p>Response: Many commenters suggested removing the requirement because it is addressed in the NERC Rules of Procedure. The RCSDT concurs and has removed R1 from IRO-001-2.</p> <p>o Please remove the yellow box on page 1 indicating this standard will be retired.</p> <p>Response: The SDT agrees, and has made the change.</p> <p>Additional comments:</p> <p>o Reliability Directives may be issued by blast calls from Reliability Coordinators. It is inefficient and may be a hindrance to reliability to require 3-part communications in these instances.</p> <p>Response: The RCSDT agrees that the use of Blast Call's to issue Reliability Directives, in mass, is efficient and effective. However the essence of accurately implementing Reliability Directives is accomplished by use of 3-part communications. The RCSDT believes Reliability Directives issued in mass should be defined by procedure, and that the procedure would establish a method of affirmation and notice of implementation. As envisioned, communications protocols such as the procedure you've proposed will be addressed in the COM-003 standard being developed in Project 2007-02.</p> <p>o There are several organizations registered as BAs, RCs and TOPs. It is not uncommon for those entities to be distributed across multiple desks in the same control room without regard to how an entity is registered. Thus, a single System Operator may perform functions that are categorized under two or more of those functional entities. The drafting team should clarify that under no circumstances should that System Operator be required to issue a Reliability Directive to himself. This is a corporate governance issue.</p> <p>Response: COM-002 does not preclude text or other forms of communication for issuing Reliability Directives. However, entities still must comply with the requirements of COM-002. Further, the RCSDT believes it to be equally imperative that each NERC registered function hold the authority to issue</p>
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			<p>Reliability Directives, and the ability to receive Reliability Directives, whether those Reliability Directives are issued to subordinate registered functions within a vertically integrated utility, or to registered entities that are corporately separate. The RCSDT believes the following response to draft 3 comments still holds true:</p> <p style="padding-left: 40px;">“The way that COM-002 is crafted, it focuses on functional entity communication between and among functions. Face-to-face communication of Reliability Directives are subject to the requirements of COM-002 and can be measured for COM-002 by allowing Operator Logs as possible evidence to support compliance.”</p> <p>The use of operator logs to memorialize and provide evidence of compliance is directly specific to those Reliability Directives issued and received within the same control room or operations center. The RCSDT believes that any Registered Entity or person operating as such must understand the intent of the issued Reliability Directive, and that the issuer of the Reliability Directive believe that the Reliability Directive was correctly received. COM-002 should not be construed to mean that an individual serving in two functions be required to issue a Reliability Directive to himself, but rather it is expected that such an individual would appropriately address the reliability issues as required by the function they are serving and its subsequent responsibilities.</p> <p>o In IRO-014, R1, delete sub-requirement 1.7. The requirement for weekly conference calls related to operating procedures is duplicative to R4 and could be burdensome while adding very little value under certain circumstances.</p> <p>R1, Part 1.7 indicates that the Operating Plan, process or Procedure is to include how the entity will accomplish these calls. R4 requires the entity to actually perform them.</p> <p>Response: The intent of R1 is for Reliability Coordinators to coordinate specific activities with other impacted Reliability Coordinators. These activities are listed as Parts. Part 1.7 is requires you to have a procedure relating to weekly conference calls while R4 requires participation in weekly calls. Further the RCSDT believes that it is prudent that Reliability Coordinators talk at least once a week to verify viability of mutual plans, procedures or processes.</p> <p>o In IRO-014, R4, delete the phrase “(per Requirement 1, Part 1.7)” as a conforming change.</p> <p>Response: The intent of R1 is for Reliability Coordinators to coordinate specific activities with other impacted Reliability Coordinators, these activities are listed as sub requirements. Part 1.7 is requires you to have a procedure relating to weekly</p>
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				<p>conference calls while R4 requires participation in weekly calls. Further the RCSDT believes that it is prudent that Reliability Coordinators talk at least once a week to verify viability of mutual plans, procedures or processes.</p> <p>o I believe that the intent of IRO-014, Requirements R6-R8 is to require conservative operation by all affected Reliability Coordinators if any Reliability Coordinator detects an Adverse Reliability Impact. It could be read to allow at least the theoretical possibility that an RC may determine an Adverse Reliability Impact in another RC's area that the other RC neither can see nor believes that any action should be taken. R7 puts the burden on the first RC to develop a plan that it cannot implement because it has no agreement with the BAs and TOPs in the other RC area and thus could be ineffective. Alternately, it could be read that the identifying RC must take action in its own area to mitigate the Adverse Reliability Impact identified in another area much like the "general prudential rule" in the Coast Guard's Rules of the Road where regardless of what the rules state if action can be taken to avoid a collision at sea, that action must be taken. Please clarify.</p> <p>Response: Requirements R6-R8 are translated from IRO-016-1, Requirement R1. If an RC sees a problem and another does not see the same problem, then there may be an issue with someone's model or processes or procedures. The RC's are supposed to have coordinated Operating Plans, Processes or Procedures to operate reliably. R6-R8 are only applicable if one of the two (or more) RCs do not see that a problem exists. It would be a detriment to reliability for both RCs to take no action. RCs are required to coordinate actions under existing IRO-016-1, R1. If one RC identifies a problem and provides an action plan to another RC to mitigate the problem, the second RC is obligated under R8 to implement it. We have revised the R8 to clarify this intent.</p> <p>IRO-014-2, Revised R8. During those instances where Reliability Coordinators disagree on the existence of an Adverse Reliability Impact , each Reliability Coordinator shall implement the action plan developed by the Reliability Coordinator that identified the Adverse Reliability Impact unless such actions would violate safety, equipment, regulatory or statutory requirements.</p> <p>o Please review all the implementation plans to be sure the applicable entities match those in the standards.</p> <p>Response: The Implementation Plans have been modified to address this concern.</p>
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Response: The RCSDT thanks you for your comment. Please see responses above.

Paul Benjamin Kerr	Shell Energy North America (US), L.P.	6	Affirmative	<p>The introduction of the definition of “Reliability Directive” and its connection to the definition of “Emergency” within this Project brings much needed clarity for the sector and will promote consistency between Regional Entities and within the audits of Registered Entities. Shell Energy supports the removal of Purchasing Selling Entities as a function to which IRO-001 applies. This removal recognizes that PSEs do not play a role in reliability coordination under this standard since they have no authorities and no abilities to assume or perform responsibilities associated with reliability coordination. This conclusion is reinforced by the adoption of the defined term “Reliability Directive”. Where a RC, TOP, or BA needs to address an Emergency they do not contact, consult, or direct a PSE to take action that would address the Emergency. Rather, where the PSE is a user of the grid to perform or execute transactions, it is subject to the actions of these other entities that have the authority to stop, curtail, or alter the submitted transactions of the PSE in a way that aids in resolving the problem. With the fitting adoption of “Reliability Directive” into COM-002 as well, Shell Energy does not believe it is necessary or appropriate for the applicability of this standard to include Purchasing Selling Entities, as is contained in the current draft proposal. This standard does not apply to PSEs today, however, during the progression of Project 2006-06 this applicability was added to an early draft version that preceded the discussions and clarification that comes from the definition of a Reliability Directive in the standard. Shell Energy does not support the inclusion of PSEs in the current draft version of COM-002, and feels that it should be removed. The purpose of this standard is, “To ensure Emergency communications between operating personnel are effective” and relates directly to the capabilities and authorities established for the RC, TOP, or BA that requires actions to be taken by a recipient of a Reliability Directive. As noted previously, PSEs are acted upon by the entities with the necessary authority, and are not in a role that would initiate or fulfil the required actions. As additional matters related to the clarification and cleanup of the standards in this project, the implementation plans for both IRO-001 and COM-001 erroneously contain references to PSEs in the sections “Functions that Must Comply with the Requirements”. These references need to be removed.</p>
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Response: The RCSDT thanks you for your comment. The applicability of COM-001, and COM-002 were revised to be consistent and only include the RC, TOP, BA, DP and GOP. The Implementation Plans have been corrected.

Robert A Schaffeld	Southern Company	1	Affirmative	Please see comments
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	Services, Inc.			
<p>Response: The RCSDT thanks you for your comment. Please see response to those comments.</p>				
Ronald L Donahey	Tampa Electric Co.	3	Negative	Our only disagreement is with the use of the term "Reliability" in defining a directive.
<p>Response: The RCSDT thanks you for your comment. The term "Reliability Directive" was chosen to specifically delineate between other types of directives, such as market directives. It is imperative that reliability standards relate to reliability concerns.</p>				
Steve Eldrige	Umatilla Electric Cooperative	3	Negative	<p>Thank you for the opportunity to comment and for your hard work on this project: While we agree that effective Interpersonal Communications capability are integral to reliability, many Distribution Providers (DP) are small entities that do not maintain a 24-7 dispatch desk capable of receiving or responding to emergency reliability directives in a timely manner. It is our belief that some of the proposals in this project could unnecessarily force small entities to make investments that will not enhance reliability. Many DPs rely on answering services to address customer-service issues during non-business hours. On-call personnel are contacted in the event of an outage or emergency and crews are dispatched as appropriate. It is difficult to envision a BA or TOP issuing an Emergency Reliability Directive to a small entity (25 MW or so) which would require these smaller entities to comply with COM-001. Order 693 directs the inclusions of DPs in the COM-001-2 standard but it is our belief that the Commission offered language that GOs and DPs need not have redundant communications, training unrelated to normal/emergency operations, and that telecommunications requirements for entities will vary according to their function. We believe those intentions should be reflected in the language of this standard. We would suggest adding wording such as in the applicability section, "Distribution Providers who maintain a 24-7 control centers with the ability to manually shed load of at least 100 MW within a 15-minute operational window." Also, a note that smaller, rural entities can be dependent on a phone system provider that will not allow for backup communications. Should the communication line(s) be dependent on one main phone trunk line, the failure due to an issue on this main line will make it impossible to notify anyone of its failure short of physically traveling to an area where phone service is available. For some rural areas, this will exceed the one hour time limit to report the communication outage. Forcing smaller entities to acquire satellite phone service to mitigate for a phone outage is a high price to pay when no reliability improvement will be achieved. Suggested change could be: "... shall notify impacted entities within 60 minutes of the detection of a failure of its Interpersonal Communications capabilities</p>

				that lasts 30 minutes or longer where alternate forms of communication are available within a 15 minute access time. Should alternate forms of communication not be available within the 15 minute access time, then upon reestablishment of Communication capabilities impacted entities will be notified of the past loss and current status of Communication." We've heard many representatives from FERC and NERC indicate that the standards development process has led the industry to take action in many cases for the sake of compliance while not necessarily enhancing reliability. As has been stated many times, the process should be about improving reliability, not about complying with standards. Unnecessarily including smaller entities that will NEVER receive an emergency reliability directive might be an example of the former.
<p>Response: The RCSDT thanks you for your comment. There is no requirement for 24/7 support. The requirement is to have communications capability. The type of system (e.g., On-Call) is not prescribed in the standard, and the standard is designed not to impose needless communications requirements. The purpose of COM-002 is, "to ensure emergency communications between operating personnel are <u>effective</u>." It's not a proxy requirement to establish 24/7 operating personnel at small distribution providers. The intent is to establish a <u>method</u> of communicating Reliability Directives during Emergencies. While it is true that many small Distribution Providers are not staffed 24x7, it is typical that they have a means of communication - in many cases this may be via a receptionist or answering service. 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. If this return call would not be timely enough, then the issuer would determine a different mitigation plan.</p>				
Jonathan Appelbaum	United Illuminating Co.	1	Negative	<p>See UI Comment form, In General:</p> <p>1. COM-001-2 does not specify the amount of time a DP has to reestablish the Interpersonal Communication Capability after the capability fails before it is assessed non-compliance for not having the communication.</p> <p>Response: The DP or GOP has access to additional Interpersonal Communications, in all likelihood, to make notifications for failure. There is not a requirement for an alternative, but it is highly unlikely that someone couldn't use their cell phone to make the notification. The RCSDT is proposing to add Part 7.3 and 8.3 to the requirements as follows:</p> <p>7.3 Each Distribution Provider that experiences a failure of its Interpersonal Communication capabilities shall consult with their Transmission Operator or Balancing Authority to determine a mutually agreeable time to restore its Interpersonal Communication capability.</p> <p>8.3 Each Generator Operator that experiences a failure of its Interpersonal Communication capabilities shall consult with their Transmission Operator or Balancing Authority to determine a mutually agreeable time to restore its Interpersonal Communication capability.</p>

				<p>2. VSL for R7 should have a time component</p> <p>Response: The VSL represents a single violation of the requirement. For this requirement, the DP must have Interpersonal Communication with its TOP and BA. The VSL was revised to remove “or more” to conform to the requirement. Because the Requirement does not have a time component, the SDT cannot add a time component to the VSL – this would violate one of the FERC Guidelines for setting VSLs.</p> <p>3. R7 should address the instance if the DP is not required to have communication with the BA, because the BA communicates thru the TOP.</p> <p>Response: The RCSDT believes that Interpersonal Communication between the DP and its BA and the TOP is required for reliability.</p> <p>4. COM-002 R2 seems awkwardly worded. R2 as it is written says the repeat is confirming the accuracy of the message itself. I think it is agreed that the repeat back in R2 is to allow the issuer of the Directive to confirm that the message was received accurately understood by the recipient.</p> <p>Response: The RCSDT has revised the requirement and has removed “with enough details that the accuracy of the message was confirmed” from the requirement.</p> <p>5. The VSL for Com-002 R2 is severe and states "The responsible entity that was the recipient of a Reliability Directive failed to repeat, restate, rephrase or recapitulate the Reliability Directive with enough details that the accuracy of the message was confirmed." The purpose of the R2 repeat-back is to allow the Issuer verify the message was accurately received. This VSL penalizes the responsible entity for not accurately receiving the message. The VSL should penalize the refusal of the registered entity to repeat back the message not for receiving the message incorrectly.</p> <p>Response: The RCSDT agrees and has removed “with enough details that the accuracy of the message was confirmed” from the VSL.</p>
<p>Response: The RCSDT thanks you for your comment. Please see responses above.</p>				
Allen Klassen	Westar Energy	1	Negative	The new definition of Alternative Interpersonal Communication in COM-001 appears to rule out the use of redundant systems that happen to be used daily, which might be done to ensure that they function when needed.

Response: The RCSDT thanks you for your comment. The intent of Alternative Interpersonal Communication (AIC) is to make sure there is an alternative in case the Interpersonal Communication fails. If you have two, you may designate one as the AIC regardless of how often you use it.

Forrest Brock	Western Farmers Electric Coop.	1	Negative	<p>COM-001 - Definition of Interpersonal Communication needs more clarification. For example, would this include data exchanged via ICCP? Examples of what constitutes "Interconnection and operating information" would help as much "information" can be interpreted as fitting into this - or not.</p> <p>Response: Interpersonal Communication does not include data exchange.</p> <p>Severe VSL for R9 - second part after the "OR" is a virtual repetition of the wording in the Lower VSL for R9.</p> <p>Response: The Severe VSL was revised to remove "within 2 hours". It now reads:</p> <p style="padding-left: 40px;">"The responsible entity tested the Alternative Interpersonal Communications capability and identified a problem but didn't initiate action to repair or designate a replacement Alternative Interpersonal Communications."</p> <p>COM-003 - R3 contains a typographical or grammar error. "...Reliability Directive as per Requirement R2 IS correct..." not AS correct...</p> <p>Response: Assuming you meant COM-002-3, the SDT agrees and has made the correction.</p>
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Response: The RCSDT thanks you for your comment. Please see responses above.

Anthony Jankowski	Wisconsin Energy Corp.	4	Affirmative	Please correct the clean version of IRO-005 R1 to match the red-line.
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Response: The RCSDT thanks you for your comment. We have made the corrections.

Michael Ibold	Xcel Energy, Inc.	3	Affirmative	While we appreciate the drafting team's efforts to clarify the multiple effective dates, we feel it is still daunting and complex, which leaves too much room for miscalculation. We recommend that NERC and/or the drafting team publish what the actual effective dates are, as soon as FERC (and again when the other regulatory authorities) have approved it. This could either be done in the effective
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				date section of the standard itself, or as a stand-alone reference document posted along with the standard on NERC's website.
Response: The RCSDT thanks you for your comment. We will pass your comment on the NERC Standards Process Manager for consideration.				
James A Maenner		8	Negative	In comments (Reliability Coordination - Project 2006-06) Midwest ISO raised a number of issues that need to be addressed prior to passage of these standards.
Response: The RCSDT thanks you for your comment. Please see responses to comments made by MISO on the initial ballot as well as the regular comment form.				

END OF REPORT