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-
Group
Northeast Power Coordinating Council
Guy Zito
No
<p>It was expressed in the last posting that the definition of Interpersonal Communications might inadvertently include data. The SDT responded that it does not by referring to Interpersonal in the wording of the definition. The word being defined shouldn't be in the definition. However, incorporating "allows two or more individuals to ..." is an option that may solve this problem. The next posting should clarify this. This standard does not comport with the informational filing that NERC submitted to FERC on August 10, 2009 regarding its discontinued use of sub-requirements in standards development activities. The sub-requirements should be modified into bulleted lists. Consider striking "to exchange Interconnection and operating information" in R1, R3, R5, R7, and R8. It is redundant to the use of Interpersonal Communications "to interact, consult, or exchange information" in the definition. Consider striking "to exchange Interconnection and operating information" in R2, R4, R6. It is redundant to the use of Alternative Interpersonal Communications which uses Interpersonal Communications in its definition. Interpersonal Communications includes "to interact, consult, or exchange information" in its definition. For R2, why is Interchange Coordinator excluded? It is included in the Requirement R1 which deals with the Interpersonal Communications. Communications would need to be maintained with the Interchange Coordinator in the event of a failure of the Interpersonal Communications. For R3, affected neighboring Transmission Operators should be included. For R4 and R6, the sub-requirement list is different from the associated Interpersonal Communications requirements R3 and R5 respectively. These should be duplicate. The sub-requirement list for R4 should match R3, and the sub-requirement list for R6 should match R5. In the event of a failure of the Interpersonal Communications, the Transmission Operator and Balancing Authority both would need to maintain communications to the same entities as in the requirement to have Interpersonal Communications. The sub-requirements should be bulleted lists. For R5, why are neighboring Balancing Authorities not included? Additionally, R5 should only read Contact with Interchange Coordinator within the same Interconnection. They need to be able to contact one another to identify discrepancies in scheduling and sources of meter error that could lead to deviations in ACE. Should R2, R4 and R6 be constructed parallel to R1, R3, and R5? In R1, R3 and R5, the requirement is "shall have" while in R2, R4, and R6, the requirement is "shall designate". Since one is for the Interpersonal Communications and the other is for the Alternative Interpersonal Communications, the same wording should be used. R2.2 and R1.2 should not be limited to Reliability Coordinators in the same Interconnection only. Modify "within the same Interconnection" to "within the same Interconnection, and, as appropriate, between asynchronously connected RCs which are not precluded by law from scheduling interchange energy (for schedule changes, curtailments, etc.)" since reliability coordination may be required among the RCs on both sides of an Interconnection boundary. The VSLs for R1 through R8 should be expanded to include multiple levels based on the number of entities that the functional entity does not have Interpersonal Communications or Alternative Interpersonal Communications with. FERC specified their general preference for graduated in paragraph 27 of their June 19, 2008 order on VSLs. The second half of the Severe VSL for R9 is almost a duplicate of the Lower VSL. There are some small changes in the wording but both situations deal with the case where there is a problem that has been identified with the Interpersonal Communications system and it takes more than two hours to initiate repair.</p>
No
If the requirement were going to remain. but the Project 2007-03 Real-Time Operations SDT proposed to retire that

requirement during their last posting. There needs to be better coordination with that SDT.
No
The language “to continuously assess transmission reliability” should be changed to “to continuously assess Bulk Electric System reliability” to reflect what the enforceability of the standards are meant to be. The requirement on the ERO should also be expanded similar to BAL-005-0.1b R1 to ensure that all operating entities and the entire BES are covered under a Reliability Coordinator. In R2, should “of” be “to”? Reliability Directives are issued to TOPs, BA, etc. The VSL for R1 is not consistent with the requirement. The requirement applies to the ERO but the VSL applies to the Regional Entity.
Yes
No
R1 states “When the results of an Operational Planning Analysis or Real-time Assessment indicate an expected or actual condition with Adverse Reliability Impacts within its Reliability Coordinator Area, each Reliability Coordinator shall notify issue an alert to all impacted Transmission Operators and Balancing Authorities in its Reliability Coordinator Area.” The word “notify” should be stuck.
The SDT did not address all concerns with COM-002-3 from the last posting. For entities registered as multiple functions, the combination of the definition of Reliability Directive and Requirement R1 could be confused to require a company to issue directives to itself. There are several organizations registered as a Reliability Coordinator, Transmission Operator and Balancing Authority. In these companies, it is not uncommon for those responsibilities to be distributed across multiple desks. Thus, for certain situations, a single System Operator may actually be the Reliability Coordinator and the Transmission Operator. In other situations, the System Operator serving the Reliability Coordinator function may be adjacent to the System Operator serving as the Transmission Operator or Balancing Authority. It should never be necessary for these System Operators to issue Reliability Directives to themselves in the first example or to their co-worker in the second example to demonstrate compliance to NERC standards. How the entity coordinates its actions among its Reliability Coordinator, Balancing Authority and Transmission Operator roles is a corporate governance issue that should not be confused or complicated by the NERC standards. Thus, standards should be made clear that the Reliability Directive is directed to another company. In place of requiring an operator, in real-time, to state “this is a Reliability Directive,” there should be an allowance for an entity to develop procedures indicating, in advance, their expectations for three-part communications to their sub-operating entities. Therefore, we suggest modifying R1 to be “When a Reliability Coordinator, Transmission Operator or Balancing Authority requires actions to be executed as a Reliability Directive, the Reliability Coordinator, Transmission Operator or Balancing Authority shall identify the action, either verbally, when the communication is issued, or in advance through documented procedures, as a Reliability Directive to the recipient. [Violation Risk Factor: High][Time Horizon: Real-Time.]” Also, the definition of Emergency as currently cited in these draft Standards and included in the existing NERC Glossary should be modified to include the NERC Glossary term Adverse Reliability Impact to make the Standards more crisp, clear and enforceable. Because the Project 2007-03 Real-Time Operations SDT proposed to utilize the definition of Adverse Reliability Impact in TOP-001-2 R5 during the last posting, the change to the definition should be coordinated with that team. There is a text box in IRO-005-4 that indicates this standard will be retired. Yet, there still remain requirements in the standard and various other associated documentation that indicates requirements are being move to this standard. Delete the text box. Strike IRO-014-2 Part 1.7. There is no need to have a weekly conference to discuss every Operating Procedure, Operating Process and Operating Plan. As this requirement is written, a conference call would be necessary for each. Furthermore, IRO-014-2 R4 already includes a requirement to have weekly conference calls that should suffice. IRO-014-2 R2 seems to recognize that these Operating Procedures, Processes and Plans likely will not need to be discussed weekly as it only requires an annual update. Requirement R2 in IRO-001 contains the words “which could include issuing Reliability Directives”, but Reliability Directives are not referenced anywhere else in the standard. This inclusion seems unnecessary since without it, R2 already requires that the RC take actions or direct actions by others to prevent identified events or mitigate the magnitude or duration of actual events that result in Adverse Reliability Impacts. Whether or not a Reliability Directive is issued is irrelevant in this requirement. These words should be removed. Note that COM-002 already stipulates the requirement for 3-part communication when a Reliability Directive is issued. The inclusion of “which could include issuing Reliability Directives” in IRO-001 is unnecessary.
Individual
Greg Froehling
Green Country Energy, Green Country Operating Services
No
COM-001 General question/comment. The reference to infrastructure should be removed and just keep the word “medium”. Here's why What communication medium (infrastructure) does not use satellite at some point unless entities are within a close geographical proximity? How likely is it to have 2 different mediums? • Local phone and fax hard-wire likely. • Long distance phone and fax – satellite • Cell phone – satellite • Internet – satellite • Radio – antenna The reason for mentioning this is, if all we have is satellite then the reference to infrastructure should be removed and just keep the word “medium”.
No Comment

No Comment
No Comment
No Comment
IRO-001-2 as proposed does not include the PSE in the applicability, nor does it require the PSE to respond to a directive. However, COM-002 requires them to repeat the directive back... If the directive is that important to repeat back should they not have to act upon the directive? I think the PSE should be included in IRO-001-2 this standard as they represent and direct generation facility deployment in many cases. Including the PSE in COM-001 may be a good idea too, just for the situations listed above.
Individual
Steve Alexanderson
Central Lincoln
No
See Q 6 below.
The stated purpose of COM-002 is: "To ensure emergency communications between operating personnel are effective." As written, the standard fails to meet this purpose because the three requirements only deal with communications at the entity level. There is no requirement for the directing entity to even try to reach operating personnel at the receiving entity. The directing entity may follow all the requirements of this standard by following R1 and R3 with the receiving entity's receptionist, answering service, janitor, night watchman, etc. The receiving entity only needs to meet R2, parroting the directive. Again this could be accomplished by anyone with no assurance the directive reaches the operating personnel who can implement it. When we stated a similar objection during the last comment period, The SDT's answer suggested this was a PER staffing issue, but none of the PER requirements even apply to DP/LSE directive recipients. We suggest the entity issuing the directive should be required to make an attempt to get it to those who are competent to understand and implement the directive. This is not a staffing, training, or credentials issue; it is a performance issue that falls squarely within the stated purpose of this standard. COM-001 R10 presents a paradoxical situation to an entity attempting to comply. Consider an interpersonal communication capability failure that lasts longer than 60 minutes past initial detection. At or before 60 minutes, the affected entity is expected to notify impacted entities. If it has no interpersonal communication capability, how shall it make this notification? And if the entity does manage to make such a notification, it has thereby proven that it does have interpersonal communication capability making such notification unnecessary. We again ask the SDT to consider that not all the entities in the applicability sections of COM-001 and 002 have 24/7 dispatch centers. These are typically smaller entities that were required to register because they exceed 25 MW or were asked in the past to voluntarily provide UFLS. They do not and do not need to continuously communicate with TOPs, BAs, RCs, etc; and a "reliability directive" is a theoretical thing that has never happened during the memories of thirty year employees. The directive issuing entities simply realize the limitations around the receiving entities and work around them. The financial burden on these small entities and their customers to go to 24/7 dispatch will not have a corresponding reliability benefit. And while the two COM standards do not explicitly state that entities must maintain 24/7 dispatch, when all the requirements and definitions and time horizons are taken together 24/7 continuous competent communication is implied. During the last comment period, the SDT suggested this was a registration issue beyond their control. We submit instead that this is a standard applicability question that the SDT does have control over, since it is right there in Section A.4 of the two COM standards. While we appreciate that the SDT is responding to FERC order 693 to include DPs, we note that FERC also stated: Paragraph 487: "We expect the telecommunication requirements for all applicable entities will vary according to their roles and that these requirements will be developed under the Reliability Standards development process." Paragraph 6: "A Reliability Standard may take into account the size of the entity that must comply and the costs of implementation" Paragraph 141: "...the Commission clarifies that it did not intend to ... impose new organizational structures..." Paragraph 31: "We emphasize that we are not, at this time, mandating a particular outcome by way of these directives, but we do expect the ERO to respond with an equivalent alternative and adequate support that fully explains how the alternative produces a result that is as effective as or more effective than the Commission's example or directive. We ask the SDT to exclude DPs, LSEs, and PSEs that do not have 24/7 dispatch centers from the applicability of these two standards in order to meet FERC order 693.
Group
Competitive Suppliers
Jack Cashin

<p>EPSA is the trade association for competitive suppliers including both generators and marketers that represent over 700 entities in the NERC compliance registry. As such, the EPSA membership includes members registered as Purchasing Selling Entities (PSE) in each NERC region. Moreover, many of EPSA's members are also registered as LSEs in several regions. In general, EPSA supports the progress made in revising COM-001, COM-002 and IRO-001 in Project 2006-06, particularly the improvements made to the definition of Reliability Directive. However, EPSA also has concerns with some proposed changes to the applicability sections of the revised standards. In addition, EPSA requests that the implementation plans be changed so that they are consistent with the standard. Regarding applicability, EPSA agrees that COM-001 should continue to not apply to Purchasing Selling Entity (PSE) and Load Serving Entity (LSE) functions. However, the implementation plan for COM-001-2 still includes a reference that PSEs and LSEs must comply (page 11 of the implementation plan). Additionally, EPSA supports the removal of LSEs and PSEs from IRO-001-2. Much like the situation with COM-001-2, the implementation plan for IRO-001-2 still includes a reference that LSEs and PSEs must comply (page 11 of the implementation plan). In both the implementation plans for COM-001-2 and IRO-001-2 these references should be removed. For reasons similar to those underlying why COM-001-2 and IRO-001-2 do not apply to PSEs and LSEs, EPSA opposes the addition of PSEs to the COM-002-3 applicability. The purpose of the emergency communications in these standards is "To ensure emergency communications between operating personnel are effective." The removal would recognize that PSEs and LSEs do not play an active role in reliability coordination under this standard since they have no authority, nor ability to assume or perform responsibilities associated with reliability coordination. When a RC, TOP, or BA needs to address an Emergency they do not contact, consult, or direct a PSE to take action to address the Emergency. Reliability is neither improved nor degraded by having these Standards applicable to PSEs or LSEs; therefore, COM-001, COM-002 and IRO-001 need not be applicable to PSEs or LSEs. Thanks to the drafting team members for their effort on revising the Project 2006-06 standards.</p>
Individual
Mace Hunter
Lakeland Electric
Yes
COM-002-3 R2. Each Balancing Authority, Transmission Operator, Generator Operator, Transmission Service Provider, Load-Serving Entity, Distribution Provider, and Purchasing-Selling Entity that is the recipient of a Reliability Directive issued per Requirement R1, shall repeat, restate, rephrase or recapitulate the Reliability Directive with enough details that the accuracy of the message can be confirmed by the originator. (Replace 'has been' with 'can be' and add 'by the originator' to better fit into the sequence with R3.)
Group
Exelon
John Bee
No
1. COM-001-2, 4.4 - Distribution Providers and 4.5, Generation Operators should be highlighted and communicated as a substantive change since entities may not be aware that they are being added to the applicability section of the standard. 2. COM-001-2, R10 - should have the following underlined clarifying text added, shall notify impacted entities within 60 minutes of the detection of a failure "of all primary and alternative " Interpersonal Communications capabilities that lasts 30 minutes or longer. Exelon believes that the intent of R10 is for complete loss of communication ability and should not be applied to facilities that have multiple backups. 3. COM-001-2, M1 thru 9 – Suggest that network diagrams and / or communications schematics be added as suggested evidence. 4. COM-001-2, VSL for R9 – Regarding failure to test the Alternative Interpersonal Communication, the Severity Level does not align with the potential impact to the BES. The Severity Level for simply missing a test should be revised to a High VSL.
Yes
No comment - only applicable to RC
Comments: No comment – only applicable to RC
Comments: No comment - only applicable to RC
1. COM-002-2, R2 – Remove the word "recapitulate", feel that "restate or rephrase" is adequate. The word "recapitulate" is not commonly used and is somewhat obscure. 2. COM-002-2, R3 – Suggest using the words "repeat back" rather than "state or respond that" to more clearly identify the expectation with more commonly used language. 3. IRO-001-2, R3 – While we appreciate that the SDT has defined the term "directive" as a much needed definition, IRC-001-2 R.3 now introduces a new term "direction". what is a "direction" and how does it differ from "directive"? If a new

term is going to be introduced it needs to be defined, if the intent was to use the word "directive" then "direction" should be replaced with "directive." 4. IRO-001-2, R4 – Again the term "as directed" is confusing, recommend that the text be changed to align with the term directive, "unable to perform the directive per Requirement R3."

Individual

Joe Petaski

Manitoba Hydro

Yes

Yes

Yes

Yes

Yes

-The current data retention requirement of 90 days is more than adequate. Increasing this period to 12 months would result in a significant amount of work with no benefit to reliability. -Clarification required on the VSL for R9 - there appears to be no difference in the description of the Lower VSL and second part of the Severe VSL following "or". - Clarification required - The existing version of COM-001 M1 indicates that maintenance records for communication facilities may be required but the proposed revision makes no mention of maintenance records. So evidence of maintenance is no longer required?

Group

PNGC Power member owners

Ron Sporseen

No

Thank you for the opportunity to comment and for your hard work on this project: While we agree that effective Interpersonal Communications capability are integral to reliability, many Distribution Providers (DP) are small entities that do not maintain a 24-7 dispatch desk capable of receiving or responding to emergency reliability directives in a timely manner. It is our belief that some of the proposals in this project could unnecessarily force small entities to make investments that will not enhance reliability. Many DPs rely on answering services to address customer-service issues during non-business hours. On-call personnel are contacted in the event of an outage or emergency and crews are dispatched as appropriate. It is difficult to envision a BA or TOP issuing an Emergency Reliability Directive to a small entity (25 MW or so) which would require these smaller entities to comply with COM-001. Order 693 directs the inclusions of DPs in the COM-001-2 standard but it is our belief that the Commission offered language that GOs and DPs need not have redundant communications, training unrelated to normal/emergency operations, and that telecommunications requirements for entities will vary according to their function. We believe those intentions should be reflected in the language of this standard. We would suggest adding wording such as in the applicability section, "Distribution Providers who maintain a 24-7 control centers with the ability to manually shed load of at least 100 MW within a 15-minute operational window." Also, a note that smaller, rural entities can be dependent on a phone system provider that will not allow for backup communications. Should the communication line(s) be dependent on one main phone trunk line, the failure due to an issue on this main line will make it impossible to notify anyone of its failure short of physically traveling to an area where phone service is available. For some rural areas, this will exceed the one hour time limit to report the communication outage. Forcing smaller entities to acquire satellite phone service to mitigate for a phone outage is a high price to pay when no reliability improvement will be achieved. Suggested change could be: "... shall notify impacted entities within 60 minutes of the detection of a failure of its Interpersonal Communications capabilities that lasts 30 minutes or longer where alternate forms of communication are available within a 15 minute access time. Should alternate forms of communication not be available within the 15 minute access time, then upon reestablishment of Communication capabilities impacted entities will be notified of the past loss and current status of Communication." We've heard many representatives from FERC and NERC indicate that the standards development process has led the industry to take action in many cases for the sake of compliance while not necessarily enhancing reliability. As has been stated many times, the process should be about improving reliability, not about complying with standards. Unnecessarily including smaller entities that will NEVER receive an emergency reliability directive might be an example of the former.

Empty table rows for additional comments.

Individual
Brian J Murphy
NextEra Energy, Inc.
No
As drafted, COM-001 is not clear or complete. At this stage in the evolution of compliance with the mandatory Reliability Standards, it is important that any new or revised Reliability Standard clearly articulate all compliance obligations and tasks consistent with Sections 302 (6) and (8) of the NERC Rules of Procedure. Thus, NextEra Energy Inc. (NextEra) has numerous recommended corrections to provide clarity and completeness to COM-001. For example, the requirement to designate an Alternative Interpersonal Communication capability is not clear. Does the designator solely designate for the designator's knowledge or does the designator need to inform the entity on the other end of the connection. In R2, for instance, the Reliability Coordinator must designate, but it is also not clear whether the Reliability Coordinator must inform the Balancing Authorities or Transmission Operators. It is further unclear whether the designation must be documented, or if any informing of the Balancing Authorities or Transmission Operators must be documented. Thus, it is recommended that the drafters decide what was intended regarding the designation and clearly state the requirements. In R9 it states that ". . . on at least a monthly basis." There are two issues to consider here. If the sentence stays, grammatically it should read ". . . on, at least, a monthly basis. . ." However, from a compliance and technical perspective, the term "at least" has no significance and should be deleted. The requirement is to test on a monthly basis – the phrase "at least" only introduces ambiguity and implies that the party should consider every two or three weeks. If the drafting team believes a best practice is less than a month, there are other NERC educational tools to explain a best practice. In R10, it states ". . . shall notify the impacted entity . . ." It would be clearer to state: ". . . shall notify the impacted Reliability Coordinator, Transmission Operator, Balancing Authority, Distribution Provider or Generator Operator . . ."
No
As stated in response to number 1, Reliability Standards are to be clear and complete. If a Transmission Operator is not responsible for a delay caused by a Reliability Coordinator, the Standard should specifically state that the Transmission Operator does not need to wait for an assessment or approval of a Reliability Coordinator to take actions pursuant to TOP-001-1 R3. Since the Reliability Coordinator is atop the reliability higherachy, such a statement provides clarity and completeness to understanding a Transmission Operators rights. Thus, TOP-001-1 R3 should be revised to lead with: "Without any obligation to first seek and obtain an assessment or approval from its Reliability Coordinator, each Transmission Operator . . ."
At this stage in evolution of compliance with the mandatory Reliability Standards, it is important that any new or revised Reliability Standard clearly articulate all compliance obligations and tasks consistent with Sections 302 (6) and (8) of the NERC Rules of Procedure. COM-002, IRO-001, IRO-002 and IRO-014 do not meet this threshold. Thus, NextEra has numerous recommended corrections to provide clarity and completeness to these Reliability Standards. COM-002 R1 The addition of defined terms for Reliability Directive and Emergency is a very good approach that helps provides clarity. Hence, it is also be appropriate to make the language in the requirement as clear as possible, and not add other implied or unexplained notions. Also, at times, in those regions with markets, it is not always clear whether a requirement to curtail for reliability reasons is being issued pursuant to market rules or from the Reliability Coordinator or Transmission Operator under the Reliability Standards. Therefore, it is also appropriate that the Reliability Coordinator, Transmission Operator, Balancing Authority be required to identify themselves; and if they fail to identify themselves or fail to use the term Reliability Directive, the registered entity receiving the flawed issuance should not be consider in violation of a Reliability Standard for failing to act. Accordingly, R1 would be clearer and have the same intent, if it stated as follows: "A Reliability Coordinator, Transmission Operator or Balancing Authority have the authority to issue an oral or written Reliability Directive as authorized in [list the specific Reliability Standard requirements such as IRO-001 R8 and TOP-001 R3]. The issuance of an oral of written Reliability Directive, by a Reliability Coordinator, Transmission Operator or Balancing Authority shall: (1) use the term 'Reliability Directive;' and (2) identify the issuer of the Reliability Directive as a Reliability Coordinator, Transmission Operator or Balancing Authority. If a Reliability Coordinator, Transmission Operator or Balancing Authority issues an oral or writtern directive without using the term "Reliability Directive" or failing to indentify itself as a Reliability Coordinator, Transmission Operator or Balancing Authority, the registered entity receiving the directive cannot be considered in violation for its failure to act." IRO-001 The definition of Adverse Reliability Impacts uses the term "instability." It is important that this term be technically defined in the same way "Cascading" is defined, otherwise the new requirement is not adding clarity; rather, it is maintaining the ambiguous term "instability" that will likely lead to confusion and debate. R1 Similar to the comments set forth with respect to COM-001 (question #1), the term "at least" should be deleted from R1 – it serves no useful purpose from a technical or compliance perspective; instead, it will add unnecessary ambiguity to the requirement. R2, as drafted, states: "Each Reliability Coordinator shall take actions or direct actions, which could include issuing oral or written Reliability Directives, of Transmission Operators, Balancing Authorities, Generator Operators, Interchange Coordinators and Distribution Providers within its Reliability Coordinator Area to prevent identified events or mitigate the magnitude or duration of actual events that result in Adverse Reliability Impacts. " This long sentence has several significant grammatical errors that result in the reader not being able to discern the meaning of the requirement. It also

unnecessarily adds verbiage that detracts from its primary focus. It is, therefore, recommended that R2 be revised as follows: "Each Reliability Coordinator shall take all necessary actions to prevent identified Emergencies or Adverse Reliability Impacts. These Reliability Coordinator actions shall include, to the extent necessary, the issuing of oral or written Reliability Directives to Transmission Operators, Balancing Authorities, Generator Operators, Interchange Coordinators and Distribution Providers located within its Reliability Coordinator Area. " R3, as drafted, is confusing and inconsistent with R2, and, thus, R3 should be revised to read as follows: "Upon receipt of a Reliability Directive issued pursuant to R2, a Transmission Operator, Balancing Authority, Generator Operator, Interchange Coordinator and Distribution Provider shall comply with the Reliability Directive, unless compliance would violate safety, equipment, regulatory or statutory requirements. In the event that a Transmission Operator, Balancing Authority, Generator Operator, Interchange Coordinator or Distribution Provider determines that compliance with a Reliability Directive would violate safety, equipment, regulatory or statutory requirements, the Transmission Operator, Balancing Authority, Generator Operator, Interchange Coordinator or Distribution Provider shall, within 10 minutes after the determination, inform the Reliability Coordinator of its inability to comply." IRO-002 R1 and R2, as written, are confusing. It is recommended that R1 and R2 be combined to read as follows: "Pursuant to a written procedure to mitigate the impact of a Reliability Coordinator's analysis tool outage, a Reliability Coordinator's System Operator shall also have the authority to approve, deny or cancel a planned outage for its analysis tool." IRO-014 It is unclear why the terms Operating Procedure, Operating Process or Operating Plan needs to be plural, as currently written in the Standard. Hence, it is recommended that these terms be made singular, otherwise a violation may be inferred for not having more than one Procedure, Process or Plan. 1.1 Insert the word "applicable" before "Reliability Coordinator." 2.1, as written, is confusing. Recommend that 2.1 read as follows: "Review and update, if an update is necessary, on an annual basis. Annual basis means the review shall be within one month plus or minus that date of the last review." R3 This requirement uses a very vague term "reliability-related information," which, also, does not track the language used in R1 -- "information." It is recommended that R1 and R3 use the same terms and read " . . . information, as defined by the Reliability Coordinator, . . ." R4 As stated above, "at least" does not add value, and, therefore, should be deleted. R5, as written, is confusing. The recommended fix is to delete "all other" and replace with "impacted".

Group

PacifiCorp

Sandra Shaffer

Yes

Yes

Yes

Yes

Yes

Individual

Jonathan Appelbaum

United Illuminating Company

No

COM-001-2 does not specify the amount of time a DP has to reestablish the Interpersonal Communication Capability after the capability fails before it is assessed non-compliance for not having the communication. Is an entity non-compliant the minute the communication capability is unavailable If so, then to be compliant a tertiary (or secondary capability for DP) must be installed by the entity. Something similar was discussed with EOP-008 R3: "To avoid requiring a tertiary facility, a backup facility is not required during: • Planned outages of the primary or backup facilities of two weeks or less • Unplanned outages of the primary or backup facilities" UI suggests the drafting team incorporate something similar. The VSL for R7 is severe only and states: "The Distribution Provider failed to have Interpersonal Communications capability with one or more of the entities listed in Parts 7.1 or 7.2." I believe there should be a time component to the VSL and the VSL staged. For example, failure to have communication established for less than 60 minutes would be Lower, anything over 1 hour severe Also needed is a phrase to state when the violation begins. Does the violation begin when the loss of Communication Capability is detected or when it occurred? In other words, does the violation start when the operator attempts to use the phone and it is not functional, or did it occur when the phone line functionality failed but was not yet detected because no attempt to use the phone was made. So the VSL for R7 would follow a format of: "The Distribution Provider failed to have Interpersonal Communication Capability with one or more entities listed in Parts 7.1 or 7.2 for a continual 60 minutes period as measured from the time the ICC failure was detected". An alternative remedy is to alter the language of R7 to allow for unplanned outage. NERC does not have a Reliability Requirement for a DP to staff a control room 24/7. COM-0001 can be interpreted to imply that a DP needs to be staffed 24/7 to facilitate interpersonal communications. If NERC wants to extend the requirement for a 24/7 staffed

operating position at the DP then the appropriate method is thru a SAR to PER-002. COM-001 R7 should have a sub-requirement added recognizing that DP's are not required to staff 24/7 and many do not staff overnight. UI suggests adding R7.3: DP's will notify their TOP and/or BA when it is not staffing an operating desk. R7: Should address the instance if the DP is not required to have communication with the BA, because the BA communicates thru the TOP.

Yes

Yes

Yes

Yes

Comments: 1. COM-002 R2 seems awkwardly worded. R2. Each [Entity] that is the recipient of a Reliability Directive issued per Requirement R1, shall repeat, restate, rephrase or recapitulate the Reliability Directive with enough details that the accuracy of the message has been confirmed. " R2 as it is written says the repeat is confirming the accuracy of the message itself. I think it is agreed that the repeat back in R2 is to allow the issuer of the Directive to confirm that the message was received accurately understood by the recipient. I suggest: R2. Each [Entity] that is the recipient of a Reliability Directive issued per Requirement R1, shall repeat, restate, rephrase or recapitulate the Reliability Directive with enough details to allow the Issuer to confirm that the directive recipient accurately understands the Directive" 2. The VSL for R2 is severe and states "The responsible entity that was the recipient of a Reliability Directive failed to repeat, restate, rephrase or recapitulate the Reliability Directive with enough details that the accuracy of the message was confirmed." The purpose of the R2 repeat-back is to allow the Issuer verify the message was accurately received. This VSL penalizes the responsible entity for not accurately receiving the message. The VSL should penalize the refusal of the registered entity to repeat back the message not for receiving the message incorrectly. Suggested rewording: "The responsible entity that was the recipient of a Reliability Directive failed to repeat, restate, rephrase or recapitulate the Reliability Directive with enough details that the accuracy of the message can be evaluated by the entity issuing the Reliability Directive" 3. United Illuminating does agree with the definition of Reliability Directive and Emergency.

Group

Bonneville Power Administration

Denise Koehn

Yes

Yes

Yes

Yes

Yes

Group

PPL

Brenda Truhe

Yes

Yes

Yes

Yes

Yes

We are providing the following comments for the Standards Drafting Team to consider. 1) Consider changing R1 to 'Each RC shall have the capability for Interpersonal Communications with the following entities to exchange

Interconnection and operating information...’ for clarity as Interpersonal Communications and capability are both nouns. 2) We feel changing the applicability of the standard is important to the accuracy of the standard. The purpose of COM-002 is ‘To ensure emergency communications between operating personnel are effective’. Since operating personnel are covered by the applicability of RC, BA, TOP and GOP, we suggest the applicability to TSP, LSE, and PSE be removed from COM-002-3. 3) Additionally, we would like to bring to the attention of the Standards Drafting Team, that the implementation plan for COM-001-2 and IRO-001-2 still includes TSP, LSE, and PSE although the revised standard does not include these entities in the Applicability Section. For COM-001-2 refer to the implementation plan, page 1. For IRO-001-2 refer to the implementation plan for new R2, new R3, new R4 and the chart on the last page. Thank you for your consideration in addressing these comments.

Individual
Paul Kerr
Shell Energy North America (US), L.P.

The introduction of the definition of “Reliability Directive” and its connection to the definition of “Emergency” within this Project brings much needed clarity for the sector and will promote consistency between Regional Entities and within the audits of Registered Entities. Shell Energy supports the removal of Purchasing Selling Entities as a function to which IRO-001 applies. This removal recognizes that PSEs do not play a role in reliability coordination under this standard since they have no authorities and no abilities to assume or perform responsibilities associated with reliability coordination. This conclusion is reinforced by the adoption of the defined term “Reliability Directive”. Where a RC, TOP, or BA needs to address an Emergency they do not contact, consult, or direct a PSE to take action that would address the Emergency. Rather, where the PSE is a user of the grid to perform or execute transactions, it is subject to the actions of these other entities that have the authority to stop, curtail, or alter the submitted transactions of the PSE in a way that aids in resolving the problem. With the fitting adoption of “Reliability Directive” into COM-002 as well, Shell Energy does not believe it is necessary or appropriate for the applicability of this standard to include Purchasing Selling Entities, as is contained in the current draft proposal. This standard does not apply to PSEs today, however, during the progression of Project 2006-06 this applicability was added to an early draft version that preceded the discussions and clarification that comes from the definition of a Reliability Directive in the standard. Shell Energy does not support the inclusion of PSEs in the current draft version of COM-002, and feels that it should be removed. The purpose of this standard is, “To ensure Emergency communications between operating personnel are effective” and relates directly to the capabilities and authorities established for the RC, TOP, or BA that requires actions to be taken by a recipient of a Reliability Directive. As noted previously, PSEs are acted upon by the entities with the necessary authority, and are not in a role that would initiate or fulfil the required actions. As additional matters related to the clarification and cleanup of the standards in this project, the implementation plans for both IRO-001 and COM-001 erroneously contain references to PSEs in the sections “Functions that Must Comply with the Requirements”. These references need to be removed.

Individual
Thad Ness
American Electric Power

No
The applicability of COM-001 and COM-002 appear to be at odds with each other. The requirements may need to be re-written so that they are in sync.

Yes
No

This is out of scope with the standard, as it is currently addressed through the NERC certification process that the NERC reliability coordinators are subject to.

The language used in COM-002-3 R2 including “with enough details that the accuracy of the message has been confirmed” is subjective and ambiguous. IRO-001 R2, R3, and R4 have replaced “Directives” with the word direction in lower case (while it appears that “Directives” is a subset of “directions”). We believe that this muddies the waters and could bring numerous conversations and dialog into scope unnecessarily. The end result is that the RC has the right to issue and use “Directives” and anything short of this could just be communications. For example, a number of entities that are Reliability Coordinators also facilitate energy markets. There are many communications related to markets that probably should be out of scope with respect to the standards. Furthermore, it might not be clear what role (eg Reliability Coordinator, market operator, etc) the staff at these entities are fulfilling.

Group

PSEG
Patricia Hervocho
No
Com-001-2 implementation plan lists that this is applicable to PSE's and LSE's however, PSE's and LSE's were removed from the actual standard. The implementation plan should be revised.
IRO Com-002-3 standard continues to include PSE. PSE's do not play an active role and have no authority or ability to perform reliability coordination. PSE's should be removed from the standard. -001-2 references PSE's in the implementation for R2, R3, R4 and "Functions that must comply with the requirements in this standard" table. PSE's were removed from the standard and should be removed from the implementation plan.
Group
Dominion
Louis Slade
No
The monthly testing requirement for Alternative Interpersonal Communications is overly burdensome without any evidence to support that it is necessary to insure reliability. We believe that an entity will take necessary steps to insure the Alternative Interpersonal Communications is functioning properly, especially if it experiences problems with its Interpersonal Communications, it. We can support quarterly testing as we believe it strikes a reasonable balance.
Yes
We do not agree with the addition of weekly conference calls as required in R4. We believe that RCs should schedule calls as needed but do not agree that a weekly scheduled call improves reliability.
Individual
David Thorne
Pepco Holdings Inc
Yes
Yes
Yes
Yes
Yes
Group
SERC OC Standards Review Group
Jim Case
No
Each sub-requirement should not have an "R" in front of the number in order to be consistent with NERC's August 10, 2009 filing at FERC on this subject. Requirement R3 and R4 should include adjacent TOPs as a sub-requirement. Requirements R5 and R6 should include adjacent BAs as a sub-requirement. "to exchange Interconnection and operating information" should be deleted from requirements R1 through R8 as it is redundant with the definition of Interpersonal Communications The last page of the Implementation Plan includes LSEs, PSE, and TSPs as being responsible entities under this standard, yet the standard does not include them. Please correct the implementation plan.
No
Top-001-1, Requirement R3, which is what the SDT appears to be using as its justification for not adding a requirement here is proposed to be deleted by the RTO-SDT on Project 2007-03.

No
We think you are attempting to create a requirement similar to BAL-005, R1. That language copied here is clear and concise - All generation, transmission, and load operating within an Interconnection must be included within the metered boundaries of a Balancing Authority Area.
Yes
Yes
Please remove the yellow box on page 1 indicating this standard will be retired.
Reliability Directives may be issued by blast calls from Reliability Coordinators. It is inefficient and may be a hindrance to reliability to require 3-part communications in these instances. There are several organizations registered as BAs, RCs and TOPs. It is not uncommon for those entities to be distributed across multiple desks in the same control room without regard to how an entity is registered. Thus, a single System Operator may perform functions that are categorized under two or more of those functional entities. The drafting team should clarify that under no circumstances should that System Operator be required to issue a Reliability Directive to himself. This is a corporate governance issue. In IRO-014, R1, delete sub-requirement 1.7. The requirement for weekly conference calls related to operating procedures is duplicative to R4 and could be burdensome while adding very little value under certain circumstances. In IRO-014, R4, delete the phrase "(per Requirement 1, Part 1.7)" as a conforming change. In IRO-014, Requirements R6-R8 allow at least the theoretical possibility that an RC may determine an Adverse Reliability Impact in another RC's area that the other RC neither can see nor believes that any action should be taken. R7 puts the burden on the first RC to develop a plan that it cannot implement because it has no agreement with the BAs and TOPs in the other RC area. As such, this requirement is unenforceable. Please review all the implementation plans to be sure the applicable entities match those in the standards. "The comments expressed herein represent a consensus of the views of the above named members of the SERC OC Standards Review group only and should not be construed as the position of SERC Reliability Corporation, its board or its officers."
Individual
Andrew Pusztai
American Transmission Company
Yes
ATC agrees with the understanding that the line of demarcation is up to the point where ATC owns the equipment.
Yes
Yes
Yes
Yes
None
Group
Arizona Public Service Company
Janet Smith
Yes
Yes
Yes
Yes
Group
LG&E and KU Energy
Brent Ingebrigtson

<p>1) LG&E/KU suggests that the definitions and related Reliability Standards be edited to provide a clearer understanding of what is required. When used in the requirements of COM-001, the proposed definitions for Interpersonal Communication and Alternative Interpersonal Communication read improperly (i.e., a “medium capability”). This may cause confusion as to what is required by the Applicable entities. Any further use of these terms may cause greater confusion. Suggested Alternative: Interpersonal Communication: Any instance where two or more individuals interact, consult, or exchange information. The definition of “Alternative Interpersonal Communication” would not have to be changed since it is dependent upon the definition of “Interpersonal Communication.” The change of the definitions of Interpersonal Communication and Alternative Interpersonal Communication shifts their focus to the communication itself—the event. This makes the Requirements themselves much clearer since the Requirements focus on the need that entities have the capabilities—the medium. It appears the SDT’s intent is to ensure that the event takes place by requiring that the medium for those events are in place. This is much clearer if there is a distinction between the two (the event and the medium) than if they have similar definitions (a medium and a “medium capability”). 2) LG&E/KU question the consistency of the Applicability sections as they pertain to the TSP, LSE and PSE functions between COM-001 and COM-002. The deletion of the TSP, LSE and PSE from COM-001 is supported, but if these entities are not required to establish Interpersonal Communication (or Alternative Interpersonal Communication) capability with reliability entities (RC, BA, TOP), should they still be required to follow the reliability directive process of COM-002? If the probability of issuing a Reliability Directive to a TSP, LSE or PSE is so low that Interpersonal Communications capabilities with reliability entities is not justified under COM-001, why are the TSP, LSE and PSE still held to the 3 way communication requirements of COM-002? Suggest the Applicability of COM-002 to TSP, LSE and PSE and associated requirements be deleted.</p>
Group
IRC Standards Review Committee
Albert DiCaprio
No
<p>We expressed in the last posting that we felt the definition of Interpersonal Communications might inadvertently include data. The SDT responded that it does not by referring to Interpersonal in the name of the definition. Clearly, you can’t refer to the word you are defining in order to define it. However, it is possible “allows two or more individuals to ...” may solve this problem. Clarity should be sought in the next posting, if possible. This standard does not comport with the informational filing that NERC submitted to FERC on August 10, 2009 regarding its discontinued use of sub-requirements in standards development activities. We request the sub-requirements be modified into bulleted lists. Consider striking “to exchange Interconnection and operating information” in R1, R3, R5, R7, and R8. It is redundant to the use of Interpersonal Communications “to interact, consult, or exchange information” in the definition. Consider striking “to exchange Interconnection and operating information” in R2, R4, R6. It is redundant to the use of Alternative Interpersonal Communications which uses Interpersonal Communications in its definition. Interpersonal Communications includes “to interact, consult, or exchange information” in its definition. For R2, why is Interchange Coordinator excluded? It is included in the Requirement R1 which deals with the Interpersonal Communications. Communications would need to be maintained with the Interchange Coordinator in the event of a failure of the Interpersonal Communications. For R3, affected neighboring Transmission Operators should be included. For R4 and R6, the sub-requirement list is different than for than for the associated Interpersonal Communications requirements R3 and R5 respectively. We believe these should be duplicate. That is the sub-requirement list for R4 should match R3 and the R6 should match R5. In the event of a failure of the Interpersonal Communications, the Transmission Operator and Balancing Authority both would need to maintain communications to the same entities as in the requirement to have Interpersonal Communications. Again, we would suggest replacing sub-requirements with bulleted lists. For R5, why are neighboring Balancing Authorities not included? Additionally R5 should only read Contact with Interchange Coordinator within same Interconnection. They certainly need to be able to contact one another to identify discrepancies in scheduling and sources of meter error that could lead to deviations in ACE. Should R2, R4 and R6 be constructed parallel to R1, R3, and R5? In R1, R3 and R5, the requirement is “shall have” while in R2, R4, and R6, the requirement is “shall designate”. Since one is for the Interpersonal Communications and the other is for the Alternative Interpersonal Communications, it seems the same wording should be used. We do not believe R2.2 and R1.2 should be limited to Reliability Coordinators in the same Interconnection only. We suggest modifying “within the same Interconnection” to “within the same Interconnection, and, as appropriate, between a-synchronously connected RCs which are not precluded by law from scheduling interchange energy (for schedule changes, curtailments, etc.)” since reliability coordination may be required among the RCs on both sides of an Interconnection boundary. The VSLs for R1 through R8 should be expanded to include multiple levels based on the number of entities that the functional entity does not have Interpersonal Communications or Alternative Interpersonal Communications. FERC specified their general preference for gradated in paragraph 27 of their June 19, 2008 order on VSLs. The second half of the Severe VSL for R9 is almost a duplicate to the Lower VSL. There are some small changes in the wording but both situations deal with the case where there is a problem that has been identified with the Interpersonal Communications system and it takes more than two hours to initiate repair.</p>
No

It might if the requirement were going to remain but the Project 2007-03 Real-Time Operations SDT proposed to retire that requirement during their last posting. We believe there needs to be better coordination with that SDT.
No
The language “to continuously assess transmission reliability” should be changed to “to continuously assess Bulk Electric System reliability” to reflect what the enforceability of the standards are meant to be. The requirement on the ERO should also be expanded similar to BAL-005-0.1b R1 to ensure that all operating entities and the entire BES is covered under a Reliability Coordinator. In R2, should “of” be “to”? Reliability Directives are issued to TOPs, BA, etc. The VSL for R1 is not consistent with the requirement. The requirement applies to the ERO but the VSL applies to the Regional Entity.
Yes
Yes
R1 states “When the results of an Operational Planning Analysis or Real-time Assessment indicate an expected or actual condition with Adverse Reliability Impacts within its Reliability Coordinator Area, each Reliability Coordinator shall notify issue an alert to all impacted Transmission Operators and Balancing Authorities in its Reliability Coordinator Area.” The word “notify” should be stuck.
The SDT did not address all of our concerns with COM-002-3 from the last posting. For entities registered as multiple functions, the combination of the definition of Reliability Directive and Requirement R1 could be confused to require a company to issue directives to itself. There are several organizations registered as a Reliability Coordinator, Transmission Operator and Balancing Authority. In these companies, it is not uncommon for those responsibilities to be distributed across multiple desks. Thus, for certain situations, a single System Operator may actually be the Reliability Coordinator and the Transmission Operator. In other situations, the System Operator serving the Reliability Coordinator function may be adjacent to the System Operator serving the as the Transmission Operator or Balancing Authority. We believe that it should never be necessary for these System Operators to issue Reliability Directives to themselves in the first example or to their co-worker in the second example to demonstrate compliance to NERC standards. How the entity coordinates its actions among its Reliability Coordinator, Balancing Authority and Transmission Operator roles is a corporate governance issue that should not be confused or complicated by the NERC standards. Thus, we believe that standards should be made clear that the Reliability Directive is directed to another company. We believe that, in place of requiring an operator, in real-time, to state “this is a Reliability Directive,” there should be an allowance for an entity to develop procedures indicating, in advance, their expectations of three-part to their sub-operating entities. Therefore, we suggest modifying R1 to be “When a Reliability Coordinator, Transmission Operator or Balancing Authority requires actions to be executed as a Reliability Directive, the Reliability Coordinator, Transmission Operator or Balancing Authority shall identify the action, either verbally, when the communication is issued, or in advance through documented procedures, as a Reliability Directive to the recipient. [Violation Risk Factor: High][Time Horizon: Real-Time.]” Also, we believe that the definition of Emergency, as currently cited in these draft Standards and included in the existing NERC Glossary should be modified to include the NERC Glossary term Adverse Reliability Impact to make the Standards more crisp, clear and enforceable. Because the Project 2007-03 Real-Time Operations SDT proposed to utilize the definition of Adverse Reliability Impact in TOP-001-2 R5 during the last posting, the change to the definition should be coordinated with that team. There is a text box in IRO-005-4 that indicates this standard will be retired. Yet, there still remain requirements in the standard and various other associated documentation indicates requirements are being move to this standard. Please delete the text box. IRO-014-2 R4 already includes a requirement to have weekly conference calls that should suffice. IRO-014-2 R2 seems to recognize that these Operating Procedures, Processes and Plans likely will not need to be discussed weekly as it only requires an annual update. In the definition of Reliability Directive, we suggest changing “to address an Emergency” to “to address a reliability constraint or a declared Emergency”. Further, Requirement R2 in IRO-001 contains the words “which could include issuing Reliability Directives” but Reliability Directives are not referenced anywhere else in the standard. This inclusion seems unnecessary since without it, R2 already requires that the RC take actions or direct actions by others to prevent identified events or mitigate the magnitude or duration of actual events that result in Adverse Reliability Impacts. Whether or not a Reliability Directive is issued is irrelevant in this requirement. We suggest that these words be removed. Note that COM-002 already stipulates the requirement for 3-part communication when a Reliability Directive is issued. The inclusion of “which could include issuing Reliability Directives” in IRO-001 is unnecessary.
Individual
Kathleen Goodman
ISO New England
No
We expressed in the last posting that we felt the definition of Interpersonal Communications might inadvertently include data. The SDT responded that it does not by referring to Interpersonal in the name of the definition. Clearly, you can't refer to the word you are defining in order to define it. However, it is possible “allows two or more individuals to ...” may solve this problem. Clarity should be sought in the next posting, if possible. This standard does not comport with the informational filing that NERC submitted to FERC on August 10, 2009 regarding its discontinued use of sub-requirements in standards development activities. We request the sub-requirements be modified into bulleted lists. Consider striking “to exchange Interconnection and operating information” in R1. R3. R5. R7. and R8. It is redundant to

the use of Interpersonal Communications “to interact, consult, or exchange information” in the definition. Consider striking “to exchange Interconnection and operating information” in R2, R4, R6. It is redundant to the use of Alternative Interpersonal Communications which uses Interpersonal Communications in its definition. Interpersonal Communications includes “to interact, consult, or exchange information” in its definition. For R2, why is Interchange Coordinator excluded? It is included in the Requirement R1 which deals with the Interpersonal Communications. Communications would need to be maintained with the Interchange Coordinator in the event of a failure of the Interpersonal Communications. For R3, affected neighboring Transmission Operators should be included. For R4 and R6, the sub-requirement list is different than for the associated Interpersonal Communications requirements R3 and R5 respectively. We believe these should be duplicate. That is the sub-requirement list for R4 should match R3 and the R6 should match R5. In the event of a failure of the Interpersonal Communications, the Transmission Operator and Balancing Authority both would need to maintain communications to the same entities as in the requirement to have Interpersonal Communications. Again, we would suggest replacing sub-requirements with bulleted lists. For R5, why are neighboring Balancing Authorities not included? Additionally R5 should only read Contact with Interchange Coordinator within same Interconnection. They certainly need to be able to contact one another to identify discrepancies in scheduling and sources of meter error that could lead to deviations in ACE. Should R2, R4 and R6 be constructed parallel to R1, R3, and R5? In R1, R3 and R5, the requirement is “shall have” while in R2, R4, and R6, the requirement is “shall designate”. Since one is for the Interpersonal Communications and the other is for the Alternative Interpersonal Communications, it seems the same wording should be used. We do not believe R2.2 and R1.2 should be limited to Reliability Coordinators in the same Interconnection only. We suggest modifying “within the same Interconnection” to “within the same Interconnection, and, as appropriate, between a-synchronously connected RCs which are not precluded by law from scheduling interchange energy (for schedule changes, curtailments, etc.)” since reliability coordination may be required among the RCs on both sides of an Interconnection boundary. The VSLs for R1 through R8 should be expanded to include multiple levels based on the number of entities that the functional entity does not have Interpersonal Communications or Alternative Interpersonal Communications. FERC specified their general preference for graduated in paragraph 27 of their June 19, 2008 order on VSLs. The second half of the Severe VSL for R9 is almost a duplicate to the Lower VSL. There are some small changes in the wording but both situations deal with the case where there is a problem that has been identified with the Interpersonal Communications system and it takes more than two hours to initiate repair.

No

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No

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Yes

Yes

R1 states “When the results of an Operational Planning Analysis or Real-time Assessment indicate an expected or actual condition with Adverse Reliability Impacts within its Reliability Coordinator Area, each Reliability Coordinator shall notify issue an alert to all impacted Transmission Operators and Balancing Authorities in its Reliability Coordinator Area.” The word “notify” should be struck.

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Real-Time.]" Also, we believe that the definition of Emergency, as currently cited in these draft Standards and included in the existing NERC Glossary should be modified to include the NERC Glossary term Adverse Reliability Impact to make the Standards more crisp, clear and enforceable. Because the Project 2007-03 Real-Time Operations SDT proposed to utilize the definition of Adverse Reliability Impact in TOP-001-2 R5 during the last posting, the change to the definition should be coordinated with that team. There is a text box in IRO-005-4 that indicates this standard will be retired. Yet, there still remain requirements in the standard and various other associated documentation indicates requirements are being move to this standard. Please delete the text box. IRO-014-2 R4 already includes a requirement to have weekly conference calls that should suffice. IRO-014-2 R2 seems to recognize that these Operating Procedures, Processes and Plans likely will not need to be discussed weekly as it only requires an annual update. In the definition of Reliability Directive, we suggest changing "to address an Emergency" to "to address a reliability constraint or a declared Emergency". Further, Requirement R2 in IRO-001 contains the words "which could include issuing Reliability Directives" but Reliability Directives are not referenced anywhere else in the standard. This inclusion seems unnecessary since without it, R2 already requires that the RC take actions or direct actions by others to prevent identified events or mitigate the magnitude or duration of actual events that result in Adverse Reliability Impacts. Whether or not a Reliability Directive is issued is irrelevant in this requirement. We suggest that these words be removed. Note that COM-002 already stipulates the requirement for 3-part communication when a Reliability Directive is issued. The inclusion of "which could include issuing Reliability Directives" in IRO-001 is unnecessary.

Individual

Steve Myers

ERCOT ISO

No

We expressed in the last posting that we felt the definition of Interpersonal Communications might inadvertently include data. The SDT responded that it does not by referring to Interpersonal in the name of the definition. Clearly, you can't refer to the word you are defining in order to define it. However, it is possible "allows two or more individuals to ..." may solve this problem. Clarity should be sought in the next posting, if possible. This standard does not comport with the informational filing that NERC submitted to FERC on August 10, 2009 regarding its discontinued use of sub-requirements in standards development activities. We request the sub-requirements be modified into bulleted lists. Consider striking "to exchange Interconnection and operating information" in R1, R3, R5, R7, and R8. It is redundant to the use of Interpersonal Communications "to interact, consult, or exchange information" in the definition. Consider striking "to exchange Interconnection and operating information" in R2, R4, R6. It is redundant to the use of Alternative Interpersonal Communications which uses Interpersonal Communications in its definition. Interpersonal Communications includes "to interact, consult, or exchange information" in its definition. For R2, why is Interchange Coordinator excluded? It is included in the Requirement R1 which deals with the Interpersonal Communications. Communications would need to be maintained with the Interchange Coordinator in the event of a failure of the Interpersonal Communications. For R3, affected neighboring Transmission Operators should be included. For R4 and R6, the sub-requirement list is different than for than for the associated Interpersonal Communications requirements R3 and R5 respectively. We believe these should be duplicate. That is the sub-requirement list for R4 should match R3 and the R6 should match R5. In the event of a failure of the Interpersonal Communications, the Transmission Operator and Balancing Authority both would need to maintain communications to the same entities as in the requirement to have Interpersonal Communications. Again, we would suggest replacing sub-requirements with bulleted lists. For R5, why are neighboring Balancing Authorities not included? Additionally R5 should only read Contact with Interchange Coordinator within same Interconnection. They certainly need to be able to contact one another to identify discrepancies in scheduling and sources of meter error that could lead to deviations in ACE. Should R2, R4 and R6 be constructed parallel to R1, R3, and R5? In R1, R3 and R5, the requirement is "shall have" while in R2, R4, and R6, the requirement is "shall designate". Since one is for the Interpersonal Communications and the other is for the Alternative Interpersonal Communications, it seems the same wording should be used. We do not believe R2.2 and R1.2 should be limited to Reliability Coordinators in the same Interconnection only. We suggest modifying "within the same Interconnection" to "within the same Interconnection, and, as appropriate, between a-synchronously connected RCs which are not precluded by law from scheduling interchange energy (for schedule changes, curtailments, etc.)" since reliability coordination may be required among the RCs on both sides of an Interconnection boundary. The VSLs for R1 through R8 should be expanded to include multiple levels based on the number of entities that the functional entity does not have Interpersonal Communications or Alternative Interpersonal Communications. FERC specified their general preference for gradated in paragraph 27 of their June 19, 2008 order on VSLs. The second half of the Severe VSL for R9 is almost a duplicate to the Lower VSL. There are some small changes in the wording but both situations deal with the case where there is a problem that has been identified with the Interpersonal Communications system and it takes more than two hours to initiate repair.

No

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No

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covered under a Reliability Coordinator. In R2, should "of" be "to"? Reliability Directives are issued to TOPs, BA, etc. The VSL for R1 is not consistent with the requirement. The requirement applies to the ERO but the VSL applies to the Regional Entity.

Yes

Yes

R1 states "When the results of an Operational Planning Analysis or Real-time Assessment indicate an expected or actual condition with Adverse Reliability Impacts within its Reliability Coordinator Area, each Reliability Coordinator shall notify issue an alert to all impacted Transmission Operators and Balancing Authorities in its Reliability Coordinator Area." The word "notify" should be stuck.

The SDT did not address all of our concerns with COM-002-3 from the last posting. For entities registered as multiple functions, the combination of the definition of Reliability Directive and Requirement R1 could be confused to require a company to issue directives to itself. There are several organizations registered as a Reliability Coordinator, Transmission Operator and Balancing Authority. In these companies, it is not uncommon for those responsibilities to be distributed across multiple desks. Thus, for certain situations, a single System Operator may actually be the Reliability Coordinator and the Transmission Operator. In other situations, the System Operator serving the Reliability Coordinator function may be adjacent to the System Operator serving the as the Transmission Operator or Balancing Authority. We believe that it should never be necessary for these System Operators to issue Reliability Directives to themselves in the first example or to their co-worker in the second example to demonstrate compliance to NERC standards. How the entity coordinates its actions among its Reliability Coordinator, Balancing Authority and Transmission Operator roles is a corporate governance issue that should not be confused or complicated by the NERC standards. Thus, we believe that standards should be made clear that the Reliability Directive is directed to another company. We believe that, in place of requiring an operator, in real-time, to state "this is a Reliability Directive," there should be an allowance for an entity to develop procedures indicating, in advance, their expectations of three-part to their sub-operating entities. Therefore, we suggest modifying R1 to be "When a Reliability Coordinator, Transmission Operator or Balancing Authority requires actions to be executed as a Reliability Directive, the Reliability Coordinator, Transmission Operator or Balancing Authority shall identify the action, either verbally, when the communication is issued, or in advance through documented procedures, as a Reliability Directive to the recipient. [Violation Risk Factor: High][Time Horizon: Real-Time.]" Also, we believe that the definition of Emergency, as currently cited in these draft Standards and included in the existing NERC Glossary should be modified to include the NERC Glossary term Adverse Reliability Impact to make the Standards more crisp, clear and enforceable. Because the Project 2007-03 Real-Time Operations SDT proposed to utilize the definition of Adverse Reliability Impact in TOP-001-2 R5 during the last posting, the change to the definition should be coordinated with that team. There is a text box in IRO-005-4 that indicates this standard will be retired. Yet, there still remain requirements in the standard and various other associated documentation indicates requirements are being move to this standard. Please delete the text box. IRO-014-2 R4 already includes a requirement to have weekly conference calls that should suffice. IRO-014-2 R2 seems to recognize that these Operating Procedures, Processes and Plans likely will not need to be discussed weekly as it only requires an annual update. In the definition of Reliability Directive, we suggest changing "to address an Emergency" to "to address a reliability constraint or a declared Emergency". Further, Requirement R2 in IRO-001 contains the words "which could include issuing Reliability Directives" but Reliability Directives are not referenced anywhere else in the standard. This inclusion seems unnecessary since without it, R2 already requires that the RC take actions or direct actions by others to prevent identified events or mitigate the magnitude or duration of actual events that result in Adverse Reliability Impacts. Whether or not a Reliability Directive is issued is irrelevant in this requirement. We suggest that these words be removed. Note that COM-002 already stipulates the requirement for 3-part communication when a Reliability Directive is issued. The inclusion of "which could include issuing Reliability Directives" in IRO-001 is unnecessary.

Individual

Steve Rueckert

WECC

Yes

Yes

Yes

Yes

Yes

Suggested minor revision to the definition of Reliability Directive as follows (change in caps) A communication, IDENTIFIED AS A RELIABILITY DIRECTIVE, initiated by a Reliability Coordinator, Transmission Operator, or Balancing Authority where action by the recipient is necessary to address an Emergency. Clearly identifying a

communication as a Reliability Directive provides immediate information to the recipient as the the nature of the communications.
Individual
Bill Keagle
BGE
Yes
BGE has no additional comments.
Yes
BGE has no additional comments.
Yes
BGE has no additional comments.
Yes
BGE has no additional comments.
Yes
BGE has no additional comments.
BGE has no additional comments.
Group
MRO's NERC Standards Review Subcommittee
Carol Gerou
No
A. R5.5 states a BA shall have Interpersonal Communications with each Interchange Coordinator within its BA area and adjacent Interchange Coordinators. NERC Registry Criteria (v5) uses the term "Interchange Authority" not Interchange Coordinator, please clarify. B. Upon review of the NERC Compliance Registry, there are only 56 BA's that are also registered as an IA but 138 total BA's within the registry. R5.5 is not clearly written because many BA's do not have an IA within their BA area. Though a BA will use an IA to schedule interchange, a possible rewrite of R5.5 may be "Each Interchange Authority that the BA actively uses to arrange Interchange". C. R10 states that the RC, TOP, BA, DP and GOP shall notify "impacted entities" within 60 minutes... Please clarify if the SDT means the entities within the applicability section or is this to be determined by the entity. A possible rewrite may be; "Each RC shall notify TOP's, BA's, and IA's within its RC area along with adjacent RC's within the same Interconnection". This break down would need to be required for each affected entity and would provide clarity to the industry. D. We do not agree with a DP and GOP need to be held to the same level of compliance as a RC, BA or TOP. FERC Order 693 (paragraph 487) directed the DP and GOP to be included in this standard by stating;" We expect the telecommunication requirements for all applicable entities will vary according to their roles and that these requirements will be developed under the Reliability Standards development process". A DP and GOP may not be staffed 24 hours a day like a BA or TOP and the SDT did not take this into consideration. E. We understand that the DP and GOP need a means of communicating with their BA and TOP (R7 and R8) but would this not be the same Interpersonal Communications capability that as stated in R3 and R5 for the TOP and BA? Example: If the BA uses a phone line as their Interpersonal Communication medium to contact the DP wouldn't the DP also use the same medium to communicate with their BA? Yes, there could be different mediums but 99% of the time it will be the same medium. F. R10 could mean that if there is a logging system that detects an Interpersonal Communication failure, then all applicable entities will need to monitor that monitoring device. Since this requirement applies to all applicable entities, and Interpersonal Communication mediums will most likely be the same, there will always be two entities found non compliant if the 60 minute threshold is passed.
No
A. Agree that a receiving entity should not be held accountable until such time that they are required to take such action. B. It might if the requirement were going to remain but the Project 2007-03 ("Real-Time Operations SDT") proposed to retire that requirement during their last posting. This needs to be coordinated with that SDT.
No
A. R1, As written it is unclear what level of certification this will entail? Presently written within the NERC Reliability Standards, responsibility is given to RC's to manage the reliability of their areas. Recommend deleting this requirement. The ERO has pushed back in other Standards to having a responsibility for any NERC Requirements, since they are not a user, owner, or operator of the BES (see EOP-004-2). If this does move forward and an RC is certified by the ERO and then the RC is found non-compliant by a Regional Entity, for an associated certified item, will the ERO be held responsible, too? If the SDT selects to keep R1, there are some issues with how the requirement is written. The requirement places emphasis on regions and regional boundaries when no emphasis should be placed there. There are multiple Reliability Coordinators the span multiple regions. The language "to continuously assess transmission reliability" should be changed to "to continuously assess Bulk Electric System reliability" to reflect on what the standards are enforceable. The requirement on the ERO should also be expanded similar to BAL-005-0.1b R1 to ensure that all operating entities and the entire BES is covered under a Reliability Coordinator. B. In R2, should "of" be "to". Reliability Directives are issued to TOPs, BA, etc. C. The VSL for R1 is not consistent with the requirement. The requirement applies to the ERO but the VSL applies to the Regional Entity.

Yes
Yes
<p>A. COM-002-3, R2 As stated in FERC Order 693, section 512, it is essential that RCs, BA's and TOP's have communications with DPs. R2 also applies to TSPs, LSEs and PSEs. There is no directive for this and it is going to be almost impossible to communicate with a DP since DPs are usually not operated 24 hours per day as like a RC, TOP, or BA. Many DPs have answering services that will relay a message once they receive it and then pass it along to someone. An answering company could repeat the directive word for word but this will not add to any reliability level. The SDT should reconsider the applicability section of this Standard to only apply to a RC, TOP and BA for the issuance of a Reliability Directive. BA's should have the responsibility to have an Interpersonal Communication medium with DPs in their BA area per COM-001-2. B. IRO-002-2, R1, Recommend that "System Operators" be replaced with "system operators" since NERC has defined System Operator to be an individual at a control center (BA, TOP, GOP, or RC). The lower cased system operator will only point to the RC system operator that will have this R1 authority. C. The SDT did not address all of our concerns with COM-002-3 from the last posting. For entities registered as multiple functions, the combination of the definition of Reliability Directive and Requirement R1 could be confused to require a company to issue directives to itself. There are several organizations registered as a Reliability Coordinator, Transmission Operator and Balancing Authority. In these companies, it is not uncommon for those responsibilities to be distributed across multiple desks. Thus, for certain situations, a single System Operator may actually be the Reliability Coordinator and the Transmission Operator. In other situations, the System Operator serving the Reliability Coordinator function may be adjacent to the System Operator serving the as the Transmission Operator or Balancing Authority. We believe that it should never be necessary for these System Operators to issue Reliability Directives to themselves in the first example or to their co-worker in the second example to demonstrate compliance to NERC standards. How the entity coordinates its actions among its Reliability Coordinator, Balancing Authority and Transmission Operator roles is a corporate governance issue that should not be confused or complicated by the NERC standards. Thus, we believe that standards should be made clear that the Reliability Directive is directed to another company. D. We also are concerned about the need to conduct three-part communications for a Reliability Directive issued through a blast call. Under these circumstances, the need for immediate action of multiple parties may require a blast call and there may not be time for all parties to complete three-part communications before initiating actions. Thus, we believe blast calls should be treated separately and that should be made clear. E. COM-002-3 R2 needs to be rewritten as it is too verbose. The point is for the recipient of the original message to get the issuer to confirm that the message was understood. We suggest rewording R2 to "Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, Transmission Service Provider, Load-Serving Entity, Distribution Provider, and Purchasing-Selling Entity that is the recipient of a Reliability Directive issued per Requirement R1, shall repeat, restate, rephrase or recapitulate the Reliability Directive." Once the receiver has completed this requirement, the ball is in the issuer's court per Requirement R3. No additional words are necessary in the requirement. F. Per COM-002-3 R1, who decides that actions need to be issued as a Reliability Directive? Shouldn't it be the responsible entity? Thus, can we assume that if the responsible entity does not identify a communication as a Reliability Directive that it is not a Reliability Directive per the requirement? After all, why would an entity require actions but not issue a Reliability Directive. Following this logic, the VSL for R1 would never apply. Would a compliance auditor second guess if an action required a Reliability Directive? G. Because the Project 2007-03 ("Real-Time Operations SDT") proposed to utilize the definition of Adverse Reliability Impact in TOP-001-2 R5 during the last posting, the change to the definition should be coordinated with that team. H. There is a text box in IRO-005-4 that indicates this standard will be retired. Yet, there still remain requirements in the standard and various other associated documentation indicates requirements are being move to this standard. Please delete the text box. I. Please strike part IRO-014-2 Part 1.7. There is no need to have a weekly conference to discuss every Operating Procedure, Operating Process and Operating Plan. As this requirement is written, a conference call would be necessary for each. Furthermore, IRO-014-2 R4 already includes a requirement to have weekly conference calls that should suffice. IRO-014-2 R2 seems to recognize that these Operating Procedures, Processes and Plans likely will not need to be discussed weekly as it only requires an annual update. J. IRO-014-2 R4 is overly broad and would require Reliability Coordinators that will not impact one another to participate on conference calls with one another without any reliability benefit. The issue is created by the addition of the clause "within the same Interconnection" to the requirement. ISO-NE, FRCC, Midwest ISO, and SPP are all in the same Interconnection. It is hard to fathom there being reliability benefit to SPP and ISO-NE conversing weekly or Midwest ISO and FRCC conversing weekly. We suggest limiting the requirement to adjacent Reliability Coordinators. K. For IRO-014-2 R5, we suggest replacing "other" with "impacted" to limit the notification of Adverse Reliability Impacts to only those Reliability Coordinators that need to know. Because the definition of Adverse Reliability Impact includes "Bulk Electric System instability or Cascading", it is possible that the cascading of 138 kV lines serving a load pocket or generator outlet stability issues could require a Reliability Coordinator to notify all other Reliability Coordinators regardless of impact. This would include Reliability Coordinators outside of the Interconnection with the problem. It would also include Reliability Coordinators that are not impacted. For instance, an issue in New England that would not pose a threat outside the northeast would require ISO-NE to notify SPP and FRCC and Reliability Coordinators in the Western Interconnection. There is no reliability benefit to this notification. L. IRO-014-2 R6-R8 are problematic and need to be refined to make clear that the Reliability Coordinators shall operate to the most conservative limit. It should not require a Reliability Coordinator that disagrees with an action plan to implement the action plan. The Reliability Coordinator will</p>

be disagreeing with the action plan for a reliability reasons. Assuming they are correct, the requirement to implement said action plan will actually put the Interconnection at greater risk. These requirements inappropriately attempt to codify the debate and analysis that occurs between and within Reliability Coordinators when there are differing results in reliability analysis. This is part of the problem with having a Wide Area view that results in Reliability Coordinators having a view into other Reliability Coordinator Area. Their results and conclusions may be different. There should be a hierarchical structure for whose results should be used. It should be the Reliability Coordinator with primary responsibility unless the other Reliability Coordinator has evidence to demonstrate that the Reliability Coordinator with primary responsibility is incorrect. What this should do is, to trigger both to review their models and data to assess the problem. None of this needs to be codified in the standards though. M. In the definition of Reliability Directive, we suggest changing "to address an Emergency" to "to address a declared Emergency". This would help limit second guessing for a situation where a System Operator took action because he truly believed he was in an Emergency but after the fact analysis demonstrates there really was not an Emergency. N. The drafting team should expand its rationale for deleting IRO-002-1 R3. Currently, TOP-005 R1 is referenced. The project 2007-03 ("Real-Time Operations SDT") proposed to retire TOP-005-2 R1 in its most recent posting. O. We disagree with deleting IRO-002-1 R5 and R7 which establishes tools and monitoring capabilities. There should be basic tool requirements established for Reliability Coordinators. The project 2009-02 ("Real-time Reliability Monitoring and Analysis Capabilities") will be addressing these issues in more detail. Thus, it does not make sense to delete these requirements until that drafting team completes its task.

Group

FirstEnergy

Sam Ciccone

No

It is not clear from the definition of Interpersonal Communications if certain communications "mediums" such as email, instant messaging, etc. are included. Furthermore, the Measures for these requirements all include "electronic communications" as acceptable evidence. If the drafting team does not intend these mediums be included, then it should be clarified in the definition. We suggest the following wording of the definition: Interpersonal Communication: Any medium that allows two or more individuals to interact, consult, or exchange information. This interaction consists of verbal, spoken words exchanged in Real-time.

Yes

Yes

Yes

Yes

FirstEnergy offers the following additional comments: 1. The effective dates of the standards indicate an effective date of the first day of the first calendar quarter following regulatory approval. The changes to these standards will require changes to existing compliance evidence, as well as the creation of compliance evidence for some entities such as the Generator Operator which is a new applicable entity in COM-001. Therefore, to give entities ample time to get their compliance evidence in place, we suggest the effective state "the first day of the second quarter after regulatory approval". 2. With regard to the requirements for Alternative Interpersonal Communications, we question why the Generator Operator or Distribution Provider is not required to have backup communication. It would be difficult for a Reliability Coordinator, for instance, to contact a Generator Operator whose primary communications have been disabled if that entity does not have a backup. We suggest that the drafting team consider adding the GOP and DP as applicable entities requiring alternative communications.

Group

Midwest ISO Standards Collaborators

Jason Marshall

No

We expressed in the last posting that we felt the definition of Interpersonal Communications might inadvertently include data. The drafting team responded that it does not by referring to Interpersonal in the name of the definition. Clearly, you can't refer the word you are defining to define it. However, it is possible "allows two or more individuals to ..." may solve this problem. What are the drafting team's thoughts on this issue? This standard does not comport with the informational filing that NERC submitted to FERC on August 10, 2009 regarding its discontinued use of sub-requirements in standards development activities. Consider striking "to exchange Interconnection and operating information" in R1, R3, R5, R7, and R8. It is redundant to the use of Interpersonal Communications "to interact, consult, or exchange information" in the definition. Consider striking "to exchange Interconnection and operating information" in R2, R4, R6. It is redundant to the use of Alternative Interpersonal Communications which uses Interpersonal Communications in its definition. Interpersonal Communications includes "to interact, consult, or exchange information" in its definition. For R2. why is Interchange Coordinator excluded? It is included in the Requirement R1 which deals

with the Interpersonal Communications. Communications would need to be maintained with the Interchange Coordinator in the event of a failure of the Interpersonal Communications. For R3, neighboring Transmission Operators should be included. For R4 and R6, the sub-requirement list is different than for than for the associated Interpersonal Communications requirements R3 and R5 respectively. They should be duplicate. That is the sub-requirement list for R4 should match R3 and the R6 should match R5. In the event of a failure of the Interpersonal Communications, the Transmission Operator and Balancing Authority both would need to maintain communications to the same entities as in the requirement to have Interpersonal Communications. For R5, why are neighboring Balancing Authorities not included? They certainly need to be able to contact one another to identify discrepancies in scheduling and sources of meter error that could lead to deviations in ACE. Should R2, R4 and R6 be constructed parallel to R1, R3, and R5? In R1, R3 and R5, the requirement is "shall have" while in R2, R4, and R6, the requirement is "shall designate". Since one is for the Interpersonal Communications and the other is for the Alternative Interpersonal Communications, it seems the same wording should be used. Should R2.2 and R1.2 be limited to Reliability Coordinators in the same Interconnection only? The VSLs for R1 through R8 should be expanded to include multiple levels based on the number of entities that the functional entity does not have Interpersonal Communications or Alternative Interpersonal Communications. FERC specified their general preference for gradated in paragraph 27 of their June 19, 2008 order on VSLs. The second half of the Severe VSL for R9 is almost duplicate to the Lower VSL. There are some small changes in the wording but both situations deal with the case where there is a problem that has been identified with the Interpersonal Communications system and it takes more than two hours to initiate repair.

No

It might if the requirement were going to remain but the Project 2007-03 Real-Time Operations SDT proposed to retire that requirement during their last posting. This needs to be coordinated with that SDT.

No

In general, we are not opposed to the concept of the ERO certifying the Reliability Coordinators; however, there are some issues with how the requirement is written. The requirement places emphasis on regions and regional boundaries when no emphasis should be placed there. There are multiple Reliability Coordinators that span multiple regions. The language "to continuously assess transmission reliability" should be changed to "to continuously assess Bulk Electric System reliability" to reflect on what the standards are enforceable. The requirement on the ERO should also be expanded similar to BAL-005-0.1b R1 to ensure that all operating entities and the entire BES is covered under a Reliability Coordinator Area. In R2, should "of" be "to". Reliability Directives are issued to TOPs, BA, etc. The VSL for R1 is not consistent with the requirement. The requirement applies to the ERO but the VSL applies to the Regional Entity.

Yes

Yes

The SDT did not address all of our concerns with COM-002-3 from the last posting. For entities registered as multiple functions, the combination of the definition of Reliability Directive and Requirement R1 could be confused to require a company to issue directives to itself. There are several organizations registered as a Reliability Coordinator, Transmission Operator and Balancing Authority. In these companies, it is not uncommon for those responsibilities to be distributed across multiple desks. Thus, for certain situations, a single System Operator may actually be the Reliability Coordinator and the Transmission Operator. In other situations, the System Operator serving the Reliability Coordinator function may be adjacent to the System Operator serving the as the Transmission Operator or Balancing Authority. We believe that it should never be necessary for these System Operators to issue Reliability Directives to themselves in the first example or to their co-worker in the second example to demonstrate compliance to NERC standards. How the entity coordinates its actions among its Reliability Coordinator, Balancing Authority and Transmission Operator roles is a corporate governance issue that should not be confused or complicated by the NERC standards. Thus, we believe that standards should be made clear that the Reliability Directive is directed to another company. We also are concerned about the need to conduct three-part communications for a Reliability Directive issued through a blast call. Under these circumstances, the need for immediate action of multiple parties may require a blast call and there may not be time for all parties to complete three-part communications before initiating actions. Thus, we believe blast calls should be treated separately and that should be made clear. COM-002-3 R2 needs to be rewritten as it is too verbose. The point is for the recipient of the original message to get the issuer to confirm that the message was understood. We suggest rewording R2 to "Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, Transmission Service Provider, Load-Serving Entity, Distribution Provider, and Purchasing-Selling Entity that is the recipient of a Reliability Directive issued per Requirement R1, shall repeat, restate, rephrase or recapitulate the Reliability Directive." Once the receiver has completed this requirement, the ball is in the issuer's court per Requirement R3. No additional words are necessary in the requirement. Per COM-002-3 R1, who decides that actions need to be issued as a Reliability Directive? Shouldn't it be the responsible entity? Thus, can we assume that if the responsible entity does not identify a communication as a Reliability Directive that it is not a Reliability Directive per the requirement? After all, why would an entity require actions but not issue a Reliability Directive. Following this logic, the VSL for R1 would never apply. Would a compliance auditor second guess if an action required a Reliability Directive? Because the Project 2007-03 Real-Time Operations SDT proposed to utilize the definition of Adverse Reliability Impact in TOP-001-2 R5 during the last posting, the change to the definition should be coordinated with that team. There is a

text box in IRO-005-4 that indicates this standard will be retired. Yet, there still remain requirements in the standard and various other associated documentation indicates requirements are being move to this standard. Please delete the text box. Please strike part IRO-014-2 Part 1.7. There is no need to have a weekly conference to discuss every Operating Procedure, Operating Process and Operating Plan. As this requirement is written, a conference call would be necessary for each. Furthermore, IRO-014-2 R4 already includes a requirement to have weekly conference calls that should suffice. IRO-014-2 R2 seems to recognize that these Operating Procedures, Processes and Plans likely will not need to be discussed weekly as it only requires an annual update. IRO-014-2 R4 is overly broad and would require Reliability Coordinators that will not impact one another to participate on conference calls with one another without any reliability benefit. The issue is created by the addition of the clause "within the same Interconnection" to the requirement. ISO-NE, FRCC, Midwest ISO, and SPP are all in the same Interconnection. It is hard to fathom there being reliability benefit to SPP and ISO-NE conversing weekly or Midwest ISO and FRCC conversing weekly. We suggest limiting the requirement to adjacent Reliability Coordinators. For IRO-014-2 R5, we suggest replacing "other" with "impacted" to limit the notification of Adverse Reliability Impacts to only those Reliability Coordinators that need to know. Because the definition of Adverse Reliability Impact includes "Bulk Electric System instability or Cascading", it is possible that the cascading of 138 kV lines serving a load pocket or generator outlet stability issues could require a Reliability Coordinator to notify all other Reliability Coordinators regardless of impact. This would include Reliability Coordinators outside of the Interconnection with the problem. It would also include Reliability Coordinators that are not impacted. For instance, an issue in New England that would not pose a threat outside the northeast would require ISO-NE to notify SPP and FRCC and Reliability Coordinators in the Western Interconnection. There is no reliability benefit to this notification. IRO-014-2 R6-R8 are problematic and need to be refined to make clear that the Reliability Coordinators shall operate to the most conservative limit. It should not require a Reliability Coordinator that disagrees with an action plan to implement the action plan. The Reliability Coordinator will be disagreeing with the action plan for reliability reasons. Assuming they are correct, the requirement to implement said action plan will actually put the Interconnection at greater risk. These requirements inappropriately attempt to codify the debate and analysis that occurs between and within Reliability Coordinators when there are differing results in reliability analysis. This is part of the problem with having a Wide Area view that results in Reliability Coordinators having a view into other Reliability Coordinator Areas. Their results and conclusions may be different. There should be a hierarchical structure for whose results should be used. It should be the Reliability Coordinator with primary responsibility unless the other Reliability Coordinator has evidence to demonstrate that the Reliability Coordinator with primary responsibility is incorrect. What this should do is to trigger both to review their models and data to assess the problem. None of this needs to be codified in the standards though. In the definition of Reliability Directive, we suggest changing "to address an Emergency" to "to address a declared Emergency". This would help limit second guessing for a situation where a System Operator took action because he truly believed he was an Emergency but after the fact analysis demonstrates there really was not an Emergency. The drafting team should expand its rationale for deleting IRO-002-1 R3. Currently, TOP-005 R1 is referenced. The Real-Time Operations drafting team proposed to retire TOP-005-2 R1 in its most recent posting. We disagree with deleting IRO-002-1 R5 and R7 which establish tools and monitoring capabilities. There should be basic tools requirements established for Reliability Coordinators. Project 2009-02 Real-time Reliability Monitoring and Analysis Capabilities will be addressing these issues in more detail. Thus, it does not make sense to delete these requirements until that drafting team completes its task.

Individual

Brenda Powell

Constellation Energy Commodities Group

Yes

Yes

Yes

Yes

Yes

Group

Southern Company

Cindy Martin

No

Comments: Standard COM-001-2 R10. Each Reliability Coordinator, Transmission Operator, Balancing Authority, Distribution Provider, and Generator Operator shall notify impacted entities within 60 minutes of the detection of a failure of its Interpersonal Communications capabilities that lasts 30 minutes or longer. Comment: It is not clear whether the notification requirements identified in R10 apply to failure of ALL available Interpersonal Communications

or ANY Interpersonal Communications. We suggest that the existence of functioning Alternative Interpersonal Communications precludes the requirement for notification of impacted entities. D. Compliance 1. Compliance Monitoring Process 1.3 Data Retention Each Generator Operator shall keep the most recent twelve months of historical data (evidence) for Requirements R8 and R10, Measures M8 and M10. Comment: The data retention requirements specified for the Generator Operator in Para. 1.3 (above) are not consistent with the 3-year audit interval for the GOP. Question: When audited on this Standard is the expectation that the GOP will have 12 months of evidence or 36 months of evidence? Standard COM-002-3 R2. Each Balancing Authority, Transmission Operator, Generator Operator, Transmission Service Provider, Load-Serving Entity, Distribution Provider, and Purchasing-Selling Entity that is the recipient of a Reliability Directive issued per Requirement R1, shall repeat, restate, rephrase or recapitulate the Reliability Directive with enough details that the accuracy of the message has been confirmed. Comment: The term "Reliability Directive" is currently not defined in the NERC Glossary of Terms. However, in the Implementation Plan for COM-002-3 the RC SDT proposes a definition for Reliability Directive. It is implied in the standard that the Reliability Directive is issued as a voice command which precludes the use of our preferred method of Interpersonal Communication. However, this is not definitively stated in either the standard or the proposed definition. I think this needs to be made clearer if the Reliability Directive must be issued as a voice command. D. Compliance 1. Compliance Monitoring Process 1.3 Data Retention The Balancing Authority, Transmission Operator, Generator Operator, Transmission Service Provider, Load-Serving Entity, Distribution Provider, and Purchasing-Selling Entity shall retain evidence of Requirement 2, Measure 2 for the most recent 3 months. Comment: The data retention requirements specified for the Generator Operator in Para. 1.3 (above) are not consistent with the 3-year audit interval for the GOP/PSE. Question: When audited on this Standard is the expectation that the GOP and PSE will have 3 months of evidence or 36 months of evidence?

No

Comments: I see no connection between XCEL's comment on COM-001-1. The requirements of COM-001-1 require the RCs, TOPs, and BAs to have a primary interpersonal communications method and to designate an alternative. I believe that if the requirements for the entity to have both primary and alternative methods of interpersonal communications this objection could be cleared. For example, R2 Each Reliability Coordinator shall designate have an Alternative Interpersonal Communications capability with the following entities to exchange Interconnection and operating information

No

Comments: This would allow NERC to designate one entity to be the Reliability Coordinator for an entire interconnection or the entire continent. This would reduce the Regional Reliability Organizations to compliance entities.

Yes

Yes

Comments: It appears that the requirements for entities designated in the IRO standards to have tools to access and/or monitor the system have been moved to pending standards that are not enforceable. It seems that if the newest revisions of the IRO standards are not implemented as a group there will be either missing requirements or duplicate requirements in the IRO standards.

Individual

Greg Rowland

Duke Energy

No

• We question how far the definition of Alternative Interpersonal Communication goes in requiring separate infrastructure from Interpersonal Communication. For example, wireless communications sometime utilize fiber optic networks. • We question why the requirements state that entities must "have" Interpersonal Communications capability, but must "designate" Alternative Interpersonal Communications capability? • R1.2 and R2.2 – Why is this limited to the same interconnection? • R3 – need to add neighboring TOPs. • R5 – need to add adjacent BAs. • Interchange Coordinator – Add IC to the Applicability Section, and add a requirement that the IC have Interpersonal Communication capability with its BA and adjacent BAs. • Requirements to "designate" Alternative Interpersonal Communication should carry a "Medium" VRF instead of "High", because they are a backup capability. The word "designate" carries the connotation that these are documentation requirements. • R9 requires a monthly test of Alternative Interpersonal Communications capability. This was quarterly in the last draft. We question how these requirements for "Alternative Interpersonal Communications" capability are related to requirements for "backup functionality" in EOP-008-1, which requires an annual test of backup functionality. Clarity on the relationship between "Interpersonal Communications", "Alternative Interpersonal Communications", "primary control center functionality" and "backup control center functionality" would be appreciated. • R11 – is this requirement being moved to COM-003? • Data Retention – Is data retention really going to be just 12 months? Most auditors seem to be asking for everything since the last audit.

No

Requirements of TOP-001-1 are being revised under Project 2007-03, which may not continue to adequately address Xcel's concern.

No
How is NERC going to certify the RCs? Also, we believe the word "all" should be inserted after the word "among", so that it's clear that all generation, transmission and load must be included.
Yes
Yes
<p>• COM-002-3 contains the proposed definition "Reliability Directive". We continue to believe Requirement R1 should be deleted and that this definition should contain the phrase "identified as a Reliability Directive to the recipient". Otherwise, compliance controversies will arise when auditors second-guess the RC, TOP or BA's judgment regarding whether or not an abnormal system condition met the definition of "Emergency", and warranted a "Reliability Directive" with 3-part communication. A conforming change will need to be made to R2, since it refers to R1. This change in the definition of "Reliability Directive" is also needed because this term is used in other standards such as IRO-001-2, and without repeating a similar requirement to COM-002-3 requirement R1 in IRO-001-2, there is potential for confusion. • We disagree with the VSL for COM-002-3. This is clearly a requirement with two possible compliance failures: Failure to acknowledge a correct repeat-back, and failure to resolve an incorrect repeat-back. These failures have dramatically different consequences, which the drafting team should recognize via a graduated VSL. We think that the failure to acknowledge should either be "Lower" or "Medium". • Requirement R2 of IRO-001-2 is unclear and should be reworded as follows: "Each Reliability Coordinator shall take actions or direct actions (which could include issuing Reliability Directives to Transmission Operators, Balancing Authorities, Generator Operators, Interchange Coordinators and Distribution Providers within its Reliability Coordinator Area) to either prevent identified events that could result in an Adverse Reliability Impact, or mitigate the magnitude or duration of actual events that result in Adverse Reliability Impacts." • Various changes have been made to the defined term "Adverse Reliability Impact" as this project has progressed. We believe the latest change should not be made, and the Phrase "uncontrolled separation" should be reinserted in the definition, because that phrase is part of the Epect 2005 legislation definition of "reliable operation". Here is the text from the legislation: "The term 'reliable operation' means operating the elements of the bulk-power system within equipment and electric system thermal, voltage, and stability limits so that instability, uncontrolled separation, or cascading failures of such system will not occur as a result of a sudden disturbance, including a cybersecurity incident, or unanticipated failure of system elements."</p>
Group
SPP Standards Development
Robert Rhodes
No
We would suggest that the applicability of COM-001-2 be expanded to that listed in COM-002-3. How can the directives to be issued in COM-002 be delivered and confirmed without having Interpersonal Communications capability? All of the functional entities listed in R1.1 should also be listed in R2.1. Similarly the sub-requirements of R3 should also be applied to R4. The same holds true for R5 and R6. If the SDT intends to exclude data communications from Interpersonal Communications and Alternative Interpersonal Communications, we suggest the SDT be more specific in the definition to specifically exclude data communications in the definition. It is not readily apparent that these terms do not apply to data communications and without a clarification, confusion exists.
Yes
In fact, we believe that R1, R2 and R5 more specifically put that requirement on the TOP. The TOP doesn't have to wait for the RC and any directive that may be associated with R3 prior to taking action to mitigate an emergency condition.
No
Is this more of a registry question than a standards issue? While we agree that there needs to be a requirement somewhere that establishes the need for Reliability Coordinators, isn't there also a similar need for other functional entities such as Transmission Operators, Balancing Authorities, etc? Should these be captured in standards or in the certification/registration process?
Yes
Yes
IRO-001-2, R2 implies that the RC could interrupt the normal chain of command from the TOP and/or BA to their respective GOPs, ICs and DPs thereby circumventing the coordinating process that currently exists. In fact, these entities may not even know their RCs nor be able to identify them and as such any directive from the RC may not be implemented in a timely manner. We would like to see a qualifier on this requirement that does not remove the normal coordination role from the TOP with his DP, etc. We would suggest that "with enough details that the accuracy of the message has been confirmed" be deleted from COM-002-3, R2. We would suggest the use of the term "instruction" and its derivatives rather than 'direct' in IRO-001-2. R2. R3 and R4. Delete 'issue an alert to' in IRO-005-4. R1. There are

yellow boxes in IRO-005-4, redline versions, which indicate that this standard is being retired, but it isn't because two requirements from IRO-001 are being returned to this standard.

Individual

CJ Ingersoll

CECD

No

Based on the drafting teams response that the definition of Interpersonal"clarifies the exclusion of media dedicated to Telemetry or other data exchange,the term Interpersonal Communication should be replaced with verbal communication capabilities. The term Alternative Interpersonal Communication should be replaced with alternative verbal communication capability that is able to serve as a substitute for and does not utilize the same infrastructure (medium) as verbal communications capabilities used for day-to-day operations.

Yes

Yes

Yes

1. COM-002 R2 states that "the recipient of a Reliability Directive issued per Requirement R1, shall repeat, restate, rephrase or recapitulate the Reliability Directive with enough details that the accuracy of the message has been confirmed." Recommend a change to "the recipient of a Reliability Directive issued per Requirement R1, shall repeat, restate, rephrase or recapitulate the Reliability Directive with enough details that the desired outcome of the message is clear". 2. IRO-001 R2 states "Each Reliability Coordinator shall take actions or direct actions which could include issuing Reliability Directives of Transmission Operators," Recommend a change to "Each Reliability Coordinator shall take actions or direct actions which could include issuing Reliability Directives [See COM-002] to Transmission Operators, ..." 3. IRO-001 R4 states entities "shall inform its Reliability Coordinator upon recognition of its inability to perform as directed per Requirement R3." Recommend a change to, entities "shall inform its Reliability Coordinator upon recognition of its inability to perform as directed."

Individual

Rex A Roehl

Indeck Energy Services

No

Yes

No

Yes

Yes

Individual

Shaun Anders

City of Springfield, IL - City Water Light and Power (CWLP)

No

The definition of "Interpersonal Communications" is overly broad and does not address the functional needs of reliability coordination. The definition should be limited to systems utilized for essential reliability functions. While the Purpose statement in the standard does address this intent, the explicit inclusion in the definition removes all ambiguity. Further, the definition of "Alternative Interpersonal Communications" without corresponding explicit definition of Primary Interpersonal Communications may lead to confusion and unnecessary duplication of efforts in testing and maintenance.

No

TOP-001 is in the process of being substantially modified by Project 2007-03. These changes may conflict with the matter addressed by Xcel's comment. Thus, Xcel's concern should be addressed independently but in the context of the TOP-001-2 revisions proposed by Project 2007-03.

Yes

CWLP generally concurs with and supports comments previously submitted by the SERC Operating Committee where those comments are not in conflict with the specific comments above.
Individual
RoLynda Shumpert
South Carolina Electric and Gas
No
Each sub-requirement should not have an "R" in front of the number in order to be consistent with NERC's August 10, 2009 filing at FERC on this subject. Requirement R3 and R4 should include adjacent TOPs as a sub-requirement. Requirements R5 and R6 should include adjacent BAs as a sub-requirement. "to exchange Interconnection and operating information" should be deleted from requirements R1 through R8 as it is redundant with the definition of Interpersonal Communications The last page of the Implementation Plan includes LSEs, PSE, and TSPs as being responsible entities under this standard, yet the standard does not include them. Please correct the implementation plan.
No
Top-001-1, Requirement R3, which is what the SDT appears to be using as its justification for not adding a requirement here is proposed to be deleted by the RTO-SDT on Project 2007-03.
No
We think you are attempting to create a requirement similar to BAL-005, R1. That language copied here is clear and concise - All generation, transmission, and load operating within an Interconnection must be included within the metered boundaries of a Balancing Authority Area.
Yes
Yes
Reliability Directives may be issued by blast calls from Reliability Coordinators. It is inefficient and may be a hindrance to reliability to require 3-part communications in these instances. There are several organizations registered as BAs, RCs and TOPs. It is not uncommon for those entities to be distributed across multiple desks in the same control room without regard to how an entity is registered. Thus, a single System Operator may perform functions that are categorized under two or more of those functional entities. The drafting team should clarify that under no circumstances should that System Operator be required to issue a Reliability Directive to himself. This is a corporate governance issue. In IRO-014, R1, delete sub-requirement 1.7. The requirement for weekly conference calls related to operating procedures is duplicative to R4 and could be burdensome while adding very little value under certain circumstances. In IRO-014, R4, delete the phrase "(per Requirement 1, Part 1.7)" as a conforming change. In IRO-014, Requirements R6-R8 allow at least the theoretical possibility that an RC may determine an Adverse Reliability Impact in another RC's area that the other RC neither can see nor believes that any action should be taken. R7 puts the burden on the first RC to develop a plan that it cannot implement because it has no agreement with the BAs and TOPs in the other RC area. As such, this requirement is unenforceable. Please review all the implementation plans to be sure the applicable entities match those in the standards.
Individual
Dan Rochester
Independent Electricity System Operator
No
(1) NERC filed with FERC on August 10, 2009 indicating that it would discontinue the use of sub-requirements in standards. All draft standards posted since have the format of Part Numbers within each main Requirement. Please revise the standards in this project accordingly. (2) Having defined the terms Interpersonal Communication and Alternative Interpersonal Communication, the phrase "to exchange Interconnection and operating information" in a number of requirements is redundant and can be removed. Further, for R1, we suggest removing the phrase "within the same Interconnection since there RCs between two Interconnections still need to communication with each other for reliability coordination (e.g. curtailment of interchange transactions crossing Interconnection boundary, as stipulated in IRO-006). (3) R2: Suggest to add Purchasing-Selling Entity and Interchange Authority (INT-004 and INT-005 have requirements for communication between the RC and the PSE and IA), and remove the phrase "within the same Interconnection since there RCs between two Interconnections still need to communication with each other for reliability coordination (e.g. curtailment of interchange transactions crossing Interconnection boundary, as stipulated in IRO-006). (4) R3: Suggest to add adjacent Transmission Operator and Purchasing-Selling Entity (the latter needed for meeting INT-004 requirements). (5) The list of entities in R4 and R6 is different from those in R3 and R5. They should be the same for having Alternative Interpersonal Communication capability. (6) R5: Suggest to add adjacent Balancing Authority as adjoining BAs need to communication with each to check schedules and other balancing information. (7)

There are a number of parts in Requirements R1 to R8 each of which must be complied with. However, the VSLs for R1 to R8 are binary which do not provide any distinction in partial failure of each of these requirements. We suggest the SDT to apply the VSL guideline and re-establish the various levels of violation severity for these requirements.

No

TOP-001 is being revised and some of the requirements that fulfill this need may have been removed. We suggest the SDT check with the latest draft version of TOP-001 and coordinate with the Real-time Operation SDT to ensure there are not gaps.

No

1. R2: The word "of" before Transmission Operators should be "to". 2. The VSL for R1 should be revised to replace Regional Entities with ERO.

Yes

Yes

1. IRO-001: Reliability Directive: We do not agree with the proposed definition since it addresses Emergencies only. There are situations where a Reliability Directive is issued such that the directed action must be taken by the receiving entity to address a reliability constraint or any condition on the BES which if left unattended could, in the judgment of the issuing entity, lead to an Emergency. These conditions themselves do not constitute an Emergency which is defined as "Any abnormal system condition that requires automatic or immediate manual action to prevent or limit the failure of transmission facilities or generation supply that could adversely affect the reliability of the Bulk Electric System." There could be no abnormal condition but the actions must nevertheless be taken promptly to prevent the bulk electric system from entering into an abnormal condition. We therefore suggest the term Reliability Directive be revised to: Reliability Directive: A communication initiated by a Reliability Coordinator, Transmission Operator or Balancing Authority where action by the recipient is necessary to address a reliability constraint or an Emergency. 2. IRO-001, Requirement R2: This requirement contains the words "which could include issuing Reliability Directives" which is not referenced anywhere else in the standard. We do not think this inclusion is necessary since without it, R2 already requires that the RC take actions or direct actions by others to prevent identified events or mitigate the magnitude or duration of actual events that result in Adverse Reliability Impacts. Whether or not a Reliability Directive is issued is irrelevant in this requirement. We suggest to remove these words. Note that COM-002 already stipulates the requirement for 3-part communication when a Reliability Directive is issued. The inclusion of "which could include issuing Reliability Directives" in IRO-001 is unnecessary. We suggest replacing "identified events" with "anticipated events". This requirement also lists Interchange Coordinators as one of the recipients of Reliability Directives which is not consistent with the implementation plan. 3. IRO-014: R4 as written creates unnecessary requirements for an RC to participate in conference calls for issues that may not affect the RC itself. We suggest to reinstate the original word "impacted" as opposed to "other", and remove the words "within the same Interconnection" since such calls and coordination may be required for RCs on both side of the Interconnection boundary. Same change suggested for R5, i.e. replace "other" with "impacted". 4. If an entity provides Interpersonal Communication for day-to-day communication using two different media, e.g. radio and telephone, the proposed definition of Alternative Interpersonal Communication suggests that it would not be possible for one medium to be used as the Alternative Interpersonal Communication for the other since the two media are both used every day. 5. COM-001-2 R10 suggests that the responsible entity must wait for at least 30 minutes before notifying other entities of the failure of its Interpersonal Communication capability. We recommend changing "that lasts 30 minutes" to "that lasts or is expected to last 30 minutes". This allows responsible entities to start notifying other entities earlier. 6. In IRO-005-4 R1: Delete "notify".

Individual

Alice Ireland

Xcel Energy

No

We feel that either the definitions, or the requirements, should make it clear whether data is included.

No

We are concerned that the drafting team may not have understood Xcel Energy's comments and FERC's directive in Order 693. FERC had asked that NERC consider Xcel Energy's suggestion. This consideration does not necessarily equate to the development of additional requirements, however that may be the solution. We recognize that R1 and R2 of TOP-001-1 give the TOP authority to take immediate actions necessary to alleviate operating emergencies. We were concerned with the potential situation where the RC's directive (R3 of IRO-001-2) may conflict with actions the TOP has ALREADY taken. In this situation, we do not feel the TOP should be held at fault for the actions it took prior to the RC's directive. (R3 of IRO-001-2 is currently in effect under TOP-001-1 R3.) Additionally, R1 and R2 of TOP-001-1 have been removed from the latest draft of version 2. So, if TOP-001-2 and IRO-001-2 are approved as drafted, it would appear that all rights and protections of the TOP to take immediate actions will be removed and our initial issue, as detailed in Order 693, still exists.

Group
Kansas City Power & Light
Michael Gammon
No
These requirements require TOP's, BA's, and GOP's to establish alternative means of "interpersonal" communications with other BA's, GOP's, and BA's respectively without regard to the reliability impact each TOP, BA or GOP has on the interconnection. Why would it be necessary for a TOP with one 161kv transmission line or a BA with 100 MW of total load, or one GOP with a 30MW unit to realize additional costs when the facilities they operate have little reliability impact? In addition, most RC's have established satellite telephone systems as back-up communication with TOP's. RC's may have to establish additional communication systems with BA's as these requirements impose to avoid Standards of Conduct issues. R9 – considering the reliability of communication systems, a 2 hour response to a problem with the alternative means of communication is over sensitive. Allowing for sometime in an operating shift would be more in line, such as 8 hours.
Yes
Yes
Yes
Yes
There are more requirements that are being removed in the IRO standards than are currently proposed. It would be helpful if the SDT would consider a mapping of each requirement that is being eliminated and whether the requirement is duplicated elsewhere, moved elsewhere and where, or is deemed not needed would be helpful in judging if the changes are appropriate. Without this mapping it is difficult to fully support all the proposed changes to all these Standards.