

## Consideration of Comments

### COM-002-2 — Communications and Coordination R2 for the ISO/RTO Council (Project 2009-22)

The COM-002-2 — Communications and Coordination R2 for the ISO/RTO Council Interpretation Drafting Team thanks all commenters who submitted comments on the proposed revisions (clean and redline) to the interpretation of COM-002-2 — Communications and Coordination R2 for the ISO/RTO Council (Project 2009-22) standard. These standards were posted for a 45-day public comment period from October 4, 2011 through November 18, 2011. Stakeholders were asked to provide feedback on the interpretation through a special electronic comment form. There were 34 sets of comments, including comments from more than 86 different people from approximately 63 companies representing all 10 of the Industry Segments as shown in the table on the following pages.

The majority of comments received indicated overall support for the Interpretation, indicating that the interpretation was about the meaning of the requirement and did not expand the reach of the standard. As such, the IDT did not make changes to the Interpretation.

Some minority comments suggested that the interpretation could lead to 3-part communication not being executed properly. The IDT respectfully disagrees with this assertion.

Some comments expressed concern that the Interpretation introduced the new terms “routine operating instructions” and “normal operations,” which are not defined and are used as a basis for the response to the request. The IDT notes that these terms were used by the requester in the Request for Interpretation, and were both appropriately used and within the scope of the IDT work.

Some comments expressed concern that the Interpretation actually restricts and or shrinks the reach of the Requirement and will have negative impacts on reliability if approved. The IDT disagrees with this assertion.

Some comments suggested the interpretation actually detracts from reliability. The IDT disagrees that reliability will be compromised.

A few comments stated that interpretation response regarding electronic communications from the first draft Interpretation posted for stakeholder comment should not have been removed, and suggested this topic be addressed in the Interpretation. The IDT continues to believe that this topic is outside the scope of the question asked in the Request for Interpretation, and therefore did not reinstate the language.

The IDT encouraged stakeholders to submit comments on active standards projects addressing related issues, such as Project 2007-02 (Operating Personnel Communications Protocols), Project 2007-03 (Real-time Operations), and Project 2006-06 (Reliability Coordination). Stakeholders may also submit a [suggestion form](#) to offer recommendations to address any concerns raised.

The IDT did not make any revisions to the interpretation based on the comments received.

All comments submitted may be reviewed in their original format on the standard's project page:  
[http://www.nerc.com/filez/standards/Project2009-22\\_RFI\\_COM-002-2\\_R2\\_IRC.html](http://www.nerc.com/filez/standards/Project2009-22_RFI_COM-002-2_R2_IRC.html)

If you feel that your comment has been overlooked, 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 of Standards and Training, Herb Schrayshuen, at 404-446-2560 or at [herb.schrayshuen@nerc.net](mailto:herb.schrayshuen@nerc.net). In addition, there is a NERC Reliability Standards Appeals Process.<sup>1</sup>

---

<sup>1</sup> The appeals process is in the Standard Processes Manual, [http://www.nerc.com/files/Appendix\\_3A\\_Standard\\_Processes\\_Manual\\_20110825.pdf](http://www.nerc.com/files/Appendix_3A_Standard_Processes_Manual_20110825.pdf).

**Index to Questions, Comments, and Responses**

1. The NERC Board of Trustees indicated that the interpretation process should not be used to address requests for a decision on “how” a reliability standard applies to a registered entity’s particular facts and circumstances. Do you believe this request for an interpretation is asking for clarity on the meaning of a requirement or clarity on the application of a requirement?x
2. The NERC Board of Trustees indicated that in deciding whether or not to approve a proposed interpretation, it will use a standard of strict construction and not seek to expand the reach of the standard to correct a perceived gap or deficiency in the standard. Do you believe this interpretation expands the reach of the standard?..... x
3. Do you agree with this interpretation? If not, why not. .... x
4. If you have any other comments that you have not already provided in response to the prior questions, please provide them here..... x

## **The Industry Segments are:**

- 1 — Transmission Owners
  - 2 — RTOs, ISOs
  - 3 — Load-serving Entities
  - 4 — Transmission-dependent Utilities
  - 5 — Electric Generators
  - 6 — Electricity Brokers, Aggregators, and Marketers
  - 7 — Large Electricity End Users
  - 8 — Small Electricity End Users
  - 9 — Federal, State, Provincial Regulatory or other Government Entities
  - 10 — Regional Reliability Organizations, Regional Entities



Group/Individual		Commenter		Organization		Registered Ballot Body Segment											
						1	2	3	4	5	6	7	8	9	10		
9.	Joe DePoorter	MGE	MRO	3, 4, 5, 6													
10.	Scott Nickels	RPU	MRO	4													
11.	Terry Harbour	MEC	MRO	1, 3, 5, 6													
12.	Marie Knox	MISO	MRO	2													
13.	Lee Kittelson	OTP	MRO	1, 3, 4, 5													
14.	Scott Bos	MPW	MRO	1, 3, 5, 6													
15.	Tony Eddleman	NPPD	MRO	1, 3, 5													
16.	Mike Brytowski	GRE	MRO	1, 3, 5, 6													
17.	Richard Burt	MPC	MRO	1, 3, 5, 6													
6.	Group	Mike Garton	Dominion			X		X		X	X						
Additional Member		Additional Organization		Region Segment Selection													
1.	Michael Gildea	Dominion Resources Services, Inc.	NPCC	5													
2.	Louis Slade	Dominion Resources Services, Inc.	RFC	5, 6													
3.	Connie Lowe	Dominion Resources Services, Inc.	MRO	5, 6													
4.	Michael Crowley	Virginia Electric and Power Company	SERC	1, 3													
7.	Group	Brenda Powell	Constellation Energy			X				X	X						
Additional Member		Additional Organization		Region Segment Selection													
1.	Greg Miller	Baltimore Gas & Electric Company	RFC	1													
2.	Amir Hammad	Constellation Power Source Generation, Inc.		5													
8.	Group	Jason Marshall	ACES Power Marketing Standards Collaborators										X				
Additional Member		Additional Organization		Region Segment Selection													
1.	Clem Cassmeyer	Western Farmers Electric Cooperative	SPP	1, 3, 5, 6													
2.	James Jones	AEPCO/SWTC	WECC	1, 5, 6													
3.	Michael Brytowski	Great River Energy	MRO	1, 3, 5, 6													
9.	Individual	Emily Pennel	Southwest Power Pool Regional Entity														X
10.	Individul	Robert Rhodes	Southwest Power Pool Standards Review Group				X										
11.	Individual	Janet Smith, Regulatory Affairs Supervisor	Arizona Public Service Company			X		X		X	X						
12.	Individual	Sandra Shaffer	PaciCorp			X		X		X	X						



1. The NERC Board of Trustees indicated that the interpretation process should not be used to address requests for a decision on "how" a reliability standard applies to a registered entity's particular facts and circumstances. Do you believe this request for an interpretation is asking for clarity on the meaning of a requirement or clarity on the application of a requirement?

**Summary Consideration:**

The majority of comments indicated the Request for Interpretation was seeking clarity of meaning. Many comments stated the request asks for clarity regarding the word "directive," which is consistent with seeking clarity of the meaning of the requirement. The IDT believes the interpretation provides the requested clarification and stays within the scope of the approved standard.

One minority comments stated that the interpretation as written will lead to a greater chance of 3-part communication not being executed properly. The IDT respectfully disagrees with this comment, and made no responsive changes to the interpretation to address this concern.

Some comments were concerned the interpretation introduces the new terms "routine operating instructions" and "normal operations," which are not defined and are used as a basis for the response to the request. The IDT notes that the terms above are terms used by the requester in the Request for Interpretation, and are appropriate for use within the interpretation.

Organization	Yes or No	Question 1 Comment
South Carolina Electric and Gas	The request is asking for clarity on the meaning of a requirement.	The request is asking for clarity on the definition of the word "directive", which thereby is asking for clarity on the meaning of the requirement.

Organization	Yes or No	Question 1 Comment
<b>Response:</b> The drafting team thanks you for your comments.		
NV Energy	The request is asking for clarity on the meaning of a requirement.	The request is regarding the meaning or scope of the requirement.
<b>Response:</b> The drafting team thanks you for your comments.		
Ingleside Cogeneration LP	The request is asking for clarity on the meaning of a requirement.	<p>The requests from the ISO/RTO Council are indicative of a lack of clarity in the meaning of COM-002-2 requirement R2. The NERC Glossary does not include a definition of “directive”, nor does the language in the requirement indicate the conditions under which a directive is to be issued.</p> <p>Without a uniform understanding between the issuer and the recipient that a communication is considered a directive, there is greater chance that 3-part communication will not be executed properly and/or the directed action is not taken in a timely fashion.</p> <p>Even if a mistake is avoided, the violation assessed to both the issuer (COM-002) and recipient (IRO-001 or TOP-001) of a directive can lead to severe penalties. It is not appropriate that a requirement calling for precise communications is not precise itself.</p>
<b>Response:</b> The drafting team thanks you for your comments. The drafting team recognizes the concerns about defining “directive,” but addressing that issue is outside of the scope of this interpretation. The drafting team encourages you to provide comment on Project 2007-02 Operating Personnel Communications Protocol, which is under development to address communication protocols.		

Organization	Yes or No	Question 1 Comment
Texas Reliability Entity	The request is asking for clarity on the application of a requirement.	<p>This request for interpretation should be rejected because the request for interpretation is seeking clarity on the application of the term “directive” as it relates to COM-002-2 R2.</p> <p>Further, the interpretation process should not be used to address how a reliability standard (in this case a term within a requirement) applies to a registered entity’s particular facts and circumstances. That is, if the interpretation is approved, a registered entity responding during “normal operations” is not obligated to comply with COM-002-2 R2.</p> <p>Also, in accordance with the Guidelines for Interpretation Drafting Teams, the interpretation shall not introduce new terms. This response introduces the new terms “routine operating instructions” and “normal operations”, which are not defined and are used as a basis for the response to the request.</p> <p>More important, the proposed interpretation concludes that a routine operating instruction during normal operations is not considered a “directive” and would not require three-part communications.</p> <p>This interpretation analyzes the term “directive” in a vacuum without consideration of its use in other standards, and this interpretation would result in the term being used uniquely in COM-002-2 R2. Specifically, TOP-001-1a R3, R4 and IRO-001-1.1 R8 also include the term “directive,” and it is used there to refer to the applicable functional entities complying with “routine operating instructions during normal conditions.”</p> <p>Unfortunately, if approved, this interpretation would result in greater confusion on the part of compliance monitoring and enforcement staff and registered entities staff, which is the antithesis of its clarifying purpose.</p>

**Response:** The drafting team thanks you for your comments. The IDT does not have the authority to reject this Request for

Organization	Yes or No	Question 1 Comment
		<p>Interpretation. The drafting team respectfully disagrees that this proposed interpretation seeks clarity on the application of the term “directive” as it relates to COM-002-2 R2.</p> <p>The drafting team did not introduce new terms, but incorporated existing and common terminology from the NERC Reliability standards and the text of the request for interpretation into the proposed interpretation. The drafting team would like to clarify that the Guidelines for Interpretation Drafting Teams document does not state “the interpretation shall not introduce new terms,” but rather states as a suggestion for drafting clear interpretations, “To the greatest extent possible, use the same terms as the requirement and the approved Reliability Standard being interpreted. Do not introduce new terms, even if they are understood to have the same meaning as the term used in the standard, unless it is necessary for clarification.”</p> <p>The drafting team did not analyze the term directive with consideration of its use in other standards, but rather stayed within the scope of the request for interpretation and clearly stated in the proposed interpretation that “COM-002-2 R2 does not specify the conditions under which a directive is issued, nor does it define directive.” The other requirements mentioned while also using the terms “directive” or “reliability directive” were not identified in this particular request for interpretation and thus are out of scope. The drafting team would like to clarify that the Guidelines for Interpretation Drafting Teams document does state, “An interpretation may not: clarify or interpret sections of an approved Reliability Standard other than the requirements of the standard.”</p> <p>The drafting team encourages you to provide comment on Project 2007-02 Operating Personnel Communications Protocol, which is under development to address communication protocols.</p>
Southwest Power Pool Standards Review Group		We find ourselves having some difficulty trying to figure out whether “how” applies to “meaning” or “application”. We don’t believe that the interpretation gets into the “how” but don’t know how to respond to your specific question.
<p><b>Response:</b> The drafting team thanks you for your comments. The “how” applies to “application”. The drafting team believes that the request is asking for clarity on the meaning of a requirement.</p>		
Constellation Energy	The request is asking for clarity on the meaning of a	We read this interpretation as clarifying the meaning of directive by pointing out the association with emergency operations per the standard language. In practice, though, the interpretation also clarifies the application of R2 to emergency operations rather than routine operating

Organization	Yes or No	Question 1 Comment
	requirement.	instructions. Either way, this interpretation does not determine how COM-002-2 R2 applies to a registered entity's particular facts and circumstances.
<b>Response:</b> The drafting team thanks you for your comments.		
Austin Energy	The request is asking for clarity on the application of a requirement.	
Central Lincoln	The request is asking for clarity on the meaning of a requirement.	
Manitoba Hydro	The request is asking for clarity on the meaning of a requirement.	
Duke Energy	The request is asking for clarity on the meaning of a requirement.	

Organization	Yes or No	Question 1 Comment
Oncor Electric Delivery Company LLC	The request is asking for clarity on the meaning of a requirement.	
Northeast Utilities	The request is asking for clarity on the meaning of a requirement.	
Pepco Holdings Inc	The request is asking for clarity on the meaning of a requirement.	
American Transmission Company. LLC	The request is asking for clarity on the application of a requirement.	
Edison Mission Group	The request is asking for clarity on the meaning of a requirement.	

Organization	Yes or No	Question 1 Comment
ERCOT	The request is asking for clarity on the meaning of a requirement.	
ISO New England, Inc	The request is asking for clarity on the meaning of a requirement.	
SERC Reliability Corporation	The request is asking for clarity on the meaning of a requirement.	
ITC	The request is asking for clarity on the meaning of a requirement.	
Northeast Power Coordinating Council	The request is asking for clarity on the meaning of a requirement.	

Organization	Yes or No	Question 1 Comment
NERC Functional Leaders	The request is asking for clarity on the meaning of a requirement.	
NERC Staff Technical Review	The request is asking for clarity on the meaning of a requirement.	
MRO NSRF	The request is asking for clarity on the meaning of a requirement.	
Dominion	The request is asking for clarity on the application of a requirement.	
ACES Power Marketing Standards Collaborators	The request is asking for clarity on the meaning of a requirement.	

Organization	Yes or No	Question 1 Comment
Southwest Power Pool Regional Entity	The request is asking for clarity on the meaning of a requirement.	
Arizona Public Service Company	The request is asking for clarity on the application of a requirement.	
NPCC	The request is asking for clarity on the meaning of a requirement.	
Exelon	The request is asking for clarity on the meaning of a requirement.	
American Electric Power	The request is asking for clarity on the meaning of a requirement.	



2. The NERC Board of Trustees indicated that in deciding whether or not to approve a proposed interpretation, it will use a standard of strict construction and not seek to expand the reach of the standard to correct a perceived gap or deficiency in the standard. Do you believe this interpretation expands the reach of the standard?

**Summary Consideration:**

The majority of comments indicated that the Interpretation did not expand the reach of the standard.

Some comments stated that the interpretation “unnecessarily” restricts the meaning and shrinks the reach of requirement R2 of COM-002-2, and that not requiring the communications protocols for repeat backs as specified in R2 in all situations is sending the wrong message to the Registered Entities. One comment stated the interpretation is not in the best interest of reliability or safety if the interpretation is accepted.

The team responded that the interpretation appropriately clarifies the meaning of the requirements within the context created by the purpose statement. The team believes this is also consistent with prior application and practices under the previous NERC Operating Policies, as well as with the intent of the Version 0 SDT.

The IDT encourages those commenters expressing concerns to consider providing comments on Project 2007-02 Operating Personnel Communications Protocol to offer recommendations that can address those concerns or to address items that are out of the scope of the Interpretation Request.

The drafting team believes that the proposed Interpretation does not restrict the meaning and reach of the standard and believes the interpretation properly addresses the question raised in the request for interpretation.

Organization	Yes or No	Question 2 Comment
NERC Functional Leaders	The interpretation does not expand the reach of the standard.	The proposed interpretation restricts the reach of the standard to the detriment of BES reliability as described in the attached letter.

**Response:** The drafting team thanks you for your comments. The drafting team respectfully disagrees with some of the concerns and conclusions raised in the attached letter and believes the interpretation properly addresses the question raised in

Organization	Yes or No	Question 2 Comment
<p>the request for interpretation. Nothing in the proposed interpretation prohibits any entity from using three part communication during all communications. The proposed interpretation merely addresses the question asked in the request for interpretation. The drafting team encourages stakeholders to provide comment on Project 2007-02 Operating Personnel Communications Protocol when it is posted to offer changes that can help alleviate the concerns raised in your comments.</p>		
NERC Staff Technical Review	The interpretation does not expand the reach of the standard.	NERC Staff feels the interpretation does not expand the reach of the standard; however, NERC staff does feel the interpretation unnecessarily restricts the meaning and reach of requirement R2 of COM-002-2 - Communications and Coordination (requirement R2). Requirement R2 makes no reference to emergency or non-emergency operating conditions; however, the interpretation is proposing to limit the meaning and reach of requirement R2 to only issuing directives using three-part communications "to address a real-time emergency." An interpretation should not limit the meaning and reach of a standard or requirement just as it should not expand the meaning and reach of a standard or requirement. The interpretation as drafted is not acceptable because it unnecessarily restricts the meaning and reach of requirement R2.
<p><b>Response:</b> The drafting team thanks you for your comments. The drafting team respectfully disagrees that the proposed interpretation restricts the meaning and reach of the standard and believes the interpretation properly addresses the question raised in the request for interpretation. The drafting team encourages you to provide comment on Project 2007-02 Operating Personnel Communications Protocol, which is under development to address Communication protocols.</p>		
NPCC	The interpretation does not expand the reach of the standard.	I believe that this Interpretation is shrinking, not expanding, the reach of the standard to the detriment of Bulk Power System reliability. The response from the drafting team is troubling. To say that "As such, routine operating instructions during normal operations would not require the communications protocols for repeat backs as specified in R2. " is sending the wrong message to the Registered Entities. The drafting team did not define what is considered "routine" in their response, but made the assertion that routine operating instructions are not subject to 3 way communications.

Organization	Yes or No	Question 2 Comment
		<p>One can interpret this response to indicate that during the course of switching transmission elements during normal operations, an operator would not be required to follow the 3 way communication protocol. As a worst case scenario, if as a result of that operator's action , the incorrect element was switched and loss of life occurred the drafting groups interpretation would indicate that 3 way communication would not apply. I don't believe this is in the best interest of reliability or safety if the drafting group's interpretation is accepted.</p>
		<p><b>Response:</b> The drafting team thanks you for your comments. The drafting team respectfully disagrees that the proposed interpretation restricts the meaning and reach of the standard and believes the interpretation properly addresses the question raised in the request for interpretation. The drafting team encourages you to provide comment on Project 2007-02 Operating Personnel Communications Protocol, which is under development to address Communication protocols. Safety standards are not addressed in the NERC Reliability Standards. Nothing in the proposed interpretation prohibits any entity from using three part communication during all communications. The proposed interpretation merely addresses the question asked in the request for interpretation.</p>
Ingleside Cogeneration LP	The interpretation does not expand the reach of the standard.	<p>Ingleside Cogeneration LP agrees that COM-002-2's purpose statement accurately captures the requirement's intent to ensure that 3-part communication is used to communicate directives addressing a real-time emergency. In fact, we believe the interpretation does not get specific enough about what qualifies as a real-time emergency - even though there are other standards, notably EOP-001, which identifies those conditions.</p> <p>In addition, we must point out that a nearly identical clarification request has been made to the Compliance Application drafting team (CAN-0021). Frankly, they have shown far-less hesitancy to offer broad interpretations of requirements that expand the reach of the standards - and that process is far less thoroughly vetted than the Interpretations process. It is not clear to us which view will prevail unless both NERC teams are coordinating their response; which has not been indicated in the supporting materials.</p>

Organization	Yes or No	Question 2 Comment
<p><b>Response:</b> The drafting team thanks you for your comments. The drafting team would like to clarify that the Guidelines for Interpretation Drafting Teams document does state, "An interpretation may not: clarify or interpret sections of an approved Reliability Standard other than the requirements of the standard." The interpretation of requirements outside of COM-002-2 R2 is outside of the scope of this request for interpretation.</p> <p>The drafting team is aware of CAN-021 and has been proceeding with this proposed interpretation while CAN-021 has been put on hold.</p>		
Texas Reliability Entity	The interpretation does not expand the reach of the standard.	On the contrary, the interpretation improperly reduces the reach of the standard. See additional comments below.
<p><b>Response:</b> The drafting team thanks you for your comments. The drafting team respectfully disagrees that this proposed interpretation improperly reduces the reach of the standard, and believes the proposed interpretation properly addresses the question raised in the request for interpretation.</p>		
ERCOT	The interpretation does not expand the reach of the standard.	The interpretation appropriately clarifies the meaning of the requirements under the context created by the purpose statement. This is also consistent with prior application and practice under the then-in-effect NERC Operating Policies and the intent of the Version 0 SDT, of which I was a member.
<p><b>Response:</b> The drafting team thanks you for your comments.</p>		
Northeast Power Coordinating Council	The interpretation does not	

Organization	Yes or No	Question 2 Comment
	expand the reach of the standard.	
MRO NSRF	The interpretation does not expand the reach of the standard.	
Dominion	The interpretation does not expand the reach of the standard.	
Constellation Energy	The interpretation does not expand the reach of the standard.	
Southwest Power Pool Standards Review Group	The interpretation does not expand the reach of the	

Organization	Yes or No	Question 2 Comment
	standard.	
ACES Power Marketing Standards Collaborators	The interpretation does not expand the reach of the standard.	
Southwest Power Pool Regional Entity	The interpretation does not expand the reach of the standard.	
Arizona Public Service Company	The interpretation does not expand the reach of the standard.	
Exelon	The interpretation does not expand the reach of the standard.	
American Electric Power	The	

Organization	Yes or No	Question 2 Comment
	interpretation does not expand the reach of the standard.	
Austin Energy	The interpretation does not expand the reach of the standard.	
Central Lincoln	The interpretation does not expand the reach of the standard.	
Manitoba Hydro	The interpretation does not expand the reach of the standard.	
Duke Energy	The interpretation does not expand the	

Organization	Yes or No	Question 2 Comment
	reach of the standard.	
Oncor Electric Delivery Company LLC	The interpretation does not expand the reach of the standard.	
Northeast Utilities	The interpretation does not expand the reach of the standard.	
Pepco Holdings Inc	The interpretation does not expand the reach of the standard.	
NV Energy	The interpretation does not expand the reach of the standard.	

Organization	Yes or No	Question 2 Comment
American Transmission Company, LLC	The interpretation does not expand the reach of the standard.	
South Carolina Electric and Gas	The interpretation does not expand the reach of the standard.	
Edison Mission Group	The interpretation does not expand the reach of the standard.	
SERC Reliability Corporation	The interpretation does not expand the reach of the standard.	
ITC	The interpretation	

Organization	Yes or No	Question 2 Comment
	does not expand the reach of the standard.	
ISO New England, Inc	The interpretation expands the reach of the standard.	

### 3. Do you agree with this interpretation? If not, why not.

#### Summary Consideration:

The Majority of the commenters support the interpretation as it is written.

Supporting statements confirm the Interpretation Drafting Team has taken a positive step by tying the purpose statement in the standard to R2, and affirming that a directive must be related to a real-time emergency. The IDT made no changes to the interpretation.

Some minority comments expressed concern with COM-002-2's Purpose statement. Those comments state the Purpose describes two separate subjects ("To ensure...communications capabilities are staffed and available for addressing a real-time emergency condition" and to "ensure communications by operating personnel are effective"), and neither are clearly defined with regard to how they apply to the requirements of the standard. Those comments further suggest the link between R2 and the first purpose statement related to emergency situations is not clear.

The IDT believes the Purpose statement *is* clear, and that it establishes Requirement 2 as being applicable only during emergencies.

Other comments stated the interpretation is not in the best interest of overall system reliability, indicating "the interpretation eliminates one of the tools available to improve human performance." The IDT does not believe the Interpretation precludes the use of 3 part communication by an entity if they chose to do so. As such the tool remains available, but it is not mandated that tool be used in situations other than emergencies.

Organization	Yes or No	Question 3 Comment
Southwest Power Pool Regional Entity	No	In SPP RE's opinion, COM-002-2's purpose indicates two separate ideas. The first is, "To ensure...communications capabilities are staffed and available for addressing a real-time emergency condition." The second is to "ensure communications by operating personnel are effective." As the interpretation notes, COM-002-2 R2 does not define the conditions to which the requirement applies - whether directives and three-way communications relate just to emergency situations or also to routine situations. The link between R2 and the first purpose statement related to emergency situations isn't clear. The standard's name "Communications and Coordination" also does not relate just to emergency situations. SPP RE thinks that routine

Organization	Yes or No	Question 3 Comment
		<p>communications related to non-emergency situations, such as switching instructions, should comply to R2. If instructions related to non-emergency yet important situations such as switching are not followed correctly, it could lead to an emergency. A communication should be considered a directive when the RC, TOP or BA gives instructions to take action.</p> <p>NERC states in its 2012 Implementation Plan that a high priority is “Ambiguous or incomplete voice communications”. This underscores the importance of ensuring all communications are clear and well-understood and that three-way communications are routine for operators.</p>
<p><b>Response:</b> The drafting team thanks you for your comments. The drafting team does not believe that the two statements are mutually exclusive of each other and that both statements work in conjunction to establish the purpose of the COM-002 standard.</p> <p>The drafting team would like to clarify that the proposed interpretation states “COM-002-2 R2 does not specify the conditions under which a directive is issued, nor does it define directive.” This is different than the comment that “As the interpretation notes, COM-002-2 R2 does not define the conditions to which the requirement applies - whether directives and three-way communications relate just to emergency situations or also to routine situations.”</p> <p>Nothing in the proposed interpretation prohibits any entity from using three part communication during all communications. While many of your concerns have merit and are certainly worthy of consideration, the drafting team believes it addressed the request for interpretation within the scope of the request. The drafting team encourages you to provide comments on Project 2007-02 Operating Personnel Communications Protocol when it is posted to offer recommendations.</p>		
Manitoba Hydro	No	Manitoba Hydro does not believe that the interpretation is in the best interest of overall system reliability. The interpretation eliminates one of the tools available to improve human performance.
<p><b>Response:</b> The drafting team thanks you for your comments. This interpretation does not forbid the use of three-part communication, so it does not eliminate one of the tools available to improve human performance.</p>		
NERC Staff Technical Review	No	NERC staff’s position is that use of three-part communications for issuing directives applies during all operating conditions (during both emergency and non-emergency

Organization	Yes or No	Question 3 Comment
		operating conditions). With respect to the ISO/RTO Council - Standards Review Committee's (Council) request regarding "clarify whether routine operating instructions are "directives,"" NERC staff is not clear as to what the Council considers a "routine operating instruction" and therefore cannot comment on that specific question at this time.
<b>Response:</b> The drafting team thanks you for your comments. The drafting team respects the NERC staff position on 3 part communication. The IDT also notes your observation on routine operating instructions. The IDT is confident in its understanding of what routine operating instructions means and believes the proposed interpretation properly addresses the question asked in the request for interpretation.		
Texas Reliability Entity	No	See response to question 1.
<b>Response:</b> The drafting team thanks you for your comments. We revisited your response to question 1. Please see responses to the comments on question 1.		
Ingleside Cogeneration LP	No	<p>The project team for COM-003-1 (Project 2007-02) has been working on many of the same issues related to the communication of directives for over four years. Although Ingleside Cogeneration LP believes that the COM-003-1 SDT has made significant progress, full closure may be a year or more away. However, the issues they have addressed could be worked into this project without extending the intent of the requirement.</p> <p>First, there is a need for clear guidance surrounding the conditions under which a "COM-002-2 R2 directive" must be issued. The Interpretation drafting team has taken a positive step by tying the purpose statement in the standard to R2 - and affirming that a directive must be related to a real-time emergency. However, there are gradations of emergencies ranging from anticipated SOL/IROL violations through catastrophic Interconnection cascading addressed in the BAL, EOP, and IRO standards. It is not clear if a pending condition would meet the threshold of a real-time emergency, or if a reliability parameter must actually be exceeded.</p>

Organization	Yes or No	Question 3 Comment
		<p>We believe that the emergency plans that a BA, RC, and TOP must develop in accordance with the BAL, EOP, and IRO standards would logically provide the criteria for 3-part communication. These standards could be cited in the interpretation for COM-002-2 R2 without expansion in scope.</p> <p>Similarly, operator processes must include a definitive statement that must precede a directive such as "My next statement will be a directive as governed by NERC standards. Please be prepared to respond appropriately..." This alert is necessary because the recipients of the directive will not have a view into the same monitoring systems as the issuer and may not even know that a real-time emergency is underway.</p> <p>Lastly, we do not agree that question of directives issued through electronic means such as email or remote-controlled dispatch should be ignored. Requirement R1 clearly addresses voice and data communication links, and R2 can be construed to read that electronic communication must be considered as well. Again, Ingleside Cogeneration LP believes a statement that R2 applies to voice communications only can be made without violating the language or the intent of the requirement.</p>
		<p><b>Response:</b> The drafting team thanks you for your comments. The drafting team would like to clarify that the Guidelines for Interpretation Drafting Teams document states, "An interpretation may not: clarify or interpret sections of an approved Reliability Standard other than the requirements of the standard." The interpretation of requirements outside of COM-002-2 R2 is outside of the scope of this request for interpretation.</p> <p>The proposed interpretation merely addresses the question asked in the request for interpretation. The drafting team encourages you to provide comment on electronic communication and to recommend the protocol of a preliminary definitive directive statement on Project 2007-02 Operating Personnel Communications Protocol, which is under development to address Communication protocols.</p>
NERC Functional Leaders	No	The proposed interpretation will lead to greater compliance issues and will confuse operators as discussed in the attached letter.
<p><b>Response:</b> The drafting team thanks you for your comments. The drafting team respectfully disagrees that this proposed</p>		

Organization	Yes or No	Question 3 Comment
interpretation will lead to greater compliance issues and believes the proposed interpretation properly addresses the question raised in the request for interpretation. Nothing in the proposed interpretation prohibits any entity from using three part communication during all communications. The proposed interpretation merely addresses the question asked in the request for interpretation.		
NPCC	No	<p>The Purpose statement of COM-002 includes TWO purposes as its goal.</p> <p>1) To ensure that Balancing Authorities, Transmission Operators, and Generator Operators have adequate communications and that these communications capabilities are staffed and available for addressing a real-time emergency condition</p> <p>2) To ensure communications by operating personnel are effective.</p> <p>These are two separate and distinct purposes. They are not separated by a comma to indicate that communications must only be effective during real-time emergencies.</p> <p>As it is currently written, R2 requires that 3-way communication protocols must be used for ALL directives. The wording of the Purpose statement and R2 do not differentiate between directives issued during real-time emergency condition vs. directives issued during real-time non-emergency conditions. The second purpose of the COM-002 Purpose statement is “to ensure communications by operating personnel are effective”. The standard as it is currently written encompasses all communication whether they be routine directives or emergency directives. Directives should not be interpreted as routine.</p> <p>To ensure the reliability and security of the Bulk Power System, 3-way communication is required at all times. It should not be expected to require operating personnel to adjust their communication protocols as real-time events occur on the system as this can lead to ineffective communications. Reliability would be better served if the operating personnel were required to use 3-way communication at all times, even before real-time emergencies occur so as to remain seamless in their response to events on the Bulk Power System.</p> <p>To differentiate between emergency and non-emergency communication requirements, a revision of the COM-002 standard should be expedited instead of</p>

Organization	Yes or No	Question 3 Comment
		offering an interpretation. A revision that specifies to use 3 way communication during operational and reliability directives would offer final closure to all interested parties.
<p><b>Response:</b> The drafting team thanks you for your comments. The drafting team respectfully disagrees with your assertions, and believes that the Purpose statement does help establish that the scope of the Standard applies to real-time emergencies. The drafting team does not believe that the two statements are mutually exclusive of each other; both statements work in conjunction to establish the purpose of the COM-002 standard. The drafting team did not attempt to define the term “directive,” but believes the interpretation properly addresses the question raised in the request for interpretation.</p> <p>Nothing in the proposed interpretation prohibits any entity from using three part communication during all communications. The proposed interpretation merely addresses the question asked in the request for interpretation.</p> <p>While many of your concerns have merit and are certainly worthy of consideration, the drafting team believes it addressed the request for interpretation within the scope of the request. The drafting team encourages you to provide comments on Project 2007-02 Operating Personnel Communications Protocol when it is posted to offer recommendations.</p>		
Oncor Electric Delivery Company LLC	No	<p>The response given by NERC tends to cloud the issue even further. For example in the first statement of the interpretation it states that R2 does not define the conditions under which a directive can be issued, while the following sentence states that R2 applies under the condition of a real-time emergency.</p> <p>Oncor Electric Delivery Company takes the position that the interpretation would have more clarity if it simply stated “If any of the applicable registered entities (Reliability Coordinator, Balancing Authority, Transmission Operator, or Generator Operator) declares a real-time emergency condition, the communication protocols as stated in R2 are required.</p>
<p><b>Response:</b> The drafting team thanks you for your comments. The drafting team believes that defining the conditions under which a directive can be issued would be going outside of the scope of the request for interpretation. The drafting team also believes the proposed wording to declare a real time emergency would also go outside of the scope of the request for interpretation.</p>		

Organization	Yes or No	Question 3 Comment
Texas Reliability Entity	No	<p>We disagree with this interpretation because the reference to “real-time emergency condition” in the Purpose statement does not limit the requirements to applying only during emergency conditions. The first sentence of the Purpose clearly applies to R1, and the second sentence is directed to R2. There is no basis for relying on the first sentence of the Purpose to limit the applicability of R2. There is no reference to “emergency condition” in the second sentence. Furthermore, there is no basis anywhere in COM-002-2 for issuing any interpretation to further define what is meant by the term “directive” in R2. Any clarification of that term will have to be made through the standard revision process.</p> <p>For the purpose of this standard, we believe “directives” should include at least “actual and anticipated emergency operating conditions,” and it should preferably include operating instructions delivered during normal routine operations. This interpretation could undermine existing practices that help avoid emergencies, and it will reduce the current level of reliability. Clear, concise and definitive communication is needed before emergency conditions occur, as well as during emergency operating condition events. An emergency declaration should not be the prerequisite to requiring clear, concise and definitive communication. There are instances in the Reliability Standards where “anticipated” conditions call for actions that require clear, concise and definitive communication to avoid or mitigate an emergency (see TOP-001-1 R5 and EOP-002 R4). If clear, concise and definitive communication is used routinely during normal operations, such as it is normally used in routine day-to-day switching activities, there will be a lower tendency for errors to occur during emergency and anticipated emergency conditions.</p>
<p><b>Response:</b> The drafting team thanks you for your comments. The drafting team respectfully disagrees, and believes that the Purpose statement does help establish that the scope of the Standard applies to real-time emergencies. The drafting team does not believe that the two statements are mutually exclusive of each other; both statements work in conjunction to establish the purpose of the COM-002 standard. The drafting team did not attempt to define the term “directive,” but believes the interpretation properly addresses the question raised in the request for interpretation.</p>		

Organization	Yes or No	Question 3 Comment
		<p>Nothing in the proposed interpretation prohibits any entity from using three part communication during all communications. The proposed interpretation merely addresses the question asked in the request for interpretation.</p> <p>While many of your concerns and recommendations have merit and are certainly worthy of consideration, the drafting team believes it addressed the request for interpretation within the scope of the request. The drafting team encourages you to provide comments on Project 2007-02 Operating Personnel Communications Protocol when it is posted to offer recommendations.</p>
ACES Power Marketing Standards Collaborators	Yes	Although we agree with the interpretation, we would support re-inserting the comment that clarifies the requirement applies to verbal communication and not electronic communication. The drafting team indicated it struck the comment because it does not address the question. While it is accurate that the question did not specifically ask about electronic communications, the issue is raised in the material impact section of the interpretation request. Thus, it is reasonable to address.
		<p><b>Response:</b> The drafting team thanks you for your comments. The drafting team recognizes your concern about electronic communications but believes the interpretation properly addresses the specifics of the question raised in the request for interpretation. The drafting team encourages you to provide comments on Project 2007-02 Operating Personnel Communications Protocol when it is posted to offer recommendations.</p>
ITC	Yes	As this interpretation helps remove some of the ambiguity in the standard "Purpose" statement and Requirement 2, we generally support it. However we also believe system operators should use 3-part communications for more than just emergency directives. We look forward to the completion of other standard develop efforts to resolve this gap.
		<p><b>Response:</b> The drafting team thanks you for your comments. The drafting team encourages you to provide comments on Project 2007-02 Operating Personnel Communications Protocol when it is posted to offer recommendations.</p>
Duke Energy	Yes	However the interpretation could be improved by adding the word "identified" before the word "directive" in the second sentence of the response. The current wording could potentially be viewed by an auditor as requiring repeat-back for all

Organization	Yes or No	Question 3 Comment
		communications during an emergency.
<p><b>Response:</b> The drafting team thanks you for your comments. The drafting team believes that adding descriptive language or conditions to the word "directive" would be outside of the scope of the request for interpretation. The suggestion you propose has merit and we recommend that you provide comments for project 2007-2 when it is posted.</p>		
ERCOT	Yes	I served for several years on the NERC RCWG and ORS, including the time during which Operating Policies were updated just prior to drafting of the Version 0 standards. I participated in numerous discussions about the meaning of the language in the Policies and as a member of the Version 0 SDT, in which the intent was clearly applicable to emergency operations.
<p><b>Response:</b> The drafting team thanks you for your comments and for the additional legacy information on version 0.</p>		
Central Lincoln	Yes	It is clear from the Purpose statement of the standard that the requirements are for dealing with real time emergencies.
<p><b>Response:</b> The drafting team thanks you for your comments.</p>		
SERC Reliability Corporation	Yes	The drafting team was correct in using the Purpose of COM-002 to limit R2 to real-time emergency conditions. The development record for this standard and requirement as it was converted from the old Operating Policies indicates that the intent was that it only applies to emergency conditions. The text of R2 in COM-002-2 is unchanged from that in both version 1 and version 0 of the standard. The Version 0 drafting team was charged with converting the Operating Policies into enforceable standards, and to do so without substantive technical changes from the basic requirements of the policies. The drafting team markup of the Operating Policies (which was part of the developmental record included in the Version 0 FERC filing) shows that the text for R2 was taken directly from a section about emergency requirements -- Requirement 2.2 of Section B (Communications and Coordination) of Policy 5 (Emergency Operations). In addition, it should be noted that the use of three-

Organization	Yes or No	Question 3 Comment
		part communications was not specified in the Operating Policies section on normal operations communications requirements -- Requirement 6 (Communication of facility status) of Section A (Normal Operations) of Policy 6 (Operations Planning).
<b>Response:</b> The drafting team thanks you for your comments and for the additional legacy information on version 0.		
Northeast Power Coordinating Council	Yes	
MRO NSRF	Yes	
Dominion	Yes	
Constellation Energy	Yes	
Southwest Power Pool Standards Review Group	Yes	
Arizona Public Service Company	Yes	
PacifiCorp	Yes	
Exelon	Yes	
American Electric Power	Yes	
Austin Energy	Yes	
Northeast Utilities	Yes	

Organization	Yes or No	Question 3 Comment
Pepco Holdings Inc	Yes	
NV Energy	Yes	
American Transmission Company. LLC	Yes	
South Carolina Electric and Gas	Yes	
Edison Mission Group	Yes	
ISO New England. Inc	Yes	

4. If you have any other comments that you have not already provided in response to the prior questions, please provide them here.

**Summary Consideration:**

The majority of commenters support the current draft of the interpretation.

Some comments include a recommendation that this interpretation should also apply to IRO-001-1.1 R8 and TOP-001-1 R3 and R4, as these standards contain references to directives and could also be clarified through this interpretation. The IDT agrees, but believes this would go beyond the scope of the interpretation request.

A commenter points out at least two active Standard Drafting Team projects (2007-03 and 2006-06) include in their revisions a definition of a directive. The IDT agrees with the observation, and notes the OPCP team working on project 2007-02 is coordinating with these 2 projects.

Another commenter states the interpretation clarifies the association between directives and real-time emergencies, but the standard language needs to state that the RC, TOP and BA shall clearly identify the communication as a directive. The IDT believes this has merit, but modifying the standard is beyond the scope of this Interpretation.

Finally one comment points out the requirement addresses verbal communication, so electronic communication would not fall under COM-002-2 R2. The IDT believes electronic communication was not included in the Request for Interpretation, and to the extent it needs to be addressed, should be the subject of a separate standards development effort.

The drafting team believes that adding descriptive language or conditions to the word “directive” would be outside of the scope of the request for interpretation. The team has recommended other channels through which these comments can be addressed.

Organization	Yes or No	Question 4 Comment
Bonneville Power Administration		BPA thanks you for the opportunity to comment on Project 2009-22 Interpretation of COM-002-2 for ISO/RTO Council - Communications and Coordination. BPA has no comments or concerns at this time.

Organization	Yes or No	Question 4 Comment
<b>Response:</b> The drafting team thanks you for your participation.		
Constellation Energy		Constellation agrees with the interpretation and adds two points of note: oThis interpretation should also apply to IRO-001-1.1 R8 and TOP-001-1 R3 and R4. These standards contain reference to directives without the situational clarity and will be aided by use of this interpretation. oAt least two active Standard Drafting Team ("SDT") projects, 2007-03 and 2006-06 include in their revisions a definition of a directive (they are calling it a reliability directive). The project 2006-06 team appears to be taking the lead to develop a more clear definition. While we understand that this interpretation is not able to change the actual language of the standard, the interpretation is relevant to developing a definition of "directive." The interpretation clarifies the association between directives and real-time emergencies. We find another concern with the standard language in that it needs to state that the RC, TOP and BA shall clearly identify the communication as a directive. Constellation hopes that the interpretation record will help inform the standard revision projects underway.
<b>Response:</b> The drafting team thanks you for your comments. The drafting team believes that addressing issues in other Standards and adding additional definitions and or conditions of and for a directive would be going outside of the scope of the request for interpretation. The Standard drafting team (OPCPST) for 2007-2 is coordinating with the teams working on 2007-3 and 2006-6 to develop additional clarity and a higher level of reliability.		
Edison Mission Group		I believe the interpretation would have been more effective if it identified generally accepted examples of directives, to include but not be limited to. These examples would be helpful to the industry.
<b>Response:</b> The drafting team thanks you for your comments. The drafting team believes that creating examples of directives would potentially have merit, but that particular activity is outside of the Interpretation process and may cause additional issues.		

Organization	Yes or No	Question 4 Comment
Southwest Power Pool Regional Entity		If R2 is to just apply to real-time emergency situations, it should be rewritten to include this parameter. We encourage NERC to define the term "Directive". We appreciate the standard drafting team's efforts on this interpretation.
<b>Response:</b> The drafting team thanks you for your comments. The drafting team notes your recommendation and recommends you provide comment on Project 2007-02 Operating Personnel Communications Protocol to offer recommendations that can address the concerns raised in your comment. The drafting team believes that additional definition and or conditions of and for a directive would be going outside of the scope of the request for interpretation.		
LG&E and KU Services Company		NERC's response to the interpretation request include "COM-002-2 R2 does not specify the conditions under which a directive is issued, nor does it define directive. It only provides that the requirements to be followed when a directive is issued to address a real-time emergency. Routine operating instructions can be directives. COM-002-2 does not apply to all directives. The purpose statement for COM-002-2 is "To ensure Balancing Authorities, Transmission Operators, and Generator Operators have adequate communications and that these communications capabilities are staffed and available for addressing a real-time emergency condition. To ensure communications by operating personnel are effective." As such, Routine operating instructions during normal operations would not require the communications protocols for repeat backs as specified in R2. The requirement addresses verbal communication, so electronic communication would not fall under COM-002-2 R2." LG&E and KU Services Company believe that the interpretation should provide the means to identify Directives. Directives should be stated as such during the communication. It is recommended that the interpretation include the following statement: "A directive should be identified as a directive by the issuer and the reply by the entity receiving the directive should state that this communication is understood to be a directive." This will eliminate any confusion as to what is or is not a directive.

Organization	Yes or No	Question 4 Comment
<p><b>Response:</b> The drafting team thanks you for your comments. The drafting team notes your concerns regarding clearly identifying a directive by announcing it as such but believes that additional definition and or conditions of and for a directive would be going outside of the scope of the request for interpretation. The drafting team encourages you to consider commenting on Project 2007-02 Operating Personnel Communications Protocol, under development, to offer your comments on electronic communication and recommend the protocol of a preliminary directive statement.</p>		
Arizona Public Service Company		No comments
NERC Functional Leaders		The attached letter dated November 18, 2011 articulates our very strong concerns about this proposed interpretation.
<p><b>Response:</b> The drafting team thanks you for your comments. The drafting team recognizes your deep concerns but believes it adhered to the ROP and SPM and properly interpreted the Requirement within the boundaries of the Standard and the Requirement. The interpretation drafting team is limited to working within the language of the standard, and believes it has developed aninterpretation that is consistent with the standard as required.</p>		
Texas Reliability Entity		The interpretation does not address the related issue of whether and how this standard applies to electronic instructions, which, as stated in the interpretation request, can be used “during routine operations as well as during emergency operations.”
<p><b>Response:</b> The drafting team thanks you for your comments. The drafting team notes your concerns about electronic instructions but believes it is outside of the question asked in the request for interpretation. The drafting team encourages you to consider commenting on Project 2007-02 Operating Personnel Communications Protocol, under development, to offer your comments on electronic communication.</p>		
NERC Staff Technical Review		The interpretation is contrary to Recommendation 26 of the 2003 Blackout Report (to tighten communications) and is also contrary to paragraph 532 of FERC Order 693 where it references “normal, alert and emergency conditions:” “532. While we agree

Organization	Yes or No	Question 4 Comment
		<p>with EEI that EOP-001-0, Requirement R4.1 requires communications protocols to be used during emergencies, we believe, and the ERO agrees, that the communications protocols need to be tightened to ensure Reliable Operation of the Bulk-Power System. We also believe an integral component in tightening the protocols is to establish communication uniformity as much as practical on a continent-wide basis. This will eliminate possible ambiguities in communications during normal, alert and emergency conditions. This is important because the Bulk-Power System is so tightly interconnected that system impacts often cross several operating entities' areas." An emergency cannot be pre-determined. It is only recognized once the emergency condition already exists. There is a degree of probability or likelihood that an orderly transition from non-three-part communication to three-part communication is unlikely to occur during the transition from "normal operating conditions" to an emergency condition if the use of three-part communications is not routinely applied during all (including non-emergency) conditions. The consistent utilization of three-part communication during all conditions that involve changing the operating state of the BES will develop and strengthen the operating culture and will make it less likely to create a misunderstanding that will develop into a serious event. The probability of miscommunications, whether during emergency or non-emergency conditions, that could potentially lead to a cascading outage or other major event are indistinguishable. The use of three-part communications for issuing directives should be used at all times as required by requirement R2 of COM-002-2 - Communications and Coordination.</p>
<p><b>Response:</b> The drafting team thanks you for your comments. The drafting team recognizes your deep concerns but believes it adhered to the ROP and SPM and properly interpreted the Requirement within the boundaries of the Standard and the Requirement. The drafting team believes that Recommendation 26 of the 2003 Blackout Report and paragraph 532 of FERC Order 693 actually highlight a future need and not a current status of COM-002 standard, which is made clear in that the Commission directed modifications to COM-002 to respond to the concerns cited. This directive and Recommendation 26 is a primary driver for Project 2007-02.</p>		

Organization	Yes or No	Question 4 Comment
		<p>The SDT would also like to clarify that there are several requirements that actually require steps that entities must take in anticipation of emergencies (EOP-002 R4, IRO-005 R15). The assertion that “an emergency cannot be pre-determined... it is only recognized once the emergency condition already exists” would go against the current framework of the standards. Emergency conditions can be anticipated at times based on forecasted conditions and monitoring by entities.</p> <p>Nothing in the proposed interpretation prohibits any entity from using three part communication during all communications. The proposed interpretation merely addresses the question asked in the request for interpretation. The drafting team encourages you to provide comment on Project 2007-02 Operating Personnel Communications Protocol to offer changes that can address the concerns raised in your comments.</p> <p>While the drafting team disagrees with the notion that “The probability of miscommunications, whether during emergency or non-emergency conditions, that could potentially lead to a cascading outage or other major event are indistinguishable”, it is beyond the scope of the request for interpretation. The condition of the system during emergencies is different than those of non-emergency conditions, which is why emergency procedures are applied during emergency conditions.</p> <p>While many of your concerns have merit and are certainly worthy of consideration, the drafting team believes it addressed the request for interpretation within the scope of the request.</p>
American Transmission Company, LLC		<p>The interpretation makes it very clear that a Directive is to be used to address a system emergency, and not for normal operating conditions, or an action that may affect the reliability of the BES. We agree with the interpretation as it limits the requirement to use 3-way communication to real-time emergencies. Entities may choose to use 3-way communications as standard operating practice, but it is only required during emergencies. ATC believes that, with this interpretation, other NERC Standards such as VAR-001-2 R6.1, and VAR-002-1.1b R2, using the term “direct”, should be clarified whether it falls under the same interpretation as the term “Directive”. Requirements below:</p> <p>R6.1. When notified of the loss of an automatic voltage regulator control, the Transmission Operator shall direct the Generator Operator to maintain or change either its voltage schedule or its Reactive Power schedule.</p> <p>R2. Unless exempted by the Transmission Operator, each Generator Operator shall</p>

Organization	Yes or No	Question 4 Comment
		maintain the generator voltage or Reactive Power output (within applicable Facility Ratings) as directed by the Transmission Operator.
<b>Response:</b> The drafting team thanks you for your comments. The drafting team notes your concerns over other Standards and the word "direct," but Interpretation drafting guidance limits a clarification to this Requirement and COM 002-2 under this project. The team recommends making that request for clarification on related Standards after final approval of this Interpretation by FERC.		
MRO NSRF		The MRO NSRF wishes to thank the team that devised this clarification
<b>Response:</b> The drafting team thanks you for your comments.		
American Electric Power		The response states that the standard "provides that the requirements be followed when a directive is issued to address a real-time emergency", however no clarification is provided to explain exactly what would constitute a "real-time emergency".
<b>Response:</b> The drafting team thanks you for your comments. The drafting team believes that additional descriptive language (in this case, specifying what constitutes a real time emergency) would be going outside of the scope of this request for interpretation.		
Southwest Power Pool Standards Review Group		We would like to express our thanks to the drafting team for their efforts in developing this interpretation.
<b>Response:</b> The drafting team thanks you for your comments.		
SERC Reliability Corporation		<p>While the practice of three-part communications may improve clarity in communications between operating personnel and the definition of a "directive" should be applied to more routine operating instructions, the proposed interpretation is squarely within the four corners of the standard. An expansion of scope, otherwise, should be made as part of a standards development activity and not as part of a standards interpretation.</p> <p>Currently there are three NERC standards projects addressing this. Project 2006-06</p>

Organization	Yes or No	Question 4 Comment
		(Reliability Coordination--Draft-4 version of COM-002-3) and Project 2007-03 (Real-time Transmission Operation--Draft-5 of TOP-001-2) both include similar draft definitions of a "directive." Both definitions limit a directive to communication initiated where action by the recipient is necessary to address an emergency. Project 2007-02 (Operating Personnel Communications Protocols--Draft 1 version of COM-003-1) R5 requires use of three-part communications for "Communication between two or more entities to exchange reliability-related information to be used by the entities to change the state or status of an element or facility of the Bulk Electric System." None of these projects are currently posted for comments, but all three are listed on the NERC web site as "Projects in Active Formal Development."

**Response:** The drafting team thanks you for your comments. The drafting team is very aware of the subject projects and is made up from the members of the drafting team for 2007-02 (Operating Personnel Communication Protocols). We are coordinating our efforts with all of those teams and each project is in various stages of the process. You can expect to see more postings throughout 2012.

Continued

**Additional Comments Received:**

NERC functional leaders (letter attached)

November 18, 2011

To: Project 2009-22 Interpretation of COM-002-2 R2 for IRC Drafting Team

Re: Proposed Interpretation of COM-002-2 R

Colleagues:

Under the Standards Committee's [Roles and Responsibilities](#) document (page 8), *NERC staff is encouraged to provide comments during the standards development process.* In support of the recent technical comments submitted by NERC staff, we would like to emphasize the importance of three-part communication as you finalize your proposed interpretation of COM-002-2R2.

An important element to conducting real-time operations and critical activities on the Bulk Electric System (BES) is continuous, clear, and unambiguous communications. Limiting a fundamental safeguard such as three-part communication protocols to implementation only during times of emergencies creates a false sense of security, potentially threatens the reliability of the BES, and creates the presumption that operators cannot make mistakes during normal operations while conducting critical activities.

Three-part communication errors have been identified in many of the events assessed by NERC and has, at a minimum, been a contributing factor in some major disturbances. The use of three-part communication to reduce miscommunication is not unique to our industry and is used in a myriad industries and professions including commercial aviation, and all branches of the military. It has also been adopted by the medical industry for use when issuing verbal orders.

The interpretation, as proposed, will put system operators in the difficult position of not knowing "when" to implement three-part communication if they are not already in the habit of doing so under normal operating conditions. An emergency cannot be pre-determined; it is only recognized after it starts. Based on the review of many emergency tapes from control rooms, it is very unlikely that an orderly transition from conversational communication to three-part communication will take place during an emergency event. Studies show that during an emergency, people fall back into familiar routines. Therefore, the interpretation, if implemented, will likely increase the risk of compliance failure rather than mitigate the industry's compliance risk. The arguments as to whether three-part communication is encompassed within the existing standard for all BES related communication is presented in the NERC staff comments.

The results of a miscommunication causing a blackout in either routine or emergency conditions are indistinguishable. Communications should be conducted using a common protocol to minimize the chance of both operating error and compliance violations.

Sincerely,



Herb Schrayshuen

Vice President of Standards and Training



Michael Moon  
Director of Compliance Operations



Earl Shockley  
Director of Reliability Risk Management

cc: Allen Mosher – Chair, NERC Standards Committee

**Response:** The drafting team thanks you for your comments and acknowledges your concerns for reliability. The interpretation does not limit the use of three part communications during routine operations, and most team members would support its continued use outside of the Standard.

The IDT can not speculate on the potential effect of changing communications protocol based on routine or emergency conditions, as it has not reviewed factual data relating to this topic. The team focused on interpreting the language in the Standard as written. Based on the Purpose statement, the IDT believes the Standard as written covers emergency conditions only.

**END OF REPORT**