

Note: an Interpretation cannot be used to change a standard.

Request for an Interpretation of a Reliability Standard
Date submitted: October 1, 2009
Date accepted: October 2, 2009
Contact information for person requesting the interpretation:
Name: Kathleen Goodman
Organization: ISO/RTO Council – Standards Review Committee
Telephone: (413) 535-4111
E-mail: kgoodman@iso-ne.com
Identify the standard that needs clarification:
Standards Numbers (include version number): COM-002-2
Standards Titles: Communications and Coordination
Identify specifically what requirement needs clarification:
<p>Requirement Number and Text of Requirement:</p> <p>R2. Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall issue directives in a clear, concise, and definitive manner; shall ensure the recipient of the directive repeats the information back correctly; and shall acknowledge the response as correct or repeat the original statement to resolve any misunderstandings.</p> <p>Clarification needed:</p> <p>Please clarify whether routine operating instructions are “directives” or whether “directives” are limited to actual and anticipated emergency operating conditions.</p>
Identify the material impact associated with this interpretation:
<p>Identify the material impact to your organization or others caused by the lack of clarity or an incorrect interpretation of this standard.</p> <p>There are at least two potential material impacts to registered entities caused by lack of clarity or an incorrect interpretation of this term.</p> <p>First, sometimes Regional Entities, for compliance purposes, will seek corroboration from RCs, BAs, and TOPs about whether other registered entities follow their “directives.” Obtaining clarity that routine operating instructions do not constitute directives for purposes of administering compliance with the NERC Standards will help RCs, BAs and TOPs (as well</p>

as functional entities receiving such “directives”) to determine when the need exists for, and the conditions under which, an entity must adhere to Requirement R2 of COM-002 to complete a 3-part communication, and to make decisions about how to retain records that may assist Regional Entities in conducting investigations and/or audits of registered entities.

Second, some BAs utilize electronic dispatch instructions, during routine operations as well as during emergency operations, for more reliable and efficient dispatch of generating units. Through such systems, larger numbers of generators can be given dispatch instructions more quickly, and dispatch instructions can be given to effectuate small changes in generator output.

Changing communication protocols for day-to-day, non-emergency instructions may require operators to revisit how they communicate with other registered entities, which may reduce the reliability of the system.