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Individual
Steve Alexanderson
Central Lincoln
Comments: The inclusion of load serving entities and distribution providers does not address any present reliability gap. R4 is extremely vague, and is not likely to be interpreted consistently. What form of evidence will be acceptable? Photos of telephones?
No
Comments: M4 is of little help regarding R4. How does an entity perform this demonstration, especially in the case of an off-site audit? If left to the regions, there will be no consistency.
No
The severity levels have little or no relationship to reliability. Failure to provide a evidence of an agreement per R3, for example, has no impact on reliability by itself; yet it carries the maximum VSL. In reality, the impact would only be severe if the use of an alternate language resulted in a miscommunication.
No
The inclusion of load serving entities and distribution providers does not address any present BES reliability gap.
No
M2 goes beyond R2 in requiring recordings. This will be cost prohibitive for small entities that have little impact on the BES. Telephone recording equipment will be needed on company phones. and some way to handle the recording of

directives and responses that occur after hours on home or cell phones must be handled. Drafters seem to have missed the fact that not all the applicable entities have 24/7 dispatch centers.

Empty table rows for comments.

Individual

Virginia Cook

JEA

R2 I would suggest that R2 be clarified so that it is understood that the 60 minutes starts at the beginning of the outage (or the end of the 30 minute period, if that was instead the intent) so that there can be no confusion about when the clock starts for notification periods. Otherwise, the wording of these standards is clearer than the current version. R4 I am concerned that with the word "capabilities" that the DP/GO's will be expected by the auditors to demonstrate that its "capability" was working every single second of every day since their last audit, especially since you have not included a data retention period(especially since this is rated a "high" VRF).

Yes

M1 - very nice, probably we will also be held responsible for completing the mitigation plans, so perhaps you should go ahead and add that so no one gets caught without sufficient evidence in that regard M2 - fine M3 - this measure would indicate that operators have the authority to agree among themselves to speak other languages, rather than a more formal agreement between entities, which is how I read the language of the requirement. If that is not what is meant, then I would suggest the examples include Memorandums of Agreement or Understanding, Contracts or other more formal mechanisms. M4 - fine

Yes

Empty table row.

No

R1: just to avoid possible auditor misunderstandings the SDT might consider replacing the words "or repeat the original statement" to "reissue the directive" so that the RC does not get into trouble if the second statement is not verbatim of the first. This also helps clarify that another statement is required from the recipient along with a final acknowledgement from the RC that the intent is correct.

No

Not all entities have recorded lines. The standard does not directly require the to record their lines, but the measure implies it. It seems that a written log should be sufficient. Since both sides of the conversation gets audited, the auditors will have ample opportunity to check up on both sides.

Yes

Empty table rows for comments.

Individual

Daniel Duff

Liberty Electric Power LLC

Empty table row.

Yes

Empty table row.

Yes

Empty table row.

No
The proposed standard does not require the RC, TO, or BA to declare an emergency to the GO when issuing a directive. There has been confusion at times in the past as to whether the entity is issuing a directive based on economics or due to an emergency. The standard should be amended to require the RC/TO/BA to state the directive is due to a declared emergency. The GO is required to repeat back the intent of an emergency directive, but is not required to repeat back the intent of economic directive. This can lead to a finding of a severe VSL non-compliance on the part of the GO due to a failure of the RC/TO/BA to clearly state the nature of the directive.
Yes
Yes
Yes
No
Similar objection to COM-002-3: There should be a requirement to the RC to declare the nature of the directive, emergency or economic.
Yes
No
The VSL's have a "Severe" VSL attached to a GO who fails to inform the RC when the Go becomes aware it is are unable to fully comply with a directive. However, the RC failing to inform two TO's - who potentially could have many GOs supplying power to their systems - of an emergency is only a "Moderate" VSL.
Yes
Yes
Yes
Group
Northwest LSE Group
Russell A. Noble
Cowlitz County PUD
No
The RC STD has done a commendable effort. However, it is questionable how expanding the applicability to include LSEs, DPs, & PSEs that are non-scheduling/tagging entities will increase reliability of the BES. In fact, we believe that increasing the applicability could do just the opposite. Many of these entities that are only registered as a LSE, DP, and/or PSE do not have a 24/7 desk/dispatch facility to receive RC/BA/TOP reliability directives, and are too small (10s of MW) to effectively assist during a reliability crisis. In addition, the Regional Entities (WECC in this case) are overwhelmed as it is, asking them to take on even more audit responsibilities is unrealistic, and not worth the effort. In addition, for the small Registered Entity, what would constitute compliance with R3 & R4 if no TOP/BA real-time directives were received? Everyone employed speaks English and there is at least one phone on the premises? Will the small DP and/or LSE be required to monitor its communication system 24/7 with competent personnel for an unlikely TOP/BA directive?
No
To demonstrate compliance the small Registered Entities will be in the position of proving a negative: i.e., there is no real-time BES operational communication from or to any other entity. Currently, for the smaller entities, communication with the Transmission Operator or Balancing Authority is strictly for operational safety and local reliability of service, not operational reliability for the BES as defined by NERC. It is not clear how the small entity will show compliance. If R4 requires the small load-only DP and/or LSE to have 24/7 monitoring of its phone, and contracted answering service is unable to contact anyone, will this be a violation?
No
With the vague verbiage of R4 coupled with the High and Severe VSL, it is important to clarify R4 with the small DP in mind, and possibly include Lower and Moderate VSLs for smaller load-only DP violations.
No
It would be advantageous to exempt certain smaller Registered Entities (LSE, DP, & PSE) that are non-scheduling/tagging entities. In addition to not having a scheduling/tagging desk, many of these entities do not have a 24/7 desk to receive RC/BA/TOP reliability directives/calls. and are too small (10s of MW) to even be substantially

significant in a reliability crisis. Instead of making this Standard applicable to all DPs, LSEs, and PSEs, we suggest that the RC, BAs, and TOPs to yearly publish those LSEs, DPs, and PSEs responsible for responding to emergency reliability directives. Also, it would be advisable for the RC, BA, and TOP giving a reliability directive to clearly preface the instruction with "The following is an emergency reliability directive" to differentiate from normal operations communications. Many smaller entities do not have the resources to install reliable voice recording equipment, but having access to such recordings would be beneficial towards compliance documentation; thus, it would be helpful to require the directive issuing RC, BA, or TOP to provide a digital copy of the voice recording, or transcript if available on request to the recipient of the directive. Short of a recording or transcript of the recording, it will be difficult to determine how a small entity without recorded line would show compliance other than writing down the directive as it is given and reading it back to the issuer. If the directive is lengthy, this will slow down the process and probably defeat the purpose and value of quick action. Further, there is no guarantee that the receiver will accurately retain a complicated directive if not immediately documented in some way to allow review. Last of all, what is meant by the word "intent?" Must the recipient understand and demonstrate the "why" the directive is given and the intended "outcome," or merely paraphrase the directive to demonstrate understanding? If the recipient repeats word for word the directive back to the issuer without any other indication that the directive is understood, is this a violation??

No

Only in making the Measures agree with the suggested changes to the requirements above.

No

Only in making the Measures agree with the suggested changes to the requirements above.

Yes

No

To reduce the compliance burden on smaller entities that would never receive a Reliability Coordinator directive and reduce needless Regional Entity auditing, it would be most helpful to require the RC to publish its list of entities responsible for receiving reliability directives. Also, any Registered Entity should be able to request copies of digital audio recordings or transcripts of the audio recordings if available from the RC.

No

Only in making the Measures agree with the suggested changes to the requirements above.

No

Only in making the Measures agree with the suggested changes to the requirements above.

Abstain

Abstain

Abstain

Group

WECC Reliability Coordinator

Mike Davis

WECC RC

Yes

Yes

Yes

Yes

Yes

Yes

Yes

Yes

voice recordings or transcripts of voice recordings, electronic communications, or equivalent, of agreement shall be provided to explain the use of the alternate language. (R3.) M3 allows a language other than English. Must the agreement for non-English be in place in advance of the call?
No
see M3 comment for question 2
No
Support the intent but not the existing language. Do not support Requirements that include some examples since the examples can be confused with the Requirement. Do not support one written Requirement that has two requirements. Recommend the following Requirements A new R1 - Each Entity shall have Operational Procedure requiring that communications directives be repeated back to the issuer R2 – leave as is A new R3 – If not repeated, then issuer shall request the receiving Entity to repeat the communication directive A new R4 – The issuer will acknowledge the correctness of the repetition of the communications directive
No
Addressed the new proposed Requirements above in Question 4.
No
Address the new proposed Requirements.
No
Remove the word “outages” that appears after “cascading” as per NERC Glossary and FERC Directive issued Dec. 27, 2007.
No
Add “an issued” to the wording as shown following: The Each Transmission Operator, Balancing Authority, Generator Operator, Transmission Service Provider, Load-Serving Entity, Distribution Provider, and/or Purchasing-Selling Entity shall immediately confirm the ability to comply with the directive or inform the its Reliability Coordinator upon recognition of itshe inability to perform thean issued directive.
Yes
No
(i) R4: Since failing to issue an alert to 3 entities already attracts a “High” VSL, not doing so for ANY (i.e. failing to issue an alert to all entities) or more than three should attract a “Severe” VSL. We suggest to change the High VSL to: “...failed to issue an alert to three, but not all, impacted...” and the Severe VSL to: “...failed to issue an alert to any or more than three impacted Transmission Operators and Balancing Authorities in its Reliability Coordinator Area. Some examples may help to make our intent clearer: If there were 3 BAs, TOPs etc. and none were alerted, this would be a “Severe” violation. If there were 6 BAs, TOPs etc. and 3 were not alerted, this would be a “High” violation. In this last case, if 4 BAs, TOPs etc. were not alerted, this would be a “Severe” violation. (ii) R5: Similar changes as in R4 should also apply to High and Severe in R5.
No
The intents of Requirements R7 and R8 are addressed in R6, and do not add anything. Suggest removing R7 and R8.
No
The intents of Measures M7 and M8 are addressed in M6, and do not add anything. Suggest removing M7 and M8.
No
(i) Arguably, all four VSLs could be developed as opposed to just having the Moderate and Severe, if the VSLs are graded according to the number of impacted RCs that need to be notified. For example, Low for missing one, Moderate for missing two, High for missing three, Severe for missing four or more. (ii) We do not have any issue with the binary nature of the VSLs for R6, R7 and R8, but they may need to be revised (wording change and/or removal) depending on the SDT’s response to our comments under Q11.
NPCC appreciates the work of the Drafting Team. No additional comments.
Individual
Brent Hebert
Calpine Corporation
Yes
Yes
Yes
Yes
Calpine supports three part communications when verbal directives are issued during real-time operational emergency conditions. Calpine believes all issued directives should be explicitly identified as such.

Group
Southern Company
Hugh Francis
Southern Company Services, Inc.
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes
No
IRO-001-1 Requirement 3 states that, "The Reliability Coordinator shall have clear decision-making authority to act and to direct actions to be taken by Transmission Operators, Balancing Authorities, Generator Operators, Transmission Service Providers, Load-Serving Entities, and Purchasing- Selling Entities within its Reliability Coordinator Area to preserve the integrity and and reliability of the Bulk Electric System." This does not give one RC the authority to direct another RC. Requirement 7 and 8 would allow one RC to give a directive to another RC if they disagree. This would allow an RC with bad information to require another RC to carry out a mitigation plan that could degrade system reliability. For example, RC1 identifies a possible SOL violation in RC2's reliability area due to RC1's generation pattern. RC1 and RC2 can't agree that there is a problem. In order to mitigate the SOL a mitigation plan is developed by RC1 that requires RC2 to redispatch generation and reconfigure transmission in RC2's area so that the generation and transmission in RC1's area won't have to be redispatched or reconfigured. Suggested rewording of R7 and R8 R7. When Reliability Coordinators can not agree that a problem exists a mitigation plan will be developed by each Reliability Coordinator that will restore system reliability in their respective reliability areas. [Violation Risk Factor: Medium][Time Horizon: Operations Planning, Same Day Operations and Real-time Operations] R8. Each impacted Reliability Coordinator shall implement the mitigation plan developed to relieve the identified Adverse Reliability Impact in their reliability area when the impacted Reliability Coordinators can not agree that a problem exists. [Violation Risk Factor: Medium][Time Horizon: Operations Planning, Same Day Operations and Real-time Operations]
Yes
No
Reliability problems identified in other reliability areas are based on modeling information obtained from another reliability region. The fact that one RC will not agree that the model of an adjacent RC's reliability area may be more accurate than their model of the adjacent reliability area is no reason to impose a severe violation on the RC with the more accurate model of their own reliability region. Example: RC1 identifies a contingency overload of a transformer bank in an adjacent reliability area. The transformer bank was replaced the week before with a larger bank. When RC1 contacts RC2, RC2 explains that the bank overload is not valid because of the replacement. RC2 does not identify a problem due to the fact that the model RC2 is using has been updated with the new transformer bank. RC1 will not agree and requires RC2 to open a tie line with another reliability area to relieve the contingency overload. If RC2 does not follow the instructions of RC1, making the interconnection weaker to relieve a problem that does not exists, RC2 is out of compliance and a severe violation will be imposed.
Individual
Rao Somayajula

ReliabilityFirst Corporation
No
FERC 693 excludes distribution providers if they are not a user, owner or operator of BES. This should be reflected in R4 of the standard
No
No measures are posted for R4 of the revised standard
Yes
No
FERC 693 excludes distribution providers if they are not a user, owner or operator of BES. This should be reflected in R2 of the standard
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Individual
James H. Sorrels, Jr.
American Electric Power
Yes
AEP does generally agree with the revisions, but the use of the term "interpersonal communication capabilities" needs a NERC-approved definition. Otherwise, what is in scope? Are e-mail or text messages acceptable, and, if so, what type of guaranteed delivery is necessary?
Yes
Yes
Yes
AEP does generally agree with the revisions, but we have concerns with the much wider scope of three part communications that expand the required voice or transcript evidence. There is no rationale provided for changing the text in R1 and M1, and adding a the new R2 and M2. We would recommend that these items remain as stated in Version 2.
Yes
As described in the question 4 response, there is no rationale provided for changing the text in R1 and M1, and adding a the new R2 and M2. We would recommend that these items remain as stated in Version 2.
No
AEP is concerned that the severe VSL assigned to Requirement 2 is excessive and should be reconsidered.
Yes
Yes

Yes
Yes
Not applicable.
Not applicable.
Not applicable.
Group
SERC OC Standards Review Group
Jim Case
Entergy
No
The STD should clarify what types of communications are considered in the standard – is it voice or data communications or both?
Yes
Yes
No
The term “emergency” has a broad definition and other standards use “adverse conditions” or “adverse reliability impact”. There should be a consistency of terms when describing a system condition. The STD should include a definition of “directive” that includes more than “Emergency’ operational conditions. Should this requirement be modified to include the term “Reliability Directive” and the definition of this term added to the NERC Glossary?
Yes
Yes
If R1 changes as suggested in Question 4, the VSLs will need to be changed also.
No
What is the difference between “Adverse Reliability Impacts” and the definition of an IROL? Is this going to replace an IROL?
No
If R2 of IRO-001-1 is retired, what process is in place to ensure that reliability plans are kept up to date and are reviewed to approve footprint changes?
No
The measures should indicate how long records should be kept to verify compliance with the requirements.
Yes
No
Does the STD intend to give a Reliability Coordinator the authority to direct reliability outside their reliability area? This appears to be in conflict with IRO-001.
Yes
Yes
“The comments expressed herein represent a consensus of the views of the above named members of the SERC OC Standards Review group only and should not be construed as the position of SERC Reliability Corporation, its board or its officers.”
Group
Bonneville Power Administration
Denise Koehn
BPA Transmission Reliability Program
Yes

No
Issue #1: Measure M3 The measure states that entities "shall have and provide" evidence that "personnel used English as the language for all" communications. This infers that all communications must be documented in some form or fashion and that any outage of the normal communication system must be met with alternative processes which will meet this measure, even if the alternative is the preparation of handwritten notes of each person's conversations, noting that the communications occurred in English. Unfortunately, there have been times where our Dictaphone stopped recording phone calls, and nobody knew it for days! This measure sets us up for a violation! It's just a matter of time.
Yes
Yes
Yes
No
Comments: Issue #1: Violation Severity Level The Moderate and Severe VSLs for Requirement R1 can lead to confusion. For instance, the Moderate VSL states that the responsible entity 'did not acknowledge the recipient was correct in the repeated directive OR (emphasis theirs) failed to repeat the intent of the original statement to resolve any misunderstandings.' What is it saying here? Is it dinging the responsible entity for making no response at all to the recipient after they repeated the intent of the message? Or is that what the Severe VSL is dinging for when it includes an AND rather than an OR in the statement? I can't tell what the drafting team was intending with their statements, but one of the statements seem to infer that the responsible entity can actually be dinged for not doing both, acknowledging the recipient as being correct in their response and at the very same time repeating the intent of the original statement to resolve any misunderstandings because the recipient was incorrect in their response. This then argues that the recipient can be both correct and incorrect at the same time. I didn't think that was possible...similar to binary code...either you get a one or a zero, but not both and never neither! I would argue that the drafting team should rewrite their VSLs to succinctly state that the responsible entity failed to respond after the recipient repeated the intent of the message. With that in mind, either the Moderate or the Severe VSL will be rewritten in an understandable way and the other VSL will disappear in the realms of impossible things.
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Issue #2: Data Retention Why would the Distribution Provider and Generator Operator be required to store historical data (three years in the case of Requirement R1 and Measure M1; twelve months in the case of Requirement R2 and Measure M2) to show that these requirements and measures have been successfully implemented when these two entities (Distribution Provider and Generator Operator) aren't even included either in Requirements R1 and R2 or in Measure M1 and M2? It would appear that they should only have to provide historical data for three months as required by the data retention time for Requirement 3 and Measure 3. Issue #1: Data Retention The first bullet in this section states that all entities are responsible for retaining documents associated with all Requirements and Measures associated with this standard. In reality, Requirements R1, R4, R5 and R6 and the corresponding Measures are the responsibility of the Reliability Coordinator. Requirements R2 and R3 and their corresponding Measures are implemented by the Transmission Operator, Balancing Authority, Generator Operator, Distribution Provider, Transmission Service Provider, Purchasing-Selling Entity and the Load Serving Entity. The Data Retention section should be rewritten to reflect this so that entities are not required to maintain documents that they aren't suppose to even possess in some cases.
Individual
Brent ingebrihtson
E.ON U.S.

No
E.ON U.S. suggests deleting "interpersonal" from the term "interpersonal communications capabilities". The need for and meaning of the term "interpersonal" isn't clear. Does it infer communications must be to/from a specific individual rather than to/from another reliability entity? Verbal vs electronic communications? All non-data communications? E.ON U.S. believes that the term "interpersonal" must be clarified if it is to remain in the standard. In the proposed R1 – how extensive must the quarterly testing be – establish contact or verify all functions? Does the term "alternative" include the "normal" communication medium or only the "backup" mediums? Does the alternative imply ALL possible communication alternatives? E.ON U.S. suggests replacing the term "alternative" with "planned backup" or similar. Quarterly testing needs to be limited to only established/planned backup communication methods not any potential "alternative" communication method.
No
E.ON U.S. believes that the M1 must be clarified to address whether the testing entity is responsible to develop and implement a mitigation plan when a test is unsuccessful due to an issue at the other end (i.e. non-testing entity).
No
E.ON U.S. suggests that R1 be modified to include the language that when an RC, BA and/or TOP issue a directive it must state: "This is a directive" and the entity receiving the directive must state: "I understand this is a directive". E.ON U.S. also requests that language be added to the requirement that states that this communication protocol is only for reliability related directives and not for other operational directives.
No
E.ON U.S. suggests that the VSL for R4 should be binary with the Severe VSL for failing to notify all entities as per R4. Partially meeting R4 is not consistent with the language in R4. E.ON U.S. also suggests that the VSL for R5 should be binary with the Severe VSL for failing to notify all entities as per R5. Partially meeting R5 is not consistent with the language in R5 but the reliability impact of partially meeting R5 is low.
COM-001-2 R1 and R2 and the associated M1 and M2 are only applicable to the RC, TOP and BA but the "Data Retention" for R1/R2 and M1/M2 require the DP and GOP to retain data for the Requirements and Measures. E.ON U.S. suggests that the requirement for data retention of the DP and GOP be eliminated from the standard.
Individual
Kasia Mihalchuk
Manitoba Hydro
No
do not believe a mitigation plan is necessary in R1. If the interpersonal communication capability fails during the quarterly test, the entity simply needs to fix it, document the fix and re-test. A mitigation plan is unnecessary as it would delay repairing the interpersonal communication capability. R2 assumed that the 30 minutes or longer in parenthesis is intended to describe the length of the outage. We think this would be clearer if the requirement were revised to: "Each Reliability Coordinator, Transmission Operator and Balancing Authority shall notify impacted entities within 60 minutes of the detection of a failure of its normal interpersonal communications capabilities lasting longer than 30 minutes." R3 is not necessary as it would be impossible to meet many other requirements if a common language such as English was not used. This requirement results in the waste of compliance resources managing and auditing documentation associated with it.
No
Conforming changes are required to the Measures based on the suggested modifications to the requirements in question 1.
No
Conforming changes are required to the VSLs based on the suggested modifications to the requirements in question 1. In addition, since R2 has a time component in the requirement four VSLs could be written based on the timeliness of the notification.
Yes
For the most part agree with the changes to the requirements and believe it goes a long way towards resolving the issue NERC has created recently with interpreting operating instructions as directives. This makes it clear that only directives that are required for operating emergencies require three way communication. The SDT could further support

resolution to this directive issue by developing a definition for directive. In requirement 1, I would use another word than "require". Consider using "request". An RC, BA, and TOP can't force the recipient of the directive to repeat it back. They can ask or request it be repeated back though.

Yes

For the most part agree with the measures with the exception that a conforming change needs to be made to M1 if the suggestion regarding "require" in Q4 is accepted.

No

If the suggestion regarding "require" in Q4 is accepted, conforming changes to the VSL need to made. Additionally, believe the Moderate and Severe VSLs are confusing based on repeating the language exactly in the requirement. In most cases, repeating the language of the requirement is best but we believe a deviation is warranted here. The intent of Moderate appears to be that the RC, TOP or BA did not acknowledge the repeat of the directive was correct and the repeat was correct. In the Severe, we believe the intent appears to be that the RC, TOP or BA did not acknowledge the repeat of the directive was correct but the repeat was incorrect. We agree that these distinctions make sense but offer the following changes to clarify the intent. Moderate VSL: The responsible entity issued a verbal directive associated with real-time operating emergency conditions and the recipient repeated the intent of the directive correctly, but the responsible entity did not acknowledge the recipient was correct. Severe VSL: The responsible entity issued a verbal directive associated with real-time operating emergency conditions and the recipient repeated the intent of the directive incorrectly, but the responsible entity failed to repeat the intent of the original statement to resolve any misunderstandings.

Yes

No

R5 does not make sense as it doesn't create an adverse reliability impact should the RC fail to notify impacted entities.

No

Measure for R5 would need to be struck should R5 be struck as per question 8.

No

Believe two VSLs are possible for R1 based on whether the RC is acting or directing actions to prevent versus mitigate. Failure to mitigate should be Severe. Failure to prevent should be High because if the RC fails to act or direct action to prevent, the Adverse Reliability Impact may still not happen if system conditions change. For the Moderate VSL of R2, please remove the clause "but not all". It is not necessary.

No

Requirements R2 and R8 need additional work. R2 appropriately requires the RC experiencing the Adverse Reliability Impact to distribute its Operating Procedure, Process or Plan to other RCs required to take action. However, it inappropriately places the burden on the same RC to obtain the agreement of impacted RCs. No RC can be forced to agree. Rather R2 should remove the bullet to require agreement from the impacted RC and a new requirement should be written to require the impacted RC to acknowledge the Operating Procedure, Process or Plan with agreement or disagreement. In the event of disagreement, a reliability or legal reason or failure to implement comparable actions should be given as the reason for not agreeing with the Operating Process, Procedure or Plan. This contributes to reliability by forcing the impacted RC to take action if the action is reasonable. Further, the drafting team needs to clarify that R2 also applies to the mitigation plan in R7. Because R7 requires the RC experiencing the Adverse Reliability Impact to develop the mitigation plan, the mitigation plan may not be agreed to by the impacted RC. The impacted RC may have a perfectly valid reliability, statutory, legal, or regulatory reason for not agreeing to the mitigation plan. R8 still obligates the RC to implement the mitigation plan developed in R7 though it may be contrary to reliability. R8 needs to allow the RC to refuse to implement the mitigation plan if the impacted RC has a reliability, statutory, legal or regulatory reason. Further the drafting team should consider if the impacted RC could refuse because the RC experiencing the Adverse Reliability Impact has not implemented comparable measures in their own area. R8 as written could allow an RC to simply pass cost on to the neighboring RC in the name of reliability. For example, the RC may not want to order a unit to be committed to avoid certain startup costs but they ask the neighboring RC to start up a unit in their footprint.

No

Conforming changes to the Measurements will be required for accepted changes from question 11.

No

Believe that four VSLs could be written for R4 based on the number of conference calls that are participated in. Four VSLs should be written for R5 based on the number of RCs notified. Furthermore, the current Severe VSL is redundant with the Moderate VSL. Failure to notify one RC meets both VSL since Severe uses the word any.

Individual

Troy Willis

Georgia Transmission Corporation

No

Per the NERC Reliability Standards Development Procedure, under the definition of a Reliability Standard; "The obligations or requirements must be material to reliability and measurable." With regards to R3. - It goes without saying that inter-entity BES reliability communications must be in a common language between the entities for understanding operation instructions. From an audit/measurability standpoint, the evidence to the requirement would not converge to a finite amount of material. The amount of evidence required to demonstrate compliance of this requirement would be a huge administrative burden. It seems this concept (for use of the English language) could be captured under the "Entity Tasks and Interrelationships" section of the NERC Reliability Functional Model which defines the set of functions that must be performed to ensure the reliability of the bulk electric system. It also explains the relationship between and among the entities responsible for performing the tasks within each function. Additionally, this concept (for use of the English language) could further be explained under each applicable registration type (BA, GOP, TSP, LSE, PSE, and DP) in the NERC Reliability Functional Model. The Second option for R3 is to remove the Requirement from the continent wide Standards and have the effected entities/regions create a "Regional Standard" where entities involved in inter-entity BES reliability communications have a history of language barrier concerns. As a separate issue to R3, it also seems conflicting that a written requirement would provide the option of "Unless agreed to otherwise". This option described in the language of the requirement implies that it is not a requirement but an option which further supports the suggestions above.

No

See comments to Question 1 in regards to measurability.

No

Again, Requirement 3 seems to be an option.

Yes

Yes

Yes

Yes

Yes

Yes

Yes

N/A

N/A

N/A

Individual

Bob Thomas

Illinois Municipal Electric Agency

No

The IMEA supports comments submitted by the MISO Standards Collaboration Group indicating R3 is not necessary. Similarly, IMEA questions the necessity of R4. Therefore, we question the need to expand the applicability of COM-001 to DP, LSE, and PSE since R3 and R4 are the only two Requirements applicable to those functions.

No

Conforming changes are required to the Measures based on the suggested modifications to the requirements in Question 1.

No

Conforming changes are required to the VSLs based on the suggested modifications to the requirements in Question 1.

No

IMEA questions the necessity of expanding the applicability of COM-002 as proposed in R2, particularly to the DP, LSE, and PSE functions. IMEA recommends accomplishing the intent of COM-002-3 R2 by simply referring to COM-002-3 R1 in IRO-001-2 R2 which requires those entities to comply with the RC directive. Thus it would be understood that the functional entity had repeated the directive in order to comply with it; thereby avoiding the necessity of expanding applicability to another reliability standard.

Conforming changes are required to the Measures based on the suggested modifications to the requirements in

interpersonal communications capabilities that lasts 30 minutes or longer."
Yes
However, it is not clear whether to show compliance the voice recordings and associated transcripts are of the test done or of the conversations across those facilities.
Yes
Yes
1. We agree with the clarification in R1 that a directive per COM-002-3 is a "verbal directive associated with real-time operational emergency conditions". We understand this to be a "Reliability" directive used during times of emergency or in situations where reliability may be an issue. Also, with this clarification, it confirms that the term "directive", as used in this standard, does not include "Operational" directives issued by System Operators during normal system conditions to change the status of an element such as a circuit breaker. 2. The industry does not appear to have a clear, consistent definition of what constitutes a directive. We suggest the standard require the person issuing a directive to use the phrase "I am directing you to ...", "I am ordering you to ..." or something similar to invoke the three part communication requirement. 3. Since this standard deals with communications and coordination during emergency conditions, it may be helpful to change the title of the standard to "Communications and Coordination – Emergency Conditions". 4. The phrase "the intent of the directive" could be difficult to comply with and measure. The words "the intent of" should be removed from Requirements R1 and R2.
Yes
Yes
Yes
If the term "cascading" used in the definition is referring to the NERC-defined term, it should be capitalized.
No
Regarding the retirement of IRO-001-1 R7 – We are not convinced that this requirement is redundant with IRO-014-1 R1. The existing requirement requires the RC to "have clear, comprehensive coordination agreements with adjacent RCs to ensure that SOL or IROL violation mitigation requiring actions in adjacent RC areas are coordinated". IRO-014-1 R1 requires agreements for coordination of actions between RCs to support Interconnection reliability, but it does not specifically require "clear" and "comprehensive" agreements to mitigate SOL or IROL violations. For IRO-001-1 R7 to be properly retired, the "mitigation of SOL and IROL violations" should be explicitly stated in IRO-014-2 R1 as one of the items to be addressed in the RC's Operating Procedure, Process, or Plan.
Yes
Yes
No
See our comments from Questions 8. If IRO-001 R7 is retired and deemed covered by IRO-014 R1, then IRO-014 R1 should include the "mitigation of SOL and IROL violations" as one of the items to be addressed in the RC's Operating Procedure, Process, or Plan.
Yes
Yes
Individual
Roger Champagne
Hydro-Québec TransÉnergie (HQT)
No
Interpersonal communication includes more than voice, such as instant messaging, text messaging and email. This Standard needs a definition of interpersonal communication. Having alternative interpersonal communications should be specified as a requirement since there is actually no requirement to have that alternative way of communication in the first place. Work communication within Québec must be in French according to the law. It is understood and agreed that communication outside Québec with adjacent entities would be, and is in fact already, in English. Accordingly, R3 should be modify as the proposition below: R3. Unless determined by law or otherwise agreed to, ...
No
Comments: See our comment for R3 in Q1. Accordingly, M3 should be modify to read as the proposition below: M3. ... that will be used to determine that personnel used English «or another language determine otherwise» as the language

for all inter-entity Bulk Electric System reliability communications between and among operating personnel responsible for the real-time generation control and operation of the interconnected Bulk Electric System. If a language other than English is used, upon request, evidence shall be provided to explain the use of the alternate language. (R3.) M3 allows a language other than English. Must the agreement for non-English be in place in advance of the call?

No

see M3 comment for question 2

No

Support the intent but not the existing language. Do not support Requirements that include some examples since the examples can be confused with the Requirement. Do not support one written Requirement that has two requirements. Recommend the following Requirements A new R1 - Each Entity shall have Operational Procedure requiring that communications directives be repeated back to the issuer R2 – leave as is A new R3 – If not repeated, then issuer shall request the receiving Entity to repeat the communication directive A new R4 – The issuer will acknowledge the correctness of the repetition of the communications directive

No

Address the new proposed Requirements above in Question 4.

No

address the new proposed Requirements.

No

Remove the word “outages” that appears after “cascading” as per NERC Glossary and FERC Directive issued Dec. 27, 2007.

No

Add “an issued” to the wording as shown following: Each Transmission Operator, Balancing Authority, Generator Operator, Transmission Service Provider, Load-Serving Entity, Distribution Provider, and Purchasing-Selling Entity shall inform its Reliability Coordinator upon recognition of its inability to perform «an issued» directive.

Yes

No

(i) R4: Since failing to issue an alert to 3 entities already attracts a “High” VSL, not doing so for ANY (i.e. failing to issue an alert to all entities) or more than three should attract a “Severe” VSL. We suggest to change the High VSL to: “...failed to issue an alert to three, but not all, impacted...” and the Severe VSL to: “...failed to issue an alert to any or more than three impacted Transmission Operators and Balancing Authorities in its Reliability Coordinator Area. Some examples may help to make our intent clearer: If there were 3 BAs, TOPs etc. and none were alerted, this would be a “Severe” violation. If there were 6 BAs, TOPs etc. and 3 were not alerted, this would be a “High” violation. In this last case, if 4 BAs, TOPs etc. were not alerted, this would be a “Severe” violation. (ii) R5: Similar changes as in R4 should also apply to High and Severe in R5.

No

The intents of Requirements R7 and R8 are addressed in R6, and do not add anything. Suggest removing R7 and R8.

No

The intents of Measures M7 and M8 are addressed in M6, and do not add anything. Suggest removing M7 and M8.

No

(i) Arguably, all four VSLs could be developed as opposed to just having the Moderate and Severe, if the VSLs are graded according to the number of impacted RCs that need to be notified. For example, Low for missing one, Moderate for missing two, High for missing three, Severe for missing four or more. (ii) We do not have any issue with the binary nature of the VSLs for R6, R7 and R8, but they may need to be revised (wording change and/or removal) depending on the SDT’s response to our comments under Q11.

Individual

Scott Berry

Indiana Municipal Power Agency

No

The requirements do not consider a pre-recorded communication that might be sent out from the Transmission Operator to Generator Operators or any other entity. If this communication is a directive associated with a real-time operational emergency condition (depending on the judgement used by an entity or auditor), it does not make sense to repeat back a pre-recorded message on the phone. It might be good to clearly state in the standard that pre-recorded messages do not need to be repeated back.

Individual
Greg Rowland
Duke Energy
No
R1 requires an entity to “develop a mitigation plan” if a test of alternative communications capabilities is unsuccessful. We believe that this phrase should be changed to “take action”, reflecting that an entity’s response to an unsuccessful test may be to simply call or email a repair order. The phrase “develop a mitigation plan” implies that an entity must establish a backup to the alternative communications capabilities rather than just restore the alternative communications capabilities.
No
Replace the phrase “develop a mitigation plan” with the phrase “take action” per our comment on Requirement R1 above. Also, the DP and GOP should be deleted from the Data Retention section requirements for R1/M1 and R2/M2. Need to add a Data Retention requirement for R4/M4 for the DP and GOP.
No
Replace the phrase “develop a mitigation plan” with the phrase “take action to restore the capabilities” per our comment on Requirement R1 above.
No
We agree with adding the clarification that these requirements refer to “emergency” communications, but we think the word “Emergency” should be capitalized to further clarify that it is a defined term in the NERC Glossary. Also, the phrase “require the recipient of the verbal directive to repeat the intent of the directive back” should be changed to “have the recipient of the verbal directive repeat the intent of the directive back”. This avoids making the issuer of the directive make a statement requiring a repeat back unless the recipient actually fails to repeat back as normally expected.
No
Change “emergency” to “Emergency” per comment on R1 above. Also change the phrase “required the recipient of the verbal directive to repeat” to “had the recipient of the verbal directive repeat” per our comment on R1 above.
No
Change “emergency” to “Emergency” in the VSLs per our comment on R1 above. Also, we don’t see a tangible difference between the Moderate and Severe VSLs, and the High VSL should really be the Severe VSL. We suggest having just a High and a Severe VSL as follows: • High VSL: “The responsible entity issued a verbal directive associated with real-time operating Emergency conditions and had the recipient repeat back the intent of the directive, but did not either acknowledge the recipient was correct in the repeated directive or failed to repeat the intent of the original statement to resolve any misunderstandings.” • Severe VSL: “The responsible entity issued a verbal directive associated with real-time operating Emergency conditions, but did not have the recipient repeat back the intent of the directive.”
Yes
Yes
Yes
Yes
No
• R1 introduces the concept of “impacted Reliability Coordinators” which is unclear. Revise R1 as follows: R1. For conditions or activities that may impact other Reliability Coordinator Areas, each Reliability Coordinator shall have Operating Procedures, Processes, or Plans for notification, exchange of information or coordination of actions with

those impacted Reliability Coordinators to support Interconnection reliability. These Operating Procedures, Processes, or Plans shall collectively address the following: • R2 Time Horizon should not include Long-term Planning. • R3 is unclear. Revise R3 as follows: R3. For conditions or activities that may impact other Reliability Coordinator Areas, each Reliability Coordinator shall make notifications and exchange reliability-related information with those impacted Reliability Coordinators using its predefined Operating Procedures, Processes, or Plans, or other available means to accomplish the notifications and exchange of reliability-related information. • R4 could be interpreted to require a weekly conference call even if there is no need for a call. Revise R4 as follows: R4. When there are conditions or activities that may impact other Reliability Coordinator areas, each Reliability coordinator shall participate in agreed upon conference calls, at least weekly, and other communication forums with those impacted Reliability Coordinators. • R5 – Insert the word “all” before impacted Reliability Coordinators for clarity. • R6, R7 and R8 are interrelated and unclear. Combine these three requirements into one clear requirement as follows: R6. When the identified Adverse Reliability Impact cannot be agreed to by the impacted Reliability Coordinators, the Reliability Coordinator with the identified Adverse Reliability Impact shall develop a mitigation plan and each impacted Reliability Coordinator shall implement the plan.

No

Need to revise the Measures to coincide with the recommended changes to the requirements in #11 above. Also under Data Retention, 12 months of evidence is needed for R3, R4 and M3, M4. However 3 years plus the current year is required for R5 through R8 and M5 through M8. We see no reason the data requirements to be different and believe 12 months is the proper amount of data retention.

No

Need to revise the VSLs to coincide with recommended changes to the requirements in #11 above.

Individual

Jianmei Chai

Consumers Energy Company

No

COM-002 R2 specifies the Generator Operator that receives a directive from the Transmission Operator, Reliability Coordinator or Balancing Authority must repeat the intent of the directive back to the Transmission Operator. COM-002 M2 specifies that evidence must be retained in the form of either voice recordings or transcripts by the generator operator. Since the Transmission Operator, Reliability Coordinator and Balancing Authority already have voice recording capability (centrally located), it is not necessary for the Generator to also install voice recording capability at each generating station. We suggest the wording of COM-002 be changed such that only the Transmission Operator, Reliability Coordinator and Balancing Authority be required to keep voice recordings or transcripts.

Group

IRC Standards Review Committee

Ben Li

IESO

No

(1) We do not believe a mitigation plan is necessary in R1. If the interpersonal communication capability fails during the quarterly test, the entity simply needs to fix it, document the fix and re-test. A mitigation plan is unnecessary and will only delay repairing the interpersonal communication capability as it would have to be completed first before fixing the system. If repairing the system would be a lengthy process, then a mitigation plan may be developed to document that the entity is in process to fix the system. There is no associated requirement to have an alternate interpersonal communication capability along with R1 to test it. Thus, if a responsible entity did not have an alternate interpersonal communication capability. R1. in essence. does not apply. We suggest adding a requirement to have an alternate

interpersonal communication capability to address this gap. Alternatively, the requirement to have an alternate interpersonal communication capability along with requirements to test and fix it could be stipulated in the Organization Certification Requirements. (2) In R2, we assume that the 30 minutes or longer in parenthesis is intended to describe the length of the outage. We think this would be clearer if the requirement were revised to: "Each Reliability Coordinator, Transmission Operator and Balancing Authority shall notify impacted entities within 60 minutes of the detection of a failure of its normal interpersonal communications capabilities lasting longer than 30 minutes." (3) R3 is not necessary. This requirement results in the waste of compliance resources managing and auditing documentation associated with it with no measurable improvement to reliability.

No

Conforming changes are required to the Measures based on the suggested modifications to the requirements in question 1.

No

(1) Conforming changes are required to the VSLs based on the suggested modifications to the requirements in question 1. (2) FERC expressed its desire in the June 2008 order on VSLs to have as many VSLs as possible. We suggest since R2 also has a time component in the requirement four VSLs could be written based on the timeliness of the notification as well as the number of impacted entities that were not notified. The VSLs should reflect both components.

Yes

(1) We largely agree with the changes to the requirements and believe it goes a long way towards resolving the issue NERC has created recently with interpreting operating instructions as Reliability Directives. This makes it clear that only Reliability Directives that are required for operating emergencies require three way communication. We believe that the SDT could further support resolution to this Reliability Directive issue by developing a definition for Reliability Directive. We propose the following definition: Reliability Directive – A verbal communication by a Reliability Coordinator, Transmission Operator, or Balancing Authority that requires action by the recipient to prevent or mitigate an Adverse Reliability Impact. Please note that AESO already has this term defined. The above suggested definition may be different from the AESO's definition. (2) In requirement 1, we do believe that another word than "require" should be used. Consider using "request". An RC, BA, and TOP can't force the recipient of the Reliability Directive to repeat it back. They can ask or request it be repeated back though.

Yes

We largely agree with the measures with the exception that a conforming change needs to be made to M1 if the suggestion regarding "require" in Q4 is accepted.

No

If the suggestion regarding "require" in Q4 is accepted, conforming changes to the VSL need to be made. Additionally, we believe the Moderate and Severe VSLs are confusing based on repeating the language exactly in the requirement. In most cases, repeating the language of the requirement is best but we believe a deviation is warranted here. The intent of Moderate appears to be that the RC, TOP or BA did not acknowledge the repeat of the Reliability Directive was correct and the repeat was correct. In the Severe, we believe the intent appears to be that the RC, TOP or BA did not acknowledge the repeat of the Reliability Directive was correct but the repeat was incorrect. We agree that these distinctions make sense but offer the following changes to clarify the intent. Moderate VSL: The responsible entity issued a verbal Reliability Directive associated with real-time operating emergency conditions and the recipient repeated the intent of the Reliability Directive correctly, but the responsible entity did not acknowledge the recipient was correct. Severe VSL: The responsible entity issued a verbal Reliability Directive associated with real-time operating emergency conditions and the recipient repeated the intent of the Reliability Directive incorrectly, but the responsible entity failed to repeat the intent of the original statement to resolve any misunderstandings.

Yes

The drafting team should consider that NERC is moving away from using the term "cascading outages". FERC has directed NERC to rescind this definition, and use the defined term "cascading" instead.

Yes

Yes

Yes

Yes

No

(1) R2 appropriately requires the RC experiencing the Adverse Reliability Impact to distribute its Operating Procedure, Process or Plan to other RCs required to take action. However, placing the burden on the same RC to obtain the agreement of impacted RCs may not be appropriate since the RC experiencing the Adverse Reliability Impact may not be able to force impacted RC to concur. We suggest the SDT to consider: a. Remove the bullet to require agreement from the impacted RC; b. Add a new requirement that the impacted RC shall acknowledge the Operating Procedure, Process or Plan with agreement or disagreement. In the event of disagreement, a reliability or legal reason or failure to implement comparable actions should be given. (2) We realize that R7 implies that the RC experiencing the Adverse Reliability Impact has come up with an alternative plan when its initial plan was not agreed to, but the alternative may still be disagreed by the impacted RC. Simply implementing the alternative plan, as stipulated in R8, could expose the

impacted RC to operate in an unreliable or unsafe domain. We therefore request the SDT to assess if any requirements need to be introduced to resolve this difference with due regard to reliability concerns in both RC areas when agreement cannot be reached even on the alternative plan.

No

Conforming changes to the Measurements will be required if changes as suggested in Question 11 are introduced.

No

(1) In the Commission's June 2008 order on VSLs, they expressed their preference for having as many VSLs as possible. We believe that four VSLs could be written for R4 based on the number of conference calls that are participated in. We also believe this would be consistent with the Commission's guideline 4 because the requirement is written in the plural, that is conference calls, so all conference calls must be considered in aggregate. Thus, failure to participate in more than one conference call does not represent distinct violations but a single violation. (2) Four VSLs should be written for R5 based on the number of RCs notified. Furthermore, the current Severe VSL is redundant with the Moderate VSL. Failure to notify one RC meets both VSL since Severe uses the word any. Note: CAISO abstains from these comments.

AESO abstains from commenting on VSLs. VSLs for Alberta will be developed by provincial authorities.

Individual

Michael R. Lombardi

Northeast Utilities

No

It is understood that the use of the term "interpersonal communications" and "interpersonal communications capabilities" were selected by the RC SDT to better reflect the intent of the Standard. However, NU reviewers are concerned over the new terminology and believe that it is unclear and not universally accepted to mean the same thing to all parties. NU's belief is that the original use of the terms "telecommunications" and "telecommunications facilities" are clearer and universally understood. NU recommends that the original terms be re-instated or the term "interpersonal communications" be replaced to reflect the intent of the Standard is to ensure "voice and text equipment" is adequate for communicating real-time operating information. R1 – the requirement has evolved to test alternative equipment, versus a requirement to have primary and alternative equipment. Standard should require entities to have the equipment such as in the -1 version. R2 is to notify impacted entities in the event of a loss of normal communications. With backup communications operating correctly do we assume there is no impact and therefore notification is not required? This is unclear from a compliance perspective and unnecessary if backup communications are available. Alternative communications often go several layers deep including cell phones, satellite phones, radio, etc.

Yes

Yes

Yes

No

NU agrees with expanding the applicability of the Standard beyond the Reliability Coordinators, Balancing Authorities and Transmission Operators to ensure that the recipient of a verbal directive repeats back the directive to the issuer (R2). Despite NU's agreement with R2, NU believes that M2 is duplicative to the intent of M1 and unnecessarily requires the installation of voice recording capabilities at the entities other than a RC, BA or TOP. It is our belief that the voice recordings of the RC, BA and TOP (M1) provide the evidentiary support required by all applicable entities.

Yes

No

Remove the word "outages" that appears after "cascading" as per NERC Glossary and FERC Directive issued Dec. 27, 2007.

No

The intent of R3 is not clear - i.e., "... shall inform its Reliability Coordinator upon recognition of its inability to perform a directive". Does this requirement pre-suppose a directive has been given? Suggest adding clarifying language that indicates that the requirement is applicable subsequent to a directive being received. It is our belief that the wording of Measure M3 supports the suggested changes to R3.

Yes

No

(i) R4: Since failing to issue an alert to 3 entities already attracts a "High" VSL, not doing so for ANY (i.e. failing to issue an alert to all entities) or more than three should attract a "Severe" VSL. We suggest to change the High VSL to:

<p>"...failed to issue an alert to three, but not all, impacted..." and the Severe VSL to: "...failed to issue an alert to any or more than three impacted Transmission Operators and Balancing Authorities in its Reliability Coordinator Area. Some examples may help to make our intent clearer: If there were 3 BAs, TOPs etc. and none were alerted, this would be a "Severe" violation. If there were 6 BAs, TOPs etc. and 3 were not alerted, this would be a "High" violation. In this last case, if 4 BAs, TOPs etc. were not alerted, this would be a "Severe" violation. (ii) R5: Similar changes as in R4 should also apply to High and Severe in R5.</p>
No
The intents of Requirements R7 and R8 are addressed in R6, and do not add anything. Suggest removing R7 and R8.
No
The intents of Measures M7 and M8 are addressed in M6, and do not add anything. Suggest removing M7 and M8.
No
(i) Arguably, all four VSLs could be developed as opposed to just having the Moderate and Severe, if the VSLs are graded according to the number of impacted RCs that need to be notified. For example, Low for missing one, Moderate for missing two, High for missing three, Severe for missing four or more. (ii) We do not have any issue with the binary nature of the VSLs for R6, R7 and R8, but they may need to be revised (wording change and/or removal) depending on the SDT's response to our comments under Q11.
Northeast Utilities appreciates the work of the Drafting Team. No additional comments.
Individual
Dan Rochester
Independent Electricity System Operator
No
We suggest the SDT review the applicability to Transmission Service Providers, Load-Serving Entities and Purchasing Entities from a real time operating perspective. We do not believe they are active participants in real time operation for which they require to have the same communication capability as the RCs, TOPs, BAs and DPs. Interpersonal communication includes more than voice, such as instant messaging, text messaging and email. This Standard needs a definition of interpersonal communication. Having alternative interpersonal communications should also be specified as a requirement. Work communication within Québec must be in French according to the law. It is understood and agreed that communication outside Québec with adjacent entities would be, and already is, in English. Accordingly, R3 should be modified as proposed below: R3. Unless dictated by law or otherwise agreed to, ... R4: We believe "Interconnection" should be replaced by "interconnection" since the former is not a defined term.
No
M3 and M4 may need to be revised depending on the response to our comments under Q1, above.
No
The VSLs for R3 may have to be changed based on the outcome of our comments in Q2 regarding the language of communication.
No
(i) We suggest the word "emergency" be capitalized since it is a defined term which generally covers the conditions under which directives are issued. (ii) We further suggest that to avoid confusion between operating instructions and directives, the term directive should be defined as suggested below: Directive or Reliability Directive – A verbal communication by a Reliability Coordinator, Transmission Operator, or Balancing Authority that requires complying action by the recipient to prevent or mitigate an Adverse Reliability Impact. (iii) Since R1 contains two requirements, there may be some benefit in separating these since that would make the VSLs clearer, i.e. separate the requirements placed on the issuer of the directive to (a) request the recipient to repeat the intent of the directive and (b) to acknowledge the response of the recipient as correct.
No
Comments: Some changes may be necessary based on the SDT's response to our suggestion in Q4.
No
The sequence of communication required under R1 is intended to ensure that directives from the issuing entities are clearly understood. The earlier this sequence is broken, the greater the uncertainty that this goal is achieved and the greater should be the severity level. Thus, failure to request that the recipient entity repeat the intent of the directive – the earliest step in the sequence - should attract the "Severe" VSL. Also, failing to repeat the original directive when there is any misunderstanding, again, in our view, leaves the intent of the directive equally unclear and should also attract a "Severe" VSL. Failing to acknowledge the recipient was correct in the repeating the intent of the directive – the last step in the sequence – is already assigned a "Moderate" VSL and this should not be repeated in the "Severe" VSL. We therefore suggest that the two conditions under "High" and "Severe" in R1 be combined as one under "Severe" as follows: The responsible entity issued a verbal directive associated with real-time operating emergency conditions but did not require the recipient to repeat the intent of the directive; OR The responsible entity issued a verbal directive associated with real-time operating emergency conditions and required the recipient to repeat the intent of the directive, but failed to repeat the intent of the original statement to resolve any misunderstandings.
No

Comments: Remove the word "outages" that appears after "cascading" as per NERC Glossary and FERC Directive issued Dec. 27, 2007.
No
Comments: Change "...inability to perform a directive." to "...inability to perform an issued directive."
Yes
No
(i) R1: For clarity, we suggest changing "it" to "that". R4: Since failing to issue an alert to 3 entities already attracts a "High" VSL, not doing so for ANY (i.e. failing to issue an alert to all entities) or more than three should attract a "Severe" VSL. We suggest to change the High VSL to: "...failed to issue an alert to three, but not all, impacted...." and the Severe VSL to: "...failed to issue an alert to any or more than three impacted Transmission Operators and Balancing Authorities in its Reliability Coordinator Area. Some examples may help to make our intent clearer: If there were 3 BAs, TOPs etc. and none were alerted, this would be a "Severe" violation. If there were 6 BAs, TOPs etc. and 3 were not alerted, this would be a "High" violation. In this last case, if 4 BAs, TOPs etc. were not alerted, this would be a "Severe" violation. (ii) R5: Similar changes as in R4 should also apply to High and Severe in R5.
No
(i) Definition of Adverse Reliability Impact is duplicated as it is already defined in IRO-001-2. (ii) We do not see the need for R7 and R8 since R6 already stipulates the necessary actions to be taken, it is not necessary for the Reliability Coordinator with the identified Adverse Reliability Impact to develop (re-develop?) a mitigation plan when the impacted Reliability Coordinators did not agree that the problem exists. What may be needed is the insertion of "shall develop a mitigation plan" before "notify impacted Reliability Coordinators" in R5. We suggest removing these requirements (R7 and R8).
No
Depending on the response of the SDT, changes to M5 to M8 may be required.
No
(i) Arguably, all four VSLs could be developed as opposed to just having the Moderate and Severe if the VSLs are graded according to then number of impacted RCs that need to be notified. For example, Low for missing one, Moderate for missing two, High for missing three, Severe for missing four or more. (ii) We do not have any issue with the binary nature of the VSLs for R6, R7 and R8, but they may need to be revised (wording change and/or removal) depending on the SDT's response to our comments under Q11.
In our comments on the previous posting, we expressed a disagreement with a proposed to remove IRO-005, in particular the latter part of R13, which stipulated that: In instances where there is a difference in derived limits, the Reliability Coordinator and its Transmission Operators, Balancing Authorities, Generator Operators, Transmission Service Providers, Load-Serving Entities, and Purchasing-Selling Entities shall always operate the Bulk Electric System to the most limiting parameter. Our rationale was that The FAC standards cover the methodology used in calculating SOLs and IROLs. Regardless of how these limits are calculated, in practice there always exists the possibility that different entities may come up with SOLs/IROLs, especially of the inter-ties, that could be different. Operating to the lowest SOLs/IROLs when more than one set exists is a necessary requirement for reliable operation. The SDT responded by suggesting that this requirement is redundant with FAC-014 which -014 states the requirement for developing and sharing SOL and IROL between the RC, PA, TP and TOP in both the planning and operating time frames. However, this response fails to address the situation where during operation, the situation of disagreeing SOLs or IROLs does arise. FAC-014 or any other standards do not currently have a requirement to ensure that all entities operate to the lower limit before the difference is resolved. This leaves room for unreliable operation. We suggest the SDT to consider restating this requirement somewhere. Note that this requirement is similar to R6 of IRO-014 that when in doubt, the more conservative approach should be taken. If it is necessary to have an R6 to deal with an uncertain identification/notification of an Adverse Reliability Impact, we don't see why it is not necessary to operate to a lower SOL or IROL when there is an unresolved difference.
Individual
Jason Shaver
American Transmission Company
No
We believe that the team needs to define the term "interpersonal communications capabilities". It's our understanding that the term refers to how entities will communicate (i.e. phone, cell phone, video conferencing, email or satellite phone) with each other, but that is not being clearly communicated by the requirement. A clear definition of the term "interpersonal communication capabilities" will likely provide needed clarity to the requirement. Requirement 1 seems to imply that an entity will be judge based on a single test of its alternative communication system within any given quarter, and if that test fails they must develop a mitigation plan. Our concern is that the requirement should allow for multiple testing and only if all or a reoccurring issue is found should you document and fix the issue. (Example: An entity performs weekly tests of its alternative communication system. One of the test's fails. All other tests, following the failed test, are successful. Would the entity have to develop a mitigation plan based on the one failure, or are the other successful tests sufficient to show compliance?) In R2, we assume that the 30 minutes or longer in parenthesis is

intended to describe the length of the outage. To clarify, we suggest that the language be changed to: "Each RC, TOP and BA shall notify impacted entities within 60 minutes of the detection of a failure of its normal interpersonal communication systems lasting longer than 30 minutes."
No
See our comment to question 1
No
are supportive of the language regarding "directives" which clarifies that directives are those which involve operating emergencies. However, in R1, we believe that the word "requires" should be changed to "request". An entity can request that another entity repeat back a directive but we cannot "require" it.
No
See our comments to question 4
Yes
Yes
Yes
Group
Midwest ISO Standards Collaborators
Jason L. Marshall
Midwest ISO
No
We do not believe a mitigation plan is necessary in R1. If the interpersonal communication capability fails during the quarterly test, the entity simply needs to fix it, document the fix and re-test. A mitigation plan is unnecessary and will only delay repairing the interpersonal communication capability as it would have to be completed first before fixing the system. In R2, we assume that the 30 minutes or longer in parenthesis is intended to describe the length of the outage. We think this would be clearer if the requirement were revised to: "Each Reliability Coordinator, Transmission Operator and Balancing Authority shall notify impacted entities within 60 minutes of the detection of a failure of its normal interpersonal communications capabilities lasting longer than 30 minutes." R3 is not necessary as it would be impossible to meet many other requirements if a common language such as English was not used. This requirement results in the waste of compliance resources managing and auditing documentation associated with it.
No
Conforming changes are required to the Measures based on the suggested modifications to the requirements in question 1.
No
Conforming changes are required to the VSLs based on the suggested modifications to the requirements in question 1. In addition, we suggest since R2 has a time component in the requirement, four VSLs could be written based on the timeliness of the notification. This would be consistent with the FERC's expressed desire in the June 2008 order on VSLs in which they stated that as many VSLs should be developed as possible.
Yes
We largely agree with the changes to the requirements and believe it goes a long way towards resolving the issue NERC has created recently with interpreting operating instructions as directives. This makes it clear that only directives that are required for operating emergencies require three way communication. We believe that the SDT could further support resolution to this directive issue by developing a definition for directive. We propose the following definition: Directive or Reliability Directive – A verbal communication by a Reliability Coordinator, Transmission Operator, or Balancing Authority that requires action by the recipient to prevent or mitigate an Adverse Reliability Impact. In requirement 1, we do believe that another word than "require" should be used. Consider using "request". An RC, BA, and TOP can't force the recipient of the directive to repeat it back. They can ask or request it be repeated back though.
Yes
We largely agree with the measures with the exception that a conforming change needs to be made to M1 if the

suggestion regarding "require" in Q4 is accepted.
No
If the suggestion regarding "require" in Q4 is accepted, conforming changes to the VSL need to made. Additionally, we believe the Moderate and Severe VSLs are confusing based on repeating the language exactly in the requirement. In most cases, repeating the language of the requirement is best but we believe a deviation is warranted here. The intent of Moderate appears to be that the RC, TOP or BA did not acknowledge the repeat of the directive was correct and the repeat was correct. In the Severe, we believe the intent appears to be that the RC, TOP or BA did not acknowledge the repeat of the directive was correct but the repeat was incorrect. We agree that these distinctions make sense but offer the following changes to clarify the intent. Moderate VSL: The responsible entity issued a verbal directive associated with real-time operating emergency conditions and the recipient repeated the intent of the directive correctly, but the responsible entity did not acknowledge the recipient was correct. Severe VSL: The responsible entity issued a verbal directive associated with real-time operating emergency conditions and the recipient repeated the intent of the directive incorrectly, but the responsible entity failed to repeat the intent of the original statement to resolve any misunderstandings.
Yes
No
We agree with many of the changes. However, we believe R5 is not necessary for reliability. We agree the RC should notify impacted entities when the transmission problem has been mitigated; however, if the RC fails to notify the impacted entities, it will not result in an Adverse Reliability Impact. Thus, it is not necessary as a sanctionable requirement.
No
Measurement 5 needs to be struck if R5 is struck per question 8.
No
The Commission stated in their order on VSLs in June of 2008 their preference for as many VSLs as possible. We believe two VSLs are possible for R1 based on whether the RC is acting or directing actions to prevent versus mitigate. Failure to mitigate should be Severe. Failure to prevent should be High because if the RC fails to act or direct action to prevent, the Adverse Reliability Impact may still not happen if system conditions change. For the Moderate VSL of R2, please remove the clause "but not all". It is not necessary.
No
Requirements R2 and R8 need additional work. R2 appropriately requires the RC experiencing the Adverse Reliability Impact to distribute its Operating Procedure, Process or Plan to other RCs required to take action. However, it inappropriately places the burden on the same RC to obtain the agreement of impacted RCs. No RC can be forced to agree. Rather R2 should remove the bullet to require agreement from the impacted RC and a new requirement should be written to require the impacted RC to acknowledge the Operating Procedure, Process or Plan with agreement or disagreement. In the event of disagreement, a reliability or legal reason or failure to implement comparable actions should be given as the reason for not agreeing with the Operating Process, Procedure or Plan. This contributes to reliability by forcing the impacted RC to take action if the action is reasonable. Further, the drafting team needs to clarify that R2 also applies to the mitigation plan in R7. Because R7 requires the RC experiencing the Adverse Reliability Impact to develop the mitigation plan, the mitigation plan may not be agreed to by the impacted RC. The impacted RC may have a perfectly valid reliability, statutory, legal, or regulatory reason for not agreeing to the mitigation plan. R8 still obligates the RC to implement the mitigation plan developed in R7 though it may be contrary to reliability. R8 needs to allow the RC to refuse to implement the mitigation plan if the impacted RC has a reliability, statutory, legal or regulatory reason. Further the drafting team should consider if the impacted RC could refuse because the RC experiencing the Adverse Reliability Impact has not implemented comparable measures in their own area. R8 as written could allow an RC to simply pass cost on to the neighboring RC in the name of reliability. For example, the RC may not want to order a unit to be committed to avoid certain startup costs but they ask the neighboring RC to start up a unit in their footprint.
No
Conforming changes to the Measurements will be required for accepted changes from question 11.
No
In the Commission's June 2008 order on VSLs, they expressed their preference for having as many VSLs as possible. We believe that four VSLs could be written for R4 based on the number of conference calls that are participated in. We also believe this would be consistent with the Commission's guideline 4 because the requirement is written in the plural, that is conference calls, so all conference calls must be considered in aggregate. Thus, failure to participate in more than one conference call does not represent distinct violations but a single violation. Four VSLs should be written for R5 based on the number of RCs notified. Furthermore, the current Severe VSL is redundant with the Moderate VSL. Failure to notify one RC meets both VSL since Severe uses the word any.