

**Reliability Standard Audit Worksheet[[1]](#footnote-1)**

# COM-001-2.1 – Communications

***This section to be completed by the Compliance Enforcement Authority.***

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| **Audit ID:** | Audit ID if available; or REG-NCRnnnnn-YYYYMMDD |
| **Registered Entity:** | Registered name of entity being audited |
| **NCR Number:** | NCRnnnnn |
| **Compliance Enforcement Authority:** | Region or NERC performing audit |
| **Compliance Assessment Date(s)[[2]](#footnote-2):** | Month DD, YYYY, to Month DD, YYYY |
| **Compliance Monitoring Method:** | [On-site Audit | Off-site Audit | Spot Check] |
| **Names of Auditors:** | Supplied by CEA |

# **Applicability of Requirements**

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|  | **BA** | **DP** | **GO** | **GOP** | **IA** | **LSE** | **PA/PC** | **PSE** | **RC** | **RP** | **RSG** | **TO** | **TOP** | **TP** | **TSP** |
| **R1** |  |  |  |  |  |  |  |  | X |  |  |  |  |  |  |
| **R2** |  |  |  |  |  |  |  |  | X |  |  |  |  |  |  |
| **R3** |  |  |  |  |  |  |  |  |  |  |  |  | X |  |  |
| **R4** |  |  |  |  |  |  |  |  |  |  |  |  | X |  |  |
| **R5** | X |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| **R6** | X |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| **R7** |  | X |  |  |  |  |  |  |  |  |  |  |  |  |  |
| **R8** |  |  |  | X |  |  |  |  |  |  |  |  |  |  |  |
| **R9** | X |  |  |  |  |  |  |  | X |  |  |  | X |  |  |
| **R10** | X |  |  |  |  |  |  |  | X |  |  |  | X |  |  |
| **R11** |  | X |  | X |  |  |  |  |  |  |  |  |  |  |  |

**Legend:**

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| Text with blue background: | Fixed text – do not edit |
| Text entry area with Green background: | Entity-supplied information |
| Text entry area with white background: | Auditor-supplied information |

Findings

**(This section to be completed by the Compliance Enforcement Authority)**

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| **Req.** | **Finding** | **Summary and Documentation** | **Functions Monitored** |
| **R1** |  |  |  |
| **R2** |  |  |  |
| **R3** |  |  |  |
| **R4** |  |  |  |
| **R5** |  |  |  |
| **R6** |  |  |  |
| **R7** |  |  |  |
| **R8** |  |  |  |
| **R9** |  |  |  |
| **R10** |  |  |  |
| **R11** |  |  |  |

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| **Req.** | **Areas of Concern** |
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| **Req.** | **Recommendations** |
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| **Req.** | **Positive Observations** |
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Subject Matter Experts

Identify the Subject Matter Expert(s) responsible for this Reliability Standard.

**Registered Entity Response (Required; Insert additional rows if needed):**

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| **SME Name** | **Title** | **Organization** | **Requirement(s)** |
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R1 Supporting Evidence and Documentation

**R1.** Each Reliability Coordinator shall have Interpersonal Communication capability with the following entities (unless the Reliability Coordinator detects a failure of its Interpersonal Communication capability in which case Requirement R10 shall apply):

**1.1.** All Transmission Operators and Balancing Authorities within its Reliability Coordinator Area.

**1.2.** Each adjacent Reliability Coordinator within the same Interconnection.

**M1.** Each Reliability Coordinator shall have and provide upon request evidence that it has Interpersonal Communication capability with all Transmission Operators and Balancing Authorities within its Reliability Coordinator Area and with each adjacent Reliability Coordinator within the same Interconnection, which could include, but is not limited to:

* physical assets, or
* dated evidence, such as, equipment specifications and installation documentation, test records, operator logs, voice recordings, transcripts of voice recordings, or electronic communications.

**Registered Entity Response (Required):**

**Compliance Narrative:**

Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

Evidence Requested[[3]](#endnote-1):

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| **Provide the following evidence, or other evidence to demonstrate compliance.** |
| For all, or an auditor selected sample of 1) Transmission Operators and Balancing Authorities within the entity’s area, as well as 2) adjacent Reliability Coordinators within the same Interconnection, provide dated evidence, such as equipment specifications, installation documentation, test records, operator logs, voice recordings/transcripts, or electronic communications, of the entity’s Interpersonal Communication capability. |

Registered Entity Evidence (Required):

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| **The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.** | | | | | |
| **File Name** | **Document Title** | **Revision or Version** | **Document Date** | **Relevant Page(s) or Section(s)** | **Description of Applicability of Document** |
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Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

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Compliance Assessment Approach Specific to COM-001-2.1, R1

***This section to be completed by the Compliance Enforcement Authority***

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|  | (R1) Review evidence and verify the entity has Interpersonal Communication capability for all, or a sample of: |
|  | (Part 1.1) Transmission Operators and Balancing Authorities within the entity’s area. |
|  | (Part 1.2) Adjacent Reliability Coordinators within the entity’s Interconnection. |
| **Note to Auditor: If the entity** detects a failure of its Interpersonal Communication capability in the Compliance Monitoring Period, the auditor should evaluate the response in conjunction with R10. | |

Auditor Notes:

R2 Supporting Evidence and Documentation

**R2.** Each Reliability Coordinator shall designate an Alternative Interpersonal Communication capability with the following entities:

**2.1.** All Transmission Operators and Balancing Authorities within its Reliability Coordinator Area.

**2.2.**  Each adjacent Reliability Coordinator within the same Interconnection.

**M2.** Each Reliability Coordinator shall have and provide upon request evidence that it designated an Alternative Interpersonal Communication capability with all Transmission Operators and Balancing Authorities within its Reliability Coordinator Area and with each adjacent Reliability Coordinator within the same Interconnection, which could include, but is not limited to:

* physical assets, or
* dated evidence, such as, equipment specifications and installation documentation, test records, operator logs, voice recordings, transcripts of voice recordings, or electronic communications.

**Registered Entity Response (Required):**

**Compliance Narrative:**

Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

Evidence Requestedi:

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| **Provide the following evidence, or other evidence to demonstrate compliance.** |
| For all, or an auditor selected sample of 1) Transmission Operators and Balancing Authorities within the entity’s area, as well as 2) adjacent Reliability Coordinators within the same Interconnection, provide dated evidence, such as equipment specifications, installation documentation, test records, operator logs, voice recordings/transcripts, or electronic communications, that the entity designated an Alternative Interpersonal Communication capability. |

Registered Entity Evidence (Required):

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| **The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.** | | | | | |
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Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

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Compliance Assessment Approach Specific to COM-001-2.1, R2

***This section to be completed by the Compliance Enforcement Authority***

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|  | (R2) Review evidence and verify the entity designated an Alternative Interpersonal Communication capability for all, or a sample of: |
|  | (Part 2.1) Transmission Operators and Balancing Authorities within the entity’s area. |
|  | (Part 2.2) Adjacent Reliability Coordinators within the entity’s Interconnection. |
| **Note to Auditor:** | |

Auditor Notes:

R3 Supporting Evidence and Documentation

**R3**. Each Transmission Operator shall have Interpersonal Communication capability with the following entities (unless the Transmission Operator detects a failure of its Interpersonal Communication capability in which case Requirement R10 shall apply):

**3.1.**  Its Reliability Coordinator.

**3.2.** Each Balancing Authority within its Transmission Operator Area.

**3.3.** Each Distribution Provider within its Transmission Operator Area.

**3.4.** Each Generator Operator within its Transmission Operator Area.

**3.5.** Each adjacent Transmission Operator synchronously connected.

**3.6.** Each adjacent Transmission Operator asynchronously connected.

**M3.** Each Transmission Operator shall have and provide upon request evidence that it has Interpersonal Communication capability with its Reliability Coordinator, each Balancing Authority, Distribution Provider, and Generator Operator within its Transmission Operator Area, and each adjacent Transmission Operator asynchronously or synchronously connected, which could include, but is not limited to:

* physical assets, or
* dated evidence, such as, equipment specifications and installation documentation, test records, operator logs, voice recordings, transcripts of voice recordings, or electronic communication.

**Registered Entity Response (Required):**

**Compliance Narrative:**

Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

Evidence Requestedi:

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| **Provide the following evidence, or other evidence to demonstrate compliance.** |
| For all, or an auditor selected sample, of 1) the entity’s Reliability Coordinator, 2) Balancing Authorities within the entity’s area, 3) Distribution Providers within the entity’s area, 4) Generator Operators within the entity’s area, 5) adjacent Transmission Operators synchronously connected to the entity, and 6) adjacent Transmission Operators asynchronously connected to the entity, provide dated evidence, such as equipment specifications, installation documentation, test records, operator logs, voice recordings/transcripts, or electronic communication, of Interpersonal Communication capability. |

Registered Entity Evidence (Required):

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| **The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.** | | | | | |
| **File Name** | **Document Title** | **Revision or Version** | **Document Date** | **Relevant Page(s) or Section(s)** | **Description of Applicability of Document** |
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Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

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Compliance Assessment Approach Specific to COM-001-2.1, R3

***This section to be completed by the Compliance Enforcement Authority***

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|  | (R3) Review evidence and verify the entity has Interpersonal Communication capability for all, or a sample of: |
|  | (Part 3.1) The entity’s Reliability Coordinator. |
|  | (Part 3.2) Balancing Authorities within the entity’s Area. |
|  | (Part 3.3) Distribution Providers within the entity’s Area. |
|  | (Part 3.4) Generator Operators within the entity’s Area. |
|  | (Part 3.5) Adjacent Transmission Operators synchronously connected to the entity. |
|  | (Part 3.6) Adjacent Transmission Operators asynchronously connected to the entity. |
| **Note to Auditor: If the entity** detects a failure of its Interpersonal Communication capability in the Compliance Monitoring Period, the auditor should evaluate the response in conjunction with R10. | |

Auditor Notes:

R4 Supporting Evidence and Documentation

**R4**. Each Transmission Operator shall designate an Alternative Interpersonal Communication capability with the following entities:

**4.1.**  Its Reliability Coordinator.

**4.2.**  Each Balancing Authority within its Transmission Operator Area.

**4.3.** Each adjacent Transmission Operator synchronously connected.

**4.4.**  Each adjacent Transmission Operator asynchronously connected.

**M4.**  Each Transmission Operator shall have and provide upon request evidence that it designated an Alternative Interpersonal Communication capability with its Reliability Coordinator, each Balancing Authority within its Transmission Operator Area, and each adjacent Transmission Operator asynchronously and synchronously connected, which could include, but is not limited to:

* physical assets, or
* dated evidence, such as, equipment specifications and installation documentation, test records, operator logs, voice recordings, transcripts of voice recordings, or electronic communications.

**Registered Entity Response (Required):**

**Compliance Narrative:**

Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

Evidence Requestedi:

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| **Provide the following evidence, or other evidence to demonstrate compliance.** |
| For all, or an auditor selected sample, of 1) the entity’s Reliability Coordinator, 2) Balancing Authorities within the entity’s area, 3) adjacent Transmission Operators synchronously connected to the entity, and 4) adjacent Transmission Operators asynchronously connected to the entity, provide dated evidence, such as equipment specifications, installation documentation, test records, operator logs, voice recordings/transcripts, or electronic communications, that the entity designated an Alternative Interpersonal Communication capability. |

Registered Entity Evidence (Required):

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| **The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.** | | | | | |
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Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

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Compliance Assessment Approach Specific to COM-001-2.1, R4

***This section to be completed by the Compliance Enforcement Authority***

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|  | (R4) Review evidence and verify the entity designated an Alternative Interpersonal Communication capability for all, or a sample of: |
|  | (Part 4.1) The entity’s Reliability Coordinator. |
|  | (Part 4.2) Balancing Authorities within the entity’s Area. |
|  | (Part 4.3) Adjacent Transmission Operators synchronously connected to the entity. |
|  | (Part 4.4) Adjacent Transmission Operators asynchronously connected to the entity. |
| **Note to Auditor:** | |

Auditor Notes:

R5 Supporting Evidence and Documentation

**R5**. Each Balancing Authority shall have Interpersonal Communication capability with the following entities (unless the Balancing Authority detects a failure of its Interpersonal Communication capability in which case Requirement R10 shall apply):

**5.1.** Its Reliability Coordinator.

**5.2.** Each Transmission Operator that operates Facilities within its Balancing Authority Area.

**5.3.** Each Distribution Provider within its Balancing Authority Area.

**5.4.** Each Generator Operator that operates Facilities within its Balancing Authority Area.

**5.5.** Each Adjacent Balancing Authority.

**M5.** Each Balancing Authority shall have and provide upon request evidence that it has Interpersonal Communication capability with its Reliability Coordinator, each Transmission Operator and Generator Operator that operates Facilities within its Balancing Authority Area, each Distribution Provider within its Balancing Authority Area, and each adjacent Balancing Authority, which could include, but is not limited to:

* physical assets, or
* dated evidence, such as, equipment specifications and installation documentation, test records, operator logs, voice recordings, transcripts of voice recordings, or electronic communication.

**Registered Entity Response (Required):**

**Compliance Narrative:**

Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

Evidence Requestedi:

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| **Provide the following evidence, or other evidence to demonstrate compliance.** |
| For all, or an auditor selected sample, of 1) the entity’s Reliability Coordinator, 2) Transmission Operators that operate Facilities within the entity’s area, 3) Distribution Providers within the entity’s area, 4) Generator Operators that operate Facilities within the entity’s area, and 5) adjacent Balancing Authorities, provide dated evidence, such as equipment specifications, installation documentation, test records, operator logs, voice recordings/transcripts, or electronic communications, of Interpersonal Communication capability. |

Registered Entity Evidence (Required):

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| **The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.** | | | | | |
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Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

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Compliance Assessment Approach Specific to COM-001-2.1, R5

***This section to be completed by the Compliance Enforcement Authority***

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|  | (R5) Review evidence and verify the entity has Interpersonal Communication capability for all, or a sample of: |
|  | (Part 5.1) The entity’s Reliability Coordinator. |
|  | (Part 5.2) Transmission Operators that operate Facilities within the entity’s Area. |
|  | (Part 5.3) Distribution Providers within the entity’s Area. |
|  | (Part 5.4) Generator Operators that operate Facilities within the entity’s Area. |
|  | (Part 5.5) Adjacent Balancing Authorities. |
| **Note to Auditor: If the entity** detects a failure of its Interpersonal Communication capability in the Compliance Monitoring Period, the auditor should evaluate the response in conjunction with R10. | |

Auditor Notes:

R6 Supporting Evidence and Documentation

**R6**. Each Balancing Authority shall designate an Alternative Interpersonal Communication capability with the following entities:

**6.1.** Its Reliability Coordinator.

**6.2.** Each Transmission Operator that operates Facilities within its Balancing Authority Area.

**6.3.** Each Adjacent Balancing Authority.

**M6.**  Each Balancing Authority shall have and provide upon request evidence that it designated an Alternative Interpersonal Communication capability with its Reliability Coordinator, each Transmission Operator that operates Facilities within its Balancing Authority Area, and each adjacent Balancing Authority, which could include, but is not limited to:

* physical assets, or
* dated evidence, such as, equipment specifications and installation documentation, test records, operator logs, voice recordings, transcripts of voice recordings, or electronic communication.

**Registered Entity Response (Required):**

**Compliance Narrative:**

Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

Evidence Requestedi:

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| **Provide the following evidence, or other evidence to demonstrate compliance.** |
| For all, or an auditor selected sample, of 1) the entity’s Reliability Coordinator, 2) Transmission Operators that operate Facilities within the entity’s area, and 3) adjacent Balancing Authorities, provide dated evidence, such as equipment specifications, installation documentation, test records, operator logs, voice recordings/transcripts, or electronic communications, that the entity designated an Alternative Interpersonal Communication capability. |

Registered Entity Evidence (Required):

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| **The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.** | | | | | |
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Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

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Compliance Assessment Approach Specific to COM-001-2.1, R6

***This section to be completed by the Compliance Enforcement Authority***

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|  | (R6) Review evidence and verify the entity designated an Alternative Interpersonal Communication capability for all, or a sample of: |
|  | (Part 6.1) The entity’s Reliability Coordinator. |
|  | (Part 6.2) Transmission Operators that operate Facilities within the entity’s Area. |
|  | (Part 6.3) Adjacent Balancing Authorities. |
| **Note to Auditor:** | |

Auditor Notes:

R7 Supporting Evidence and Documentation

**R7.** Each Distribution Provider shall have Interpersonal Communication capability with the following entities (unless the Distribution Provider detects a failure of its Interpersonal Communication capability in which case Requirement R11 shall apply):

**7.1.** Its Balancing Authority.

**7.2.** Its Transmission Operator.

**M7.** Each Distribution Provider shall have and provide upon request evidence that it has Interpersonal Communication capability with its Transmission Operator and its Balancing Authority, which could include, but is not limited to:

* physical assets, or
* dated evidence, such as, equipment specifications and installation documentation, test records, operator logs, voice recordings, transcripts of voice recordings, or electronic communications.

**Registered Entity Response (Required):**

**Compliance Narrative:**

Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

Evidence Requestedi:

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| **Provide the following evidence, or other evidence to demonstrate compliance.** |
| For the entity’s 1) Balancing Authority and 2) Transmission Operator, provide dated evidence, such as equipment specifications, installation documentation, test records, operator logs, voice recordings/transcripts, or electronic communications, of Interpersonal Communication capability. |

Registered Entity Evidence (Required):

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| **The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.** | | | | | |
| **File Name** | **Document Title** | **Revision or Version** | **Document Date** | **Relevant Page(s) or Section(s)** | **Description of Applicability of Document** |
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Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

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Compliance Assessment Approach Specific to COM-001-2.1, R7

***This section to be completed by the Compliance Enforcement Authority***

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|  | (R7) Review evidence and verify the entity has Interpersonal Communication capability for: |
|  | (Part 7.1) The entity’s Balancing Authority. |
|  | (Part 7.2) The entity’s Transmission Operator. |

Auditor Notes:

R8 Supporting Evidence and Documentation

**R8.** Each Generator Operator shall have Interpersonal Communication capability with the following entities (unless the Generator Operator detects a failure of its Interpersonal Communication capability in which case Requirement R11 shall apply):

**8.1.** Its Balancing Authority.

**8.2.** Its Transmission Operator.

**M8.** Each Generator Operator shall have and provide upon request evidence that it has Interpersonal Communication capability with its Balancing Authority and its Transmission Operator, which could include, but is not limited to:

* physical assets, or
* dated evidence, such as, equipment specifications and installation documentation, test records, operator logs, voice recordings, transcripts of voice recordings, or electronic communications.

**Registered Entity Response (Required):**

**Compliance Narrative:**

Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

Evidence Requestedi:

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| **Provide the following evidence, or other evidence to demonstrate compliance.** |
| For the entity’s 1) Balancing Authority and 2) Transmission Operator, provide dated evidence, such as equipment specifications, installation documentation, test records, operator logs, voice recordings/transcripts, or electronic communications, of Interpersonal Communication capability. |

Registered Entity Evidence (Required):

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| **The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.** | | | | | |
| **File Name** | **Document Title** | **Revision or Version** | **Document Date** | **Relevant Page(s) or Section(s)** | **Description of Applicability of Document** |
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Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

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Compliance Assessment Approach Specific to COM-001-2.1, R8

***This section to be completed by the Compliance Enforcement Authority***

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|  | (R8) Review evidence and verify the entity has Interpersonal Communication capability for: |
|  | (Part 8.1) The entity’s Balancing Authority. |
|  | (Part 8.2) The entity’s Transmission Operator. |
| **Note to Auditor: If the entity** detects a failure of its Interpersonal Communication capability in the Compliance Monitoring Period, the auditor should evaluate the response in conjunction with R11. | |

Auditor Notes:

R9 Supporting Evidence and Documentation

**R9.** Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall test its Alternative Interpersonal Communication capability at least once each calendar month. If the test is unsuccessful, the responsible entity shall initiate action to repair or designate a replacement Alternative Interpersonal Communication capability within 2 hours.

**M9.** Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall have and provide upon request evidence that it tested, at least once each calendar month, its Alternative Interpersonal Communication capability designated in Requirements R2, R4, or R6. If the test was unsuccessful, the entity shall have and provide upon request evidence that it initiated action to repair or designated a replacement Alternative Interpersonal Communication capability within 2 hours. Evidence could include, but is not limited to: dated and time-stamped test records, operator logs, voice recordings, transcripts of voice recordings, or electronic communications.

**Registered Entity Response (Required):**

**Question:** Did the entity have an unsuccessful test of its Alternative Interpersonal Communication capability during the compliance monitoring period?  Yes  No

[If Yes, provide a list of instances of unsuccessful Alternative Interpersonal Communication tests and proceed to the Compliance Narrative section below. If No, proceed to the Compliance Narrative section below.]

[Note: A separate spreadsheet or other document may be used. If so, provide the document reference below.]

**Registered Entity Response (Required):**

**Compliance Narrative:**

Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

Evidence Requestedi:

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| **Provide the following evidence, or other evidence to demonstrate compliance.** |
| For an auditor selected sample of monthly Alternative Interpersonal Communication capability tests with all, or an auditor selected sample of, applicable entities (identified in Requirements R2, R4, or R6), provide dated and time-stamped evidence, such as test records, operator logs, voice recordings/transcripts, or electronic communications, that the entity’s Alternative Interpersonal Communication capability was tested at least once each calendar month. |
| For all, or an auditor selected sample of unsuccessful Alternative Interpersonal Communication tests, provide dated and time-stamped evidence, such as test records, operator logs, voice recordings/transcripts, or electronic communications, that action was initiated to repair or designate a replacement Alternative Interpersonal Communication capability within 2 hours. |

Registered Entity Evidence (Required):

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| **The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.** | | | | | |
| **File Name** | **Document Title** | **Revision or Version** | **Document Date** | **Relevant Page(s) or Section(s)** | **Description of Applicability of Document** |
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Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

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Compliance Assessment Approach Specific to COM-001-2.1, R9

***This section to be completed by the Compliance Enforcement Authority***

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|  | For a sample, review evidence and verify the entity tested the designated Alternative Interpersonal Communication capability at least once each calendar month. |
|  | For all, or a sample, review evidence and verify that, for any unsuccessful Alternative Interpersonal Communication capability tests, the entity initiated action to repair or designated a replacement Alternative Interpersonal Communication capability within 2 hours. |
| **Note to Auditor:** Each Alternative Interpersonal Communication capability is to be verified functional by testing. | |

Auditor Notes:

R10 Supporting Evidence and Documentation

**R10.** Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall notify entities as identified in Requirements R1, R3, and R5, respectively within 60 minutes of the detection of a failure of its Interpersonal Communication capability that lasts 30 minutes or longer.

**M10.** Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall have and provide upon request evidence that it notified entities as identified in Requirements R1, R3, and R5, respectively within 60 minutes of the detection of a failure of its Interpersonal Communication capability that lasted 30 minutes or longer. Evidence could include, but is not limited to: dated and time-stamped test records, operator logs, voice recordings, transcripts of voice recordings, or electronic communications.

**Registered Entity Response (Required):**

**Question:** Did the entity experience a failure of its Interpersonal Communication capability, as identified in Requirements R1, R3 and R5, that lasted longer than 30 minutes during the compliance monitoring period?  Yes  No

[If Yes, provide a list of instances of Interpersonal Communication failures that lasted 30 minutes or longer and proceed to the Compliance Narrative section below. If No, then proceed to the Compliance Narrative section below.]

[Note: A separate spreadsheet or other document may be used. If so, provide the document reference below.]

**Registered Entity Response (Required):**

**Compliance Narrative:**

Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

Evidence Requestedi:

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| **Provide the following evidence, or other evidence to demonstrate compliance.** |
| For all, or an auditor selected sample of, R1, R3 and R5 Interpersonal Communication capability failures that lasted longer than 30 minutes, provide dated and time-stamped evidence, such as test records, operator logs, voice recordings/transcripts, or electronic communications that the entity notified the appropriate entities (identified in Requirements R1, R3, or R5) within 60 minutes of detecting the failure. |

Registered Entity Evidence (Required):

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| **The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.** | | | | | |
| **File Name** | **Document Title** | **Revision or Version** | **Document Date** | **Relevant Page(s) or Section(s)** | **Description of Applicability of Document** |
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Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

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Compliance Assessment Approach Specific to COM-001-2.1, R10

***This section to be completed by the Compliance Enforcement Authority***

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|  | For all, or a sample of R1, R3 and R5 Interpersonal Communication capability failures that lasted 30 minutes or longer, review evidence and verify that the entity provided notification to the appropriate entities within 60 minutes of detecting the failure. |
| **Note to Auditor:** The “within 60 minutes of detecting a failure” measurement starts after the 30 minute threshold. | |

Auditor Notes:

R11 Supporting Evidence and Documentation

**R11.** Each Distribution Provider and Generator Operator that detects a failure of its Interpersonal Communication capability shall consult each entity affected by the failure, as identified in Requirement R7 for a Distribution Provider or Requirement R8 for a Generator Operator, to determine a mutually agreeable action for the restoration of its Interpersonal Communication capability.

**M11.** Each Distribution Provider and Generator Operator that detected a failure of its Interpersonal Communication capability shall have and provide upon request evidence that it consulted with each entity affected by the failure, as identified in Requirement R7 for a Distribution Provider or Requirement R8 for a Generator Operator, to determine mutually agreeable action to restore the Interpersonal Communication capability. Evidence could include, but is not limited to: dated operator logs, voice recordings, transcripts of voice recordings, or electronic communications.

**Registered Entity Response (Required):**

**Question:** Did the entity detect a failure of its Interpersonal Communication capability, as identified in Requirements R7 and R8, during the compliance monitoring period?  Yes  No

[If Yes, provide a list of instances of Interpersonal Communication failures and proceed to the Compliance Narrative section below. If No, then proceed to the Compliance Narrative section below.]

[Note: A separate spreadsheet or other document may be used. If so, provide the document reference below.]

**Registered Entity Response (Required):**

**Compliance Narrative:**

Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

Evidence Requestedi:

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| **Provide the following evidence, or other evidence to demonstrate compliance.** |
| For all, or an auditor selected sample of, R7 and R8 Interpersonal Communication capability failures, provide dated evidence, such as operator logs, voice recordings/transcripts, or electronic communications, that 1) the entity consulted with each appropriate entity affected by the failure, as well as 2) that a mutually agreeable action to restore the Interpersonal Communication capability was determined. |

Registered Entity Evidence (Required):

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| **The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.** | | | | | |
| **File Name** | **Document Title** | **Revision or Version** | **Document Date** | **Relevant Page(s) or Section(s)** | **Description of Applicability of Document** |
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Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

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Compliance Assessment Approach Specific to COM-001-2.1, R11

***This section to be completed by the Compliance Enforcement Authority***

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|  | For all, or a sample of R7 and R8 Interpersonal Communication capability failures, review evidence and verify that the entity consulted the appropriate entities affected by the failure. |
|  | For all, or a sample of R7 and R8 Interpersonal Communication capability failures, review evidence and verify that the entity determined a mutually agreeable action to restore its Interpersonal Communication capability. |
| **Note to Auditor:** | |

Auditor Notes:

Additional Information:



Reliability Standard

The full text of COM-001-2 may be found on the NERC Web Site (www.nerc.com) under “Program Areas & Departments”, “Reliability Standards.”

In addition to the Reliability Standard, there is an applicable Implementation Plan available on the NERC Web Site.

In addition to the Reliability Standard, there is background information available on the NERC Web Site.

Capitalized terms in the Reliability Standard refer to terms in the NERC Glossary, which may be found on the NERC Web Site.

Sampling Methodology

Sampling is essential for auditing compliance with NERC Reliability Standards since it is not always possible

or practical to test 100% of either the equipment, documentation, or both, associated with the full suite of enforceable standards. The Sampling Methodology Guidelines and Criteria (see NERC website), or sample guidelines, provided by the Electric Reliability Organization help to establish a minimum sample set for monitoring and enforcement uses in audits of NERC Reliability Standards.

Regulatory Language

Regulatory Background

The Commission approved Reliability Standard COM-001-1 in [Order No. 693](http://www.nerc.com/FilingsOrders/us/FERCOrdersRules/ORDER%20693.pdf).[[4]](#footnote-3) In addition, the Commission directed NERC to develop modifications to COM-001-1 to: (1) expand the applicability of the standard to include generator operators and distribution providers, (2) identify specific requirements for telecommunications facilities for use in normal and emergency conditions that reflect the roles of the applicable entities, and (3) include adequate flexibility for compliance to allow for the adoption of new technologies and cost-effective solutions. NERC initiated Project 2006-06 to address the Order No. 693 directives related to Reliability Standards COM-001 and COM-002, resulting in two Standards, COM-001-2 and COM-002-3.

The Commission approved COM-001-2 in [Order No. 808](http://www.nerc.com/FilingsOrders/us/FERCOrdersRules/Order%20No.%20808%20Approving%20Reliability%20Standards%20COM-001-2%20and%20COM-002-4.pdf).[[5]](#footnote-4) Reliability Standard COM-001-2 is intended to establish a clear set of requirements for the communications capabilities that applicable functional entities must have in place and maintain. In addition, the Commission directed NERC to develop a modification to COM-001-2 that addresses internal communications capabilities that could involve the issuance or receipt of Operating Instructions or other communications that could have an impact on reliability. Below are the Commission’s comments regarding: the applicability of the Standard to Generator Owners and Transmission Owners; internal communication capability; testing requirements for Distribution Providers and Generator Operators; and the definitions of Interpersonal Communication and Alternative Interpersonal Communication.

**Applicability to Generator Owners and Transmission Owners**

P 35. While several commenters acknowledged that Transmission Owners and Generator Owners can receive and act on Operating Instructions in certain regions, the Commission held that COM-001-2 need not be expanded to include those entities at this time. The Commission was persuaded by the explanation of NERC that “[w]hile the Transmission Operator or Generator Operator may delegate tasks under the proposed Reliability Standards to other member entities within [an RTO or ISO], the Transmission Operator and Generator Operator retain responsibility for compliance with the Requirements in the proposed Reliability Standards.” Moreover, the Commission relied on NERC’s explanation that NERC and Regional Entity auditors examine contractual arrangements “to ascertain how tasks are delegated and to determine whether there are gaps in performance . . . as a result of the delegation. Responsibility will always rest with the entity registered with NERC as the Transmission Operator.” Thus, in the PJM example, if a transmission owner with delegated operating responsibilities fails to use three-part communication as required under COM-002-4, the registered entity that has delegated the operating responsibilities will remain responsible for the violation.

**Internal Communication Capability**

P 40. The Commission found that COM-001-2 applies to communications between functional entities within a single organization. For example, COM-001-2, Requirement R3, provides that “each Transmission Operator shall have Interpersonal Communication capability” with the Reliability Coordinator, and each Balancing Authority, Distribution Provider, and Generator Operator “within its Transmission Operator Area.” The Commission stated that a reasonable understanding of Requirement R3 is that the Transmission Operator must have Interpersonal Communication capability with a Balancing Authority, Distribution Provider and/or Generator Operator within the same organization. Moreover, the Commission indicated that the COM-001-2 Requirements concerning Alternative Interpersonal Communication only apply when those communications are performed by means other than direct, face-to-face situations.

P 41. The Commission noted that the application of COM-001-2 to different functional entities within the same organization, as discussed above, does not fully address its concern set forth in the NOPR regarding internal communications. In particular, the NOPR explained that Requirement R1.1 of currently-effective COM-001-1.1 provides that each Reliability Coordinator, Transmission Operator, and Balancing Authority “shall provide adequate and reliable telecommunication facilities for the exchange of Interconnection and operating information . . . internally.” This Requirement applies more broadly to internal communications, including internal communications within the same functional entity. Thus, unlike COM-001-1, COM-001-2 does not address the adequacy of internal telecommunications (or other internal communication systems) that may have an adverse effect on reliability, even within a single functional entity, including: (1) communications between geographically separate control centers within the same functional entity; and (2) communications between a control center and field personnel. These scenarios present a gap in reliability of the Bulk-Power System that NERC should address. Accordingly, pursuant to section 215(d)(5) of the FPA, the Commission directed NERC to develop modifications to COM-001-2, or to develop a new standard, to address its concerns regarding ensuring the adequacy of internal communications capability whenever internal communications could directly affect the reliable operation of the Bulk-Power System.

**Testing Requirements for Distribution Providers and Generator Operators**

P 44. The Commission found that additional testing requirements for Distribution Providers and Generator Operators are not necessary at this time. NERC and other commenters assert that the primary Interpersonal Communication systems used by a distribution provider or generator operator will effectively be tested through routine use, and that any potential failures in a given generator operator or distribution provider’s external communication system will not have a substantial impact on the Bulk-Power System. In light of this explanation, as well as its recognition in Order No. 693 that telecommunication requirements for applicable entities will vary according to their roles, the Commission declined to require any additional testing requirements for Distribution Providers and Generator Operators at this time.

**Definition of Interpersonal Communication and Alternative Interpersonal Communication**

P 45-46. In the NOPR, the Commission sought clarification on the intended scope of the newly defined terms Interpersonal Communication and Alternative Interpersonal. The Commission raised two concerns about the new terms as used in proposed Reliability Standard COM-001-2. First, the Commission noted that the definitions do not state a minimum expectation of communication performance, such as speed and quality. Second, the Commission asked for clarification as to whether Interpersonal Communication includes mediums used directly to exchange or transfer data, which communications appear to be covered under the currently-approved version of COM-001.

P 53. The Commission stated that it was satisfied that technical specifications regarding minimum levels of performance for the mediums used to satisfy the requirements of COM-001-2 are not necessary at this time. In doing so, the Commission noted NERC’s explanation that the requirements in COM-001-2 are “absolute” and that entities must “have the capability in place to ‘establish Interpersonal Communication capabilities necessary to maintain reliability.’” Moreover, the Commission indicated that setting performance criteria for the email and telephonic communications at issue here is both impractical and unnecessary.

P 54. The Commission did not make any determinations regarding data exchange capability. Noting that NERC stated that data exchange capability is being addressed in proposed IRO and TOP Standards in Docket No. RM15-15-000, the Commission stated that it will address any issues regarding data exchange capability in the pending rulemaking pertaining to NERC’s proposed TOP and IRO Reliability Standards.

Selected Glossary Terms

The following Glossary terms are provided for convenience only. Please refer to the NERC web site for the current enforceable terms.

**Interpersonal Communication** - Any medium that allows two or more individuals to interact, consult, or exchange information.

**Alternative Interpersonal Communication** - Any Interpersonal Communication that is able to serve as a substitute for, and does not utilize the same infrastructure (medium) as, Interpersonal Communication used for day-to- day operation.

Revision History for RSAW

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| **Version** | **Date** | **Reviewers** | **Revision Description** |
| 1 | 08/07/2015 | RSAW Task Force, NERC Compliance Assurance | New Document |
| 2 | 5/22/2017 | RSAW Task Force, NERC Compliance Assurance | Updated to reflect newest version of Standard |
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1. NERC developed this Reliability Standard Audit Worksheet (RSAW) language in order to facilitate NERC’s and the Regional Entities’ assessment of a registered entity’s compliance with this Reliability Standard. The NERC RSAW language is written to specific versions of each NERC Reliability Standard. Entities using this RSAW should choose the version of the RSAW applicable to the Reliability Standard being assessed. While the information included in this RSAW provides some of the methodology that NERC has elected to use to assess compliance with the requirements of the Reliability Standard, this document should not be treated as a substitute for the Reliability Standard or viewed as additional Reliability Standard requirements. In all cases, the Regional Entity should rely on the language contained in the Reliability Standard itself, and not on the language contained in this RSAW, to determine compliance with the Reliability Standard. NERC’s Reliability Standards can be found on NERC’s website. Additionally, NERC Reliability Standards are updated frequently, and this RSAW may not necessarily be updated with the same frequency. Therefore, it is imperative that entities treat this RSAW as a reference document only, and not as a substitute or replacement for the Reliability Standard. It is the responsibility of the registered entity to verify its compliance with the latest approved version of the Reliability Standards, by the applicable governmental authority, relevant to its registration status.

   The NERC RSAW language contained within this document provides a non‑exclusive list, for informational purposes only, of examples of the types of evidence a registered entity may produce or may be asked to produce to demonstrate compliance with the Reliability Standard. A registered entity’s adherence to the examples contained within this RSAW does not necessarily constitute compliance with the applicable Reliability Standard, and NERC and the Regional Entity using this RSAW reserves the right to request additional evidence from the registered entity that is not included in this RSAW. Additionally, this RSAW includes excerpts from FERC Orders and other regulatory references. The FERC Order cites are provided for ease of reference only, and this document does not necessarily include all applicable Order provisions. In the event of a discrepancy between FERC Orders, and the language included in this document, FERC Orders shall prevail. [↑](#footnote-ref-1)
2. Compliance Assessment Date(s): The date(s) the actual compliance assessment (on-site audit, off-site spot check, etc.) occurs. [↑](#footnote-ref-2)
3. Items in the Evidence Requested section are suggested evidence that may, but will not necessarily, demonstrate compliance. These items are not mandatory and other forms and types of evidence may be submitted at the entity’s discretion. [↑](#endnote-ref-1)
4. *See Mandatory Reliability Standards for the Bulk-Power System*, Order No. 693, FERC Stats. & Regs. ¶ 31,242 at P 508, *order on reh’g*, Order No. 693-A, 120 FERC ¶ 61,053 (2007); *see also North American Electric Reliability Corp.*, Docket No. RD09-2-000 (2009) (delegated letter order accepting Reliability Standard COM-001-1.1). [↑](#footnote-ref-3)
5. *Communications Reliability Standards*, Order No. 808, 151 FERC ¶ 61,039 (2015). [↑](#footnote-ref-4)