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Question 4 Comments (34 Responses)

Individual
Walter Cintron
NPCC
The request is asking for clarity on the meaning of a requirement.
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. 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.
No
The Purpose statement of COM-002 includes TWO purposes as its goal. 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. 2) To ensure communications by operating personnel are effective. 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. 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. 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. To differentiate between emergency and non-emergency communication requirements, a revision of the COM-002 standard should be expedited instead of 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.

Group
Arizona Public Service Company
Janet Smith, Regulatory Affairs Supervisor
The request is asking for clarity on the application of a requirement.
The interpretation does not expand the reach of the standard.
Yes
No comments
Group
Northeast Power Coordinating Council
Guy Zito
The request is asking for clarity on the meaning of a requirement.
The interpretation does not expand the reach of the standard.
Yes
Individual
John Bee
Exeoln
The request is asking for clarity on the meaning of a requirement.
The interpretation does not expand the reach of the standard.
Yes
Individual
Thad Ness
American Electric Power
The request is asking for clarity on the meaning of a requirement.
The interpretation does not expand the reach of the standard.
Yes
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”.
Individual
Michelle R D’Antuono
Ingleside Cogeneration LP
The request is asking for clarity on the meaning of a requirement.
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. 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. 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.

The interpretation does not expand the reach of the standard.

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. 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.

No

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. 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. 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. 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. 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.

Group

LG&E and KU Services Company

Brent Ingebrigtsen

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.

Group

NERC Functional Leaders

Herb Schrayshuen

The request is asking for clarity on the meaning of a requirement.

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.

No

The proposed interpretation will lead to greater compliance issues and will confuse operators as discussed in the attached letter.

The attached letter dated November 18, 2011 articulates our very strong concerns about this proposed interpretation.

Individual

Jeanie Doty

Austin Energy

The request is asking for clarity on the application of a requirement.

The interpretation does not expand the reach of the standard.

Yes

Group

PacifiCorp

Sandra Shaffer

Yes

Individual

Steve Alexanderson

Central Lincoln

The request is asking for clarity on the meaning of a requirement.

The interpretation does not expand the reach of the standard.

Yes

It is clear from the Purpose statement of the standard that the requirements are for dealing with real time emergencies.

Group

NERC Staff
David Taylor
The request is asking for clarity on the meaning of a requirement.
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.
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 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.
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 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.
Individual
Don Jones
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.
No
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. 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.

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.”

Individual

Joe Petaski

Manitoba Hydro

The request is asking for clarity on the meaning of a requirement.

The interpretation does not expand the reach of the standard.

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.

Individual

Greg Rowland

Duke Energy

The request is asking for clarity on the meaning of a requirement.

The interpretation does not expand the reach of the standard.

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 communications during an emergency.

Individual

Darryl Curtis

Oncor Electric Delivery Company LLC

The request is asking for clarity on the meaning of a requirement.

The interpretation does not expand the reach of the standard.

No

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. 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.
Individual
Michael R. Lombardi
Northeast Utilities
The request is asking for clarity on the meaning of a requirement.
The interpretation does not expand the reach of the standard.
Yes
Group
Southwest Power Pool Regional Entity
Emily Pennel
The request is asking for clarity on the meaning of a requirement.
The interpretation does not expand the reach of the standard.
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 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. 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.
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.
Individual
David Thorne
Pepco Holdings Inc
The request is asking for clarity on the meaning of a requirement.
The interpretation does not expand the reach of the standard.
Yes
Individual

Rich Salgo
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.
The interpretation does not expand the reach of the standard.
Yes
Group
MRO NSRF
William Smith
The request is asking for clarity on the meaning of a requirement.
The interpretation does not expand the reach of the standard.
Yes
The MRO NSRF wishes to thank the team that devised this clarification
Group
Dominion
Mike Garton
The request is asking for clarity on the application of a requirement.
The interpretation does not expand the reach of the standard.
Yes
Individual
Andrew Z. Pusztai
American Transmission Company. LLC
The request is asking for clarity on the application of a requirement.
The interpretation does not expand the reach of the standard.
Yes
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: 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. R2. Unless exempted by the Transmission Operator, each Generator Operator shall maintain the generator voltage or Reactive Power output (within applicable Facility Ratings ¹) as directed by the Transmission Operator.

Individual
RoLynda Shumpert
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.
The interpretation does not expand the reach of the standard.
Yes
Individual
Ellen Oswald
Edison Mission Group
The request is asking for clarity on the meaning of a requirement.
The interpretation does not expand the reach of the standard.
Yes
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.
Individual
Chris Higgins / Fran Halpin / Rebecca Berdahl / Tim Loepker / Ted Snodgrass / Erika Doot
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.
Group
Constellation Energy
Brenda Powell
The request is asking for clarity on the meaning of a requirement.
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 instructions. Either way, this interpretation does not determine how COM-002-2 R2 applies to a registered entity's particular facts and circumstances.
The interpretation does not expand the reach of the standard.
Yes
Constellation agrees with the interpretation and adds two points of note: •This 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. •At 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.

Individual

H. Steven Myers

ERCOT

The request is asking for clarity on the meaning of a requirement.

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.

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.

Individual

Kathleen Goodman

ISO New England, Inc

The request is asking for clarity on the meaning of a requirement.

The interpretation expands the reach of the standard.

Yes

Individual

Carter B. Edge

SERC Reliability Corporation

The request is asking for clarity on the meaning of a requirement.

The interpretation does not expand the reach of the standard.

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-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).

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. Currently there are three NERC standards projects addressing this. Project 2006-06 (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."

Group

Southwest Power Pool Standards Review Group

Robert Rhodes

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.

The interpretation does not expand the reach of the standard.

Yes

We would like to express our thanks to the drafting team for their efforts in developing this interpretation.

Individual

Derrick Davis

Texas Reliability Entity

The request is asking for clarity on the application of a requirement.

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. 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. 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. 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. 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." 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.

No

See response to question 1.

Individual

Michael Moltane

ITC

The request is asking for clarity on the meaning of a requirement.

The interpretation does not expand the reach of the standard.
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.
Group
ACES Power Marketing Standards Collaborators
Jason Marshall
The request is asking for clarity on the meaning of a requirement.
The interpretation does not expand the reach of the standard.
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.

Additional Comments Received Attached:

NERC functional leaders

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