

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:
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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:
Requirement Number and Text of Requirement: 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.
<u>Clarification needed:</u> Please clarify whether routine operating instructions are “directives” or whether “directives” are limited to actual and anticipated emergency operating conditions.
Identify the material impact associated with this interpretation:
Identify the material impact to your organization or others caused by the lack of clarity or an incorrect interpretation of this standard. There are at least two potential material impacts to registered entities caused by lack of clarity or an incorrect interpretation of this term. 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 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.

Project 2009-22: Response to Request for an Interpretation of NERC Standard COM-002-2 R2 for the ISO/RTO Council – Standards Review Committee

The following interpretation of NERC Standard COM-002-2 – Communications and Coordination R2 was developed by the Operating Personnel Communications Protocols Standard Drafting Team.

Requirement Number and Text of Requirement

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.

Question

Please clarify whether routine operating instructions are “directives” or whether “directives” are limited to actual and anticipated emergency operating conditions.

Response

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 during 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.

~~This requirement addresses verbal communication, so electronic communication would not fall under COM-002-2 R2.~~