

COM-002-4 Operating Personnel Communications Protocols

January 17, 2014

RELIABILITY | ACCOUNTABILITY



- Introductory Remarks
- Purpose
- Background
- COM-002-4 Requirements
- Implementation Plan
- Compliance
- VSL/VRF by Requirement
- Next Steps
- FAQs

- To improve communications for the issuance of Operating Instructions with predefined communications protocols to reduce the possibility of miscommunication that could lead to action or inaction harmful to the reliability of the Bulk Electric System (BES).

NERC Board of Trustees Nov, 7 2013 Resolution

- Directed combining COM-002-3 and COM-003-1
- Referred to OC Guideline on communications
- Essential protocols must be included
- Requires training and periodic review
- Requires entity self assessment, with necessary correction
- Requires adherence to protocols in emergencies without exception
- For non-emergencies, compliance only entails whether entity:
 - Adopts protocols
 - Trains and review communication
 - Self assess effectiveness and self identify changes
 - Provide feedback to operators

In developing Posting 8 of Project 2007-02 the Drafting Team incorporated input from the following sources:

- NERC Board of Trustees Nov, 7 2013 Resolution
 - Directed requirements that include training, periodic review, and self assessments by entities of communication protocols
 - Maintained entities held accountable for miscommunication during Emergencies without exception
- 2003 Blackout Report Recommendation 26
 - Tighten communications protocols, especially for communications during alerts and emergencies
- FERC Order 693 directives on COM-002
 - Add Distribution Providers
 - Require the Electric Reliability Organization (ERO) to establish tightened communications protocols, especially for communications during alerts and emergencies

- COM-002-3 and COM-003-1 development
- Consultation with PER, RTO, and RC SDTs
- Comments/feedback from industry stakeholders collected during previous postings
- Surveys of industry experts

- Operating Instruction — A command by operating personnel responsible for the Real-time operation of the interconnected Bulk Electric System to change or preserve the state, status, output, or input of an Element of the Bulk Electric System or Facility of the Bulk Electric System. (A discussion of general information and of potential options or alternatives to resolve Bulk Electric System operating concerns is not a command and is not considered an Operating Instruction.)

- Applies to Balancing Authorities, Reliability Coordinators, and Transmission Operators
- Requires minimum set of protocols that must be included in documented communications protocols.
 - Use of English language
 - Three-part oral communications
 - Take an alternative action if needed
 - Nomenclature for interface Elements and Facilities
 - Specify when time identification required
 - Confirm receipt of single or multi-party burst message

- Allows entities the flexibility to specify additional protocols deemed necessary, but promotes uniformity in protocols
- Entities can draw on Operating Committee Guideline on communications for additional protocols
- Evidence of Compliance: Copy of documented communication protocols

- Requirement R2: Applies to Balancing Authorities, Reliability Coordinators, and Transmission Operators
 - Requires initial training for each of an entity's operating personnel on documented communication protocols as developed in R1.
- Requirement R3: Applies to Distribution Providers and Generator Operators
 - Requires initial training for each of an entity's operating personnel before the operator can receive an Operating Instruction
- Evidence of Compliance: may include, not limited to: attendance logs, learning objectives, training records

- Requirement R4 applies to Balancing Authorities, Reliability Coordinators, and Transmission Operators
 - Requires entities to assess operator adherence to protocols, provide feedback and address deviations from the protocols.
 - Requires self assessments by entity of the effectiveness of its written communication protocols
- Evidence of Compliance: may include, not limited to: Documents, memorandums, spreadsheets, logs of assessments of operator performance, records of corrective actions taken where operator non-adherence to protocols was sole or partial cause of an Emergency. Documentation of any changes made to protocols.

- Requirement R5: Applies to Balancing Authorities, Reliability Coordinators, and Transmission Operators
 - Requires use of three-part communication for issuers of Operating Instructions during Emergency without exception
 - Requires issuer to take an alternative action if no response is received or if the Operating Instruction is not understood.
- Requirement R6: Applies to Balancing Authorities, Transmission Operators, Generator Operators and Distribution Providers
 - Requires use of three-part communication for recipients of Operating Instructions during Emergency without exception
- Evidence of Compliance: may include, not limited to: dated and time stamped voice recordings, transcripts of voice recordings, operator logs, attestations

- Requirement R7: Applies to Balancing Authorities, Reliability Coordinators, and Transmission Operators
 - Requires issuer of a written or oral single to multi-party burst message during an Emergency to confirm receipt by at least one receiver
- Evidence of Compliance: may include, not limited to: dated and time stamped voice recordings, transcripts, operator logs, electronic records, memos

- Approval:
 - COM-002-4 – Operating Personnel Communications Protocols
 - Definition of Operating Instruction as well as addition to NERC Glossary of Terms
- Prerequisite Approval:
 - None
- Retirements:
 - COM-001-1.1 Requirement R4 – Telecommunications
 - COM-002-2 – Communication and Coordination
 - COM-002-3 – Communication and Coordination

- Data Retention
 - One Calendar Year for evidence demonstrating compliance for each applicable requirement
 - Except for Voice Recordings, which are required to be kept for 90 days

VRF/VSL Range by Requirement

Requirement	VRF	VSL Range
1	Low	Low to Severe
2	Low	High to Severe
3	Low	High to Severe
4	Medium	Low to Severe
5	High	Moderate, Severe
6	High	Moderate, Severe
7	High	Moderate, Severe

- **Board Resolution**

FURTHER RESOLVED, that NERC management is hereby directed to prepare a draft Reliability Standards Audit Worksheet and any other documentation necessary and appropriate consistent with the foregoing compliance/enforcement approach that will address concepts on how compliance will be addressed that should be posted with the draft combined standard.

- RSAW is posted with COM-002-4 for comment

- January 22nd – 31st: Ballot and Non-binding Poll
- February 7th : NERC Board of Trustees Meeting
- February: Final Ballot

- Why was the term “Reliability Directive” removed from the definition of Operating Instruction?
- Why is there an initial training requirement? Couldn't this be covered in the PER standard?
- Why are GOPs and DPs included as applicable entities?
- What does a DP show compliance if it does not have recording equipment?
- Is this a zero tolerance standard?



Questions and Answers