

- Name (25 Responses)
- Organization (25 Responses)
- Group Name (16 Responses)
- Lead Contact (16 Responses)
- Question 1 (32 Responses)
- Question 1 Comments (41 Responses)
- Question 2 (31 Responses)
- Question 2 Comments (41 Responses)
- Question 3 (30 Responses)
- Question 3 Comments (41 Responses)
- Question 4 (0 Responses)
- Question 4 Comments (41 Responses)

Individual
Alice Ireland
Xcel Energy
Yes
Yes
Yes
Individual
Thad Ness
American Electric Power
Yes
Yes
The definition of Alternative Interpersonal Communication is "Any Interpersonal Communication that is able to serve as a substitute for, and does not utilize the same infrastructure (medium) as, Interpersonal Communication used for day-to-day operation." Does the Alternative Interpersonal Communication have to be a different technology? For example, if a satellite phone is used, but it calls the same land-line on the other end, does this qualify as Alternative Interpersonal Communication? How does a TOP notify a DP of a failure in its Interpersonal Communications capability per R10, if it there is no Alternative Interpersonal Communication required? Within Requirement 10, the entities to be notified should not reference R1, R3, and R5 but should instead reference R2, R4, and R6 respectively. This change is necessary because the requirements we are referring to are those that have Alternative Interpersonnel Communications. You cannot expect notification to entities where an Alternative Interpersonnel Communication does not exist.
Group
Arizona Public Service Company
Janet Smith, Regulatory Affairs Supervisor
Yes
Yes
Yes

None
Group
FirstEnergy
Sam Ciccone
Yes
Yes
Yes
FE supports COM-001-2 and has no further comments. PLEASE NOTE: THE FOLLOWING COMMENTS RELATE TO COM-002-3 AND IRO-001-3 SINCE WE WERE NOT ABLE TO PROVIDE COMMENTS ON THE RECIRCULATION BALLOT AND WANTED TO EXPLAIN OUR REASONS FOR NOT SUPPORTING THOSE STANDARDS: Although we believe the team made significant improvements to the standard, and would support a 3-part communication standard, we believe the introduction of both COM-002-2 which utilizes Reliability Directives and COM-003-1 which utilizes Operating Communications cause confusion for system operators and may in fact be detrimental to reliability. We do not support two standards on three-part communication. We suggest, as we have in the past, that the subject of three-part communication be addressed in a single standard, and that the requirements be developed for simplicity. The industry is, and has been, using three-part communication for decades and although we agree it should be more consistently practiced and standardized, the required communications protocols should be simple while meeting the goal of BES reliability. Introducing complicated requirements and standards that have different definitions such as Reliability Directive and Operating Communication may cause the operator to hesitate when issuing directives in real-time and every second counts when a potential system emergency must be mitigated. Therefore, FE does not support the creation of both COM-003-1 nor the revisions to COM-002-2 and IRO-001-3 which introduce the "Reliability Directive" term and ask NERC to reevaluate the need to have two separate standards for three-part communication.
Group
PacifiCorp
Sandra Shaffer
No
No
PacifiCorp does not understand the RCSDT's rationale for creating separate sub-requirements for adjacent Transmission Operators that are synchronously and asynchronously connected, in both R3.5/R3.6 and R4.3/R4.4. PacifiCorp recommends the following singular sub-requirement for both R3 and R4: "Each adjacent Transmission Operator (whether synchronously or asynchronously connected)."
Yes
N/A
Individual
John Seelke
Public Service Enterprise Group
Yes
Yes
Yes
Change R11 and replace "experiences a failure" with "detects a failure" because one may have a

failure, but if it's undetected for some period of time because no communications are taking place, it's unclear when one actually "experienced a failure." We note that R10 uses the terminology "detection of a failure." Using consistent terminology in R10 and R11 would result in less confusion for compliance because there would not be an issue as to whether a difference was intended by the SDT between "experiences" and "detects" in the two requirements.

Individual

David Thorne

Pepco Holdings Inc

Yes

Yes

Yes

Individual

Karen Webb

City of Tallahassee (TAL)

Yes

Yes

Yes

For Measure 7, the first line duplicates the word "that".

TAL has no comments on COM-001-2. However, for COM-002-3, under Data Retention, the second bullet requires the BA, TOP, GOP, and DP to retain evidence for R1, M1; however, R1 is not applicable to the GOP or DP. This should read R2, M2. Also, there is room for debate on the clarity of the VSLs for R3. Specifically, the use of the word "accurately" could be interpreted to mean "verbatim" in cases where varying verbiage results in the same understanding and action between the parties, and therefore no re-issuance of the directive is required in the eyes of the issuer.

Individual

Andrew Gallo

City of Austin dba Austin Energy

Yes

Yes

(1) Both instances of "Reliability Coordinator" in the VSLs for R3 should be "Transmission Operator" to match the language of the standard. (2) Both instances of "Reliability Coordinator" in the VSLs for R5 should be "Balancing Authority" to match the language of the standard. (3) In the VSLs for R9 and R10 the use of "and" seems incorrect. Austin Energy suggests the following revisions for all VSL levels (only the Lower VSL shown for simplicity and revised words suggested in capital letters): R9, Lower VSL: "The Reliability Coordinator, Transmission Operator, OR Balancing Authority..." R10, Lower VSL: "The Reliability Coordinator, Transmission Operator, OR Balancing Authority failed to notify the entities identified in Requirements R1, R3, OR R5, RESPECTIVELY, upon the detection ..."

Individual

Kasia Mihalchuk

Manitoba Hydro

Yes

Yes

Yes

Manitoba Hydro would like additional clarification added to the definition of interpersonal communication. The definition should explicitly state that interpersonal communication does not data links (e.g. the ICCP data link). Also, does interpersonal communication include emails? Under the Effective Date Section, the effective date language has a few issues in its drafting. It would be clearer to use the word 'following' as opposed to the word 'beyond' (and this would also be more consistent with the drafting of similar sections in other standards). The words 'the standard becomes effective' in the third line are not needed. The words 'made pursuant to the laws applicable to such ERO governmental authorities' may not be appropriate. It's not the laws applicable to the governmental authorities that are relevant, but the laws applicable to the entity itself. We would suggest wording like 'or as otherwise made effective pursuant to the laws applicable to the Balancing Authority'. Also, ERO is not defined. R11 and M11 – would suggest replacing 'action' with 'plan of action' or 'action plan' M3 and M4 – the word 'and' between asynchronously and synchronously should more appropriately be 'or' M10 – the semi colon after stamped should be deleted Compliance Section – Compliance Enforcement Authority is defined as CEA, but then both the acronym and the entire term is later used in the document. Should either not define, or use acronym consistently.

Individual

Steve Alexanderson P.E.

Central Lincoln

Prior Central Lincoln Comment 1) The new requirement presents us with a paradoxical situation. The communication has failed, so we must consult; yet consultation requires communication. We note that the SDT used the word "any", implying that multiple communication paths are required. The reality of the situation at Central Lincoln, due to our remote location, is that a single back hoe incident at the right location can take out all of our of our communication capability (including the terrestrial portion of the cellular networks) with our BA/TO; making this requirement impossible to meet for this circumstance using our present capabilities. Prior RCSDT Response 1) The RCSDT appreciates your comment and has made clarifying changes by removing the phrase "any of" in COM-001, R11. Additionally, the RCSDT made a clarifying change to indicate the DP and GOP only need to consult with the entity affected by the failure. Furthermore, R11 addresses the direction given in Order 693 that DP and GOP entities do not necessarily need to have Alternative Interpersonal Communication capability. The requirement allows flexibility in "consult with" by not naming the method. If all communications are out, then the DP or GOP may have to meet the requirement by an in-person consultation. New Central Lincoln Response 1) Thank you for the changes made. We realize that in-person consultation is an option, but find it not too hard to imagine the same event that disrupts communications might also block roads. We don't believe entities should be found non-compliant and sanctioned for events beyond their control. Prior Central Lincoln Comment 2) We also note that no time limit was indicated. Most interruptions are brief, and fixed before consultation could reasonably take place. CEAs will be finding entities non-compliant for quickly fixing problems at their end without first consulting to ensure the restoration time was agreeable. To avoid non-compliance, entities will be forced to delay repairs while they investigate alternative communication paths for consultation purposes. We fail to see how such an outcome improves reliability. Prior RCSDT Response 2) The DP and GOP are only required to have Interpersonal Communication capability. If the DP or GOP restores its Interpersonal Communication capability before it could reasonably contact the affected entity by another method, there is no failure to comply. The DP or GOP could then consult with the affected entity to determine a mutually agreeable action. In this case, the RCSDT believes the "action" would then be the entities acknowledging the failure and the repair; therefore, no mutually agreeable action is needed. The RCSDT recognizes there is no way to account for all the various circumstances in a failure. To comply, the DP and GOP are still required to consult the entity which the failure affected regardless of whether the Interpersonal Communication capability was restored or is still failed. No change made. New Central Lincoln Response 2) If consultation after restoration is acceptable, we

suggest that this be made clear in the requirement. Presently it is not at all clear, and there is no accompanying guidance document to suggest so. We also remain unclear what reliability benefit would result from such a consultation following restoration. While accounting for all the various failures might be impossible, we would like to see a few of the more common ones discussed in a guidance document. Prior Central Lincoln Comment 3) The new requirement is one sided, requiring the DP and GOP to consult with no corresponding requirement for the TO or BA to have personnel available for such a consultation. Consultation failure or failure to mutually agree due to actions or inactions on the part of the TO or BA should not result in an enforcement action against the DP or GOP, yet that is how the requirement is written. Prior RCSDT Response 3) The RCSDT notes that once the failure has been detected, the responsible entity must make the consultation with the BA or TOP; that relieves the compliance burden. While the RCSDT understands your concern about single points of failure, the question becomes should this relieve the DP or GOP of the requirement for having Interpersonal Communication capabilities. No change made. New Central Lincoln Response 3) The requirement remains one-sided. If a consultation effort fails due to actions or inactions taken by the BA/TO, the DP or GOP is the only entity that can be found non-compliant. Prior Central Lincoln Comment 4) The new requirement fails to add any "clarity" to the other requirements, and we don't see that the stakeholders thought there was a problem with DP/GOP obligation clarity. Instead, it adds new obligations with no justification for how they enhance reliability. We suggest removing the requirement. Prior RCSDT Response 4) Based on the RCSDT's understanding of the comments received on the previous posting, the industry desired additional clarity on specifically what communication capabilities the DP and GOP were required to have. There was confusion that the standard did not specifically say that the DP and GOP were required to have Alternative Interpersonal Communication capabilities. R11 clarifies that a DP and GOP are not required to have Alternative Interpersonal Communication capability if the DP or GOP consult with their TOP or BA, whichever is applicable in the given situation, and they mutually agree that the restoration action does not adversely impact the reliability of the BES. No change made. New Central Lincoln Response 4) We disagree that R11 clarifies anything regarding Alternative Interpersonal Communication capabilities; the requirement says nothing on the matter. If other requirements remain unclear, we suggest they be clarified within those requirements. We ask that R11 be removed. Alternatively we suggest that a plan for communication failure be developed by the affected entities prior to a failure, applicable to both the BA/TO and DP/GOP. Prior Central Lincoln Comment 5) As stated in our prior comments, we continue to have problems with COM-002, R2 and R3 as written. The SDT's answer ("It is the expectation that an issuer of a Reliability Directive would request a return call by the Distribution Provider operating personnel, then issue the Reliability Directive") addresses our concern perfectly, and we would agree with such an expectation. Unfortunately, the expressed expectation is not in the proposed standard or even in a proposed guideline for the standard. Prior RCSDT Response 5) The RCSDT believes this is a process or procedure question that should be determined by the entity in how it handles communication with the RC. The standard, as written does, not preclude the entity from having a procedure. No change made. New Central Lincoln Response 5) We agree that this is a procedure issue, but disagree that the procedure lies with the entity receiving the Reliability Directive. The SDT's words inside the quotation marks above state it is the issuer of the Directive that should request a return call. Procedures like this, in order to ensure the Directive gets to the party who understands it and can take the needed action, are the responsibility of the issuer. If reliability is at risk, it is little to ask that issuers of Reliability Directives be required to attempt to reach the proper party prior to identifying, delivering the directive, and asking for repetition.

Individual
Michelle D'Antuono
Ingleside Cogeneration LP (Occidental Chemical in the ballot body)
Yes
Ingleside Cogeneration LP agrees that the modification removes all doubt that a glossary definition is inferred. We support all clarifications of this kind.
Yes
No
Ingleside Cogeneration LP would like to see the project team include references to intermediaries which act as a single point of contact between GOPs and BAs/TOPs. This is a very common and

necessaray communications hierarchy – as it is just not possible for the BA/TOP to otherwise coordinate the actions of multiple GOPs. We believe that it is appropriate that GOP must retain evidence that Interpersonal Communication capability is maintained up to the intermediary – but the BA or TOP must be responsible for the remainder of the link. This accountability matches the most common contractual arrangements where both the BA/TOP and the GOP have signed agreements with the intermediary.

Ingleside Cogeneration LP generally agrees with the modifications that the SDT has made to COM-001-2. However, we cannot vote to accept the standard unless requirement R10 is modified to include a minimum communications outage duration before consultation with the BA or TOP is necessary. This is similar to R10, which allows an outage to extend up to 30 minutes – thus avoiding the need for a notification that an insignificant interruption in service took place. The following language could be added to R11 as shown in the brackets below: R11. Each Distribution Provider and Generator Operator that experiences a failure of its Interpersonal Communication capability [that lasts 30 minutes or longer] shall consult each entity affected by the failure, as identified in Requirement R7 for a Distribution Provider or Requirement R8 for a Generator Operator, to determine a mutually agreeable action for the restoration of its Interpersonal Communication capability.

Group
SERC OC Standards Review Group
Gerald Beckerle
Yes
Yes
Yes

The SERC OC SRG would like to thank the Standard Drafting Team for their service. “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
Laura Lee
Duke Energy
Yes
Yes
Yes

Distribution Providers and Generator Operators have significant responsibilities that require reliable means of communications with other entities, such as implementing load shedding and adjusting real and reactive power. The requirements for the Distribution Provider and Generator Operator should therefore be consistent with those for the Reliability Coordinator, Transmission Operator and Balancing Authority, namely, they should be required to designate Alternative Interpersonal Communication capability, to test this capability and to notify appropriate entities when its Interpersonal Communication capability has failed. The definition of Interpersonal Communication should also be expanded to clearly include the drafting team’s intent that the capability is NOT for the exchange of data.

Group
Bonneville Power Administration
Chris Higgins

BPA thanks you for the opportunity to comment on Project 2006-06, COM-001-2 and has no comments or concerns at this time.
Group
Luminant
Brenda Hampton
Yes
Yes
Yes
Individual
Don Jones
Texas Reliability Entity
Yes
“Adjacent Balancing Authority” is a defined term in the NERC Glossary, and use of the non-defined term “adjacent Balancing Authority” in this draft will cause confusion. Exactly what difference is intended by using the lower-case “a” instead of the defined term?
No
The proposed revision to include Transmission Operators asynchronously connected (Parts 3.5 and 4.4) is an appropriate revision to the Standard. The Reliability Coordinator responsibilities for communications with a Reliability Coordinator across an asynchronous connection do not appear to be addressed in this revision. Did the RCSDT have a particular reason not to address the RC issue? We believe each RC should have Interpersonal Communication capability with all neighboring RCs regardless of Interconnection boundaries, the type of connection, or whether a connection exists.
Yes
In the Measures for R3 and R4 (M3 and M4), should the phrase “each adjacent Transmission Operator asynchronously AND synchronously connected” be changed to “each adjacent Transmission Operator asynchronously OR synchronously connected”? In the VSLs for R3 it appears that “Reliability Coordinator” should be “Transmission Operator”. In the VSLs for R5 it appears that “Reliability Coordinator” should be “Balancing Authority”. In the Severe VSL for R10 the phrase “failed to notify the identified entities identified” should probably be “failed to notify the entities identified”.
Group
Western Electricity Coordinating Council
Steve Rueckert
Yes
Yes
Yes
Group
Dominion
Connie Lowe
Yes

Yes
Yes
<p>Dominion has no additional comments on COM-001-2, but does have the below comments on IRO-001-3: Dominion believes that our previous comment remains valid and the response provided by the SDT does not address all aspects of our concerns. Dominion suggests that the language of 'direction' be changed to 'Reliability Directive' to remain consistent with COM-002. Another alternative would be as written below; IRO-001-3 uses the term 'direct' in its purpose statement, R1, R2 and R3. To avoid confusion with a Reliability Directive (both for auditors and entities), we suggest the following: To establish the authority of Reliability Coordinators to make requests of other entities to prevent an Emergency or Adverse Reliability Impacts to the Bulk Electric System. R1: Each Reliability Coordinator shall have the authority to act or request others to act (which could include issuing Reliability Directives) to prevent identified events or mitigate the magnitude or duration of actual events that result in an Emergency or Adverse Reliability Impacts. R2: Each Transmission Operator, Balancing Authority, Generator Operator, and Distribution Provider shall comply with its Reliability Coordinator's request unless compliance with the request cannot be physically implemented, or unless such actions would violate safety, equipment, regulatory or statutory requirements, or unless the TOP, BA, GOP or DP convey a business reason not to comply with the request but express that they will comply if a Reliability Directive is given. R3: Each Transmission Operator, Balancing Authority, Generator Operator, and Distribution Provider shall inform its Reliability Coordinator upon recognition of its inability to perform as requested in accordance with Requirement R2." Or we could cite Southwest Transmission Cooperative, Inc. comments which read "COM-002-3 R1 really compels the Reliability Coordinator to use a Reliability Directive for Emergencies and Adverse Reliability Impacts with the opening clause: "When a Reliability Coordinator, Transmission Operator, or Balancing Authority determines actions need to be executed as a Reliability Directive." What else could be more important for a Reliability Coordinator to issue a Reliability Directive than for an Emergency or Adverse Reliability Impact? Thus, not requiring the use of Reliability Directives for Adverse Reliability Impacts and Emergencies makes IRO-001-3 R1 and COM-002-3 R1 inconsistent. For clarity and consistency, IRO-001-3 Requirement R2 and R3 should also be clear that the responsible entities will respond to the Reliability Coordinator's Reliability Directives.</p>
Individual
John Brockhan
CenterPoint Energy Houston Electric, LLC
Yes
Yes
Yes
<p>1. For R10, there can be a large number of entities to notify for an Interpersonal Communication failure. During normal operations, 60 minutes can be enough time to make all the notifications. However, during emergency or adverse conditions, 60 minutes may not be sufficient. Thus, at the end of R10, the following should be added: "unless certain adverse conditions (e.g. severe weather, multiple events) prevent the completion of notification within the 60 minutes." 2. For R11, the change from "mutually agreeable time" to "mutually agreeable action" is not an improvement. It should not be the concern of the other entities how (what action) the capability is restored, only that it is restored and that the entity with the failure can be reached in the interim. Thus, we suggest the following: "to determine a mutually agreeable alternative until Interpersonal Communication capability is restored."</p>
Individual
Michael Falvo
Independent Electricity System Operator
Yes

Notwithstanding our opposition to R1.2.
Yes
Yes
Notwithstanding our opposition to R1.2.
<p>1. COM-001 We continue to disagree with R1.2, the phrase “within the same Interconnection” is troublesome. RCs between two Interconnections still need to communicate with each other for reliability coordination (e.g. between Quebec and the other RCs in the NPCC region to curtail interchange transactions crossing Interconnection boundary). The SDT’s previous response that the phrase was added to address the ERCOT situation and citing that ERCOT does not need to communicate with other RCs leaves a reliability gap. The SDT’s latest response that R1 as written does not preclude or limit the Reliability Coordinator from establishing Interpersonal Communication capability with others is inconsistent with the basic principle for having a reliability standard. A standard should stipulate the requirements based on what is needed to ensure reliability, not on what is not precluded. If there is a reliability need for RCs across Interconnection boundary to coordination operations, then Interpersonal Communication shall be provided. If we apply the SDT’s philosophy (that the standard does not preclude...), then one can argue that the standard does not need to stipulate a requirement to have Interpersonal Communication as without such a requirement, the standard does not preclude any operating entities to have it. Finally, we would reiterate the fact that RCs between asynchronously interconnected systems do communicate, e.g. between Quebec and its neighbor RCs. We are also aware that RCs in the Western Interconnection and those in the Eastern Interconnection do communicate as needed to coordinate TLR for transactions crossing Interconnection boundary. 2. The follow comments address data retention for COM-002-3: a. The first bullet in Section D1.3 stipulates that “The Reliability Coordinator, Transmission Operator, and Balancing Authority shall retain evidence of Requirement R1 and R3, Measure M1 and M2 for the most recent 3 calendar months.” We believe M2 should be M3. b. The second bullet: “The Balancing Authority, Transmission Operator, Generator Operator, and Distribution Provider shall retain evidence of Requirement R1, Measure M1 for the most recent 3 calendar months.” We believe R1 and M1 should read R2 and M2 since DP is only responsible for meeting R2. c. Section 2 “Violation Severity Levels” : R# R2 Severe includes the Balancing Authority as one of the listed entities; however this is inconsistent with R2 / M2 which do not include the Balancing Authority. To be consistent with R2 / M2, the Balancing Authority should be removed from VSL R# R2. While these can be regarded as typos, and do not contribute to a show-stopper vote for some, we urge the SDT and the Standards Committee to pay closer attention to the accuracy of all elements in the standard. 3. IRO-001-3: o Section 1.3 Data Retention (second bullet) states: ♣ The Operator, Balancing Authority, Generator Operator, or Distribution Provider shall retain for Requirements R2 and R3, Measures M2 and M3 shall retain voice recordings for the most recent 90 calendar days or documentation for the most recent 12 calendar months. • The statement above appears to be missing “Transmission” before the word Operator. • The statement above repeats “shall retain” and the highlighted instance is not required. • The statement above states “or” Distribution provider, implying that one entity needs to retain evidence. Starting the sentence with “Each” rather than “The” and replacing “or” with “and” may provide clarity. The same would apply to the introduction sentence prior to the bullets. COM-002-3 section D. Compliance 1.3 Data Retention provides an example of the suggested format. ♣ Here is an example of the revised sentence: “Each Transmission Operator, Balancing Authority, Generator Operator, and Distribution Provider shall retain voice recordings for the most recent 90 calendar days or documentation for the most recent 12 calendar months, for Requirements R2 and R3, Measures M2 and M3”.</p>
Group
Detroit Edison
Kent Kujala
Defining Interpersonal Communication as “Any medium that allows two or more individuals to interact, consult, or exchange information” will also include all Alternative Interpersonal Communications since “Any medium” is all inclusive. Consider replacing the definition of Interpersonal

Communication with the following: Primary Interpersonal Communication: The normal communication medium that two or more individuals use to interact, consult, or exchange information relating to day-to-day operations. Consider replacing the definition of Alternative Interpersonal Communication with the following: Alternative Interpersonal Communication: Any communication medium that is able to serve as a substitute for, and does not utilize the same infrastructure (medium) as the designated Primary Interpersonal Communication. R1, R3, R5, R7, R8 should require entities to designate Primary Interpersonal Communication. R10 and R11 should address failures to designated Primary and Alternate Interpersonal Communication. R9 in all VSL levels the phrase "failed to initiate action to repair" or designate a replacement is subject to interpretation. Does "initiate action" include notification to the proper party to investigate and repair or does it require repairs to begin within specified times as listed in severity levels?

Individual

Steve Alexanderson P.E.

Central Lincoln

Prior Central Lincoln Comment 1) The new requirement presents us with a paradoxical situation. The communication has failed, so we must consult; yet consultation requires communication. We note that the SDT used the word "any", implying that multiple communication paths are required. The reality of the situation at Central Lincoln, due to our remote location, is that a single back hoe incident at the right location can take out all of our of our communication capability (including the terrestrial portion of the cellular networks) with our BA/TO; making this requirement impossible to meet for this circumstance using our present capabilities. Prior RCSDT Response 1) The RCSDT appreciates your comment and has made clarifying changes by removing the phrase "any of" in COM-001, R11. Additionally, the RCSDT made a clarifying change to indicate the DP and GOP only need to consult with the entity affected by the failure. Furthermore, R11 addresses the direction given in Order 693 that DP and GOP entities do not necessarily need to have Alternative Interpersonal Communication capability. The requirement allows flexibility in "consult with" by not naming the method. If all communications are out, then the DP or GOP may have to meet the requirement by an in-person consultation. New Central Lincoln Response 1) Thank you for the changes made. We realize that in-person consultation is an option, but find it not too hard to imagine the same event that disrupts communications might also block roads. We don't believe entities should be found non-compliant and sanctioned for events beyond their control. Prior Central Lincoln Comment 2) We also note that no time limit was indicated. Most interruptions are brief, and fixed before consultation could reasonably take place. CEAs will be finding entities non-compliant for quickly fixing problems at their end without first consulting to ensure the restoration time was agreeable. To avoid non-compliance, entities will be forced to delay repairs while they investigate alternative communication paths for consultation purposes. We fail to see how such an outcome improves reliability. Prior RCSDT Response 2) The DP and GOP are only required to have Interpersonal Communication capability. If the DP or GOP restores its Interpersonal Communication capability before it could reasonably contact the affected entity by another method, there is no failure to comply. The DP or GOP could then consult with the affected entity to determine a mutually agreeable action. In this case, the RCSDT believes the "action" would then be the entities acknowledging the failure and the repair; therefore, no mutually agreeable action is needed. The RCSDT recognizes there is no way to account for all the various circumstances in a failure. To comply, the DP and GOP are still required to consult the entity which the failure affected regardless of whether the Interpersonal Communication capability was restored or is still failed. No change made. New Central Lincoln Response 2) If consultation after restoration is acceptable, we suggest that this be made clear in the requirement. Presently it is not at all clear, and there is no accompanying guidance document to suggest so. We also remain unclear what reliability benefit would result from such a consultation following restoration. While accounting for all the various failures might be impossible, we would like to see a few of the more common ones discussed in a guidance document. Prior Central Lincoln Comment 3) The new requirement is one sided, requiring the DP and GOP to consult with no corresponding requirement for the TO or BA to have personnel available for such a consultation. Consultation failure or failure to mutually agree due to actions or inactions on the part of the TO or BA should not result in an enforcement action against the DP or GOP, yet that is how the requirement is written. Prior RCSDT Response 3) The RCSDT notes that once

the failure has been detected, the responsible entity must make the consultation with the BA or TOP; that relieves the compliance burden. While the RCSDT understands your concern about single points of failure, the question becomes should this relieve the DP or GOP of the requirement for having Interpersonal Communication capabilities. No change made. New Central Lincoln Response 3) The requirement remains one-sided. If a consultation effort fails due to actions or inactions taken by the BA/TO, the DP or GOP is the only entity that can be found non-compliant. Prior Central Lincoln Comment 4) The new requirement fails to add any "clarity" to the other requirements, and we don't see that the stakeholders thought there was a problem with DP/GOP obligation clarity. Instead, it adds new obligations with no justification for how they enhance reliability. We suggest removing the requirement. Prior RCSDT Response 4) Based on the RCSDT's understanding of the comments received on the previous posting, the industry desired additional clarity on specifically what communication capabilities the DP and GOP were required to have. There was confusion that the standard did not specifically say that the DP and GOP were required to have Alternative Interpersonal Communication capabilities. R11 clarifies that a DP and GOP are not required to have Alternative Interpersonal Communication capability if the DP or GOP consult with their TOP or BA, whichever is applicable in the given situation, and they mutually agree that the restoration action does not adversely impact the reliability of the BES. No change made. New Central Lincoln Response 4) We disagree that R11 clarifies anything regarding Alternative Interpersonal Communication capabilities; the requirement says nothing on the matter. If other requirements remain unclear, we suggest they be clarified within those requirements. We ask that R11 be removed. Alternatively we suggest that a plan for communication failure be developed by the affected entities prior to a failure, applicable to both the BA/TO and DP/GOP. Prior Central Lincoln Comment 5) As stated in our prior comments, we continue to have problems with COM-002, R2 and R3 as written. The SDT's answer ("It is the expectation that an issuer of a Reliability Directive would request a return call by the Distribution Provider operating personnel, then issue the Reliability Directive") addresses our concern perfectly, and we would agree with such an expectation. Unfortunately, the expressed expectation is not in the proposed standard or even in a proposed guideline for the standard. Prior RCSDT Response 5) The RCSDT believes this is a process or procedure question that should be determined by the entity in how it handles communication with the RC. The standard, as written does, not preclude the entity from having a procedure. No change made. New Central Lincoln Response 5) We agree that this is a procedure issue, but disagree that the procedure lies with the entity receiving the Reliability Directive. The SDT's words inside the quotation marks above state it is the issuer of the Directive that should request a return call. Procedures like this, in order to ensure the Directive gets to the party who understands it and can take the needed action, are the responsibility of the issuer. If reliability is at risk, it is little to ask that issuers of Reliability Directives be required to attempt to reach the proper party prior to identifying, delivering the directive, and asking for repetition.

Group

SPP Standards Review Group

Robert Rhodes

Yes

Yes

Yes

There are a couple of cut & paste errors in the VSLs for R3 and R5. In R3, Reliability Coordinator in the High and Severe VSLs should be replaced with Transmission Operator. In R5, Reliability Coordinator in the High and Severe VSLs should be replaced with Balancing Authority.

Individual

Andrew Z. Pusztai

American Transmission Company

Yes

Yes

Yes
Individual
Daniel Duff
Liberty Electric Power
Yes
Yes
Yes
R11 remains an issue even with the revision. The purpose of R11 should be to inform the BA and TO of a loss of interpersonal communications capability so that the BA or TO can react effectively to grid conditions in an emergency. The methods of repair for generator telephone and data lines are properly the business decisions of the generator, and there is no benefit to the reliability of the BES if a standard requires a generator to attempt to gain consensus from the BA and TO on his repair actions. Taking the time to discuss a "mutually agreed action" will delay the start of repairs, and lengthen the time of a communications outage as generators first must discuss the issue with the BA and TO instead of initiating the action on their own and informing those entities of the failure. Further, failure to follow a mutually agreed action plan could become a topic of exploration for audit staff. As telecommunications repairs are generally not in the scope of expertise of electrical generators, this places the entities at the mercy of contractor repair schedules, making following any mutually agreed action problematic. Further, there is no duration trigger on R11, as opposed to the RC/TO/BA requirement in R10. This forces the generator to inform the listed entities even of losses of capability which last a handful of seconds. If a small generator has a single line into the control room, and the control room operator is on the phone to the TOP, does he then have to inform the TO and BA at the end of the call that they would have received a busy signal? If the operator knocks the phone from the cradle, is the requirement to inform triggered? In a strict reading of the language, it would be. Suggested rewrite of R11: " Upon discovery of an unresolved loss of interpersonal communications which has the potential to last more than 15 minutes, the GOP shall inform the entities listed in R8 of the status of interpersonal communications. The GOP shall initiate the process to restore the interpersonal communications, and inform the entities listed in R8 of the restoration of communications when repairs are complete. "
Group
MRO NSRF
WILL SMITH
Yes
Yes
Yes
: The NSRF understands the importance of Interpersonal Communications and Alternate Interpersonal Communications and always having the ability to communicate with others. The NSRF questions why per R9 (and similar time requirement per R10) that when testing the Alternate Interpersonal Communications is unsuccessful, why there is a two hour time limit to initiate an action, repair, or designate a replacement. Project 2012-08.1 defines "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 Cyber Security Incident, or unanticipated failure of system Elements. The loss of an Alternate Interpersonal Communication will not

immediately impact the Reliable Operations of the BPS. Recommend that this not be contained within the Standard as entity's will view this as a Good Utility Practice. R10 The NSRF recommends that "applicable" be inserted between "...notify entities..." . This will assure that RC's will inform per R1, TOP's will inform per R3 and BA's will inform per R5. This will assure that an interpretation is not require as in Interpretation 2010-INT-01, TOP-006.

Group

Northeast Power Coordinating Council

Guy Zito

Yes

No

If 3.5 and 4.3 were made to read: "Each connected adjacent Transmission Operator." then 3.6 and 4.4 (not 3.4 as indicated in the question) would not be required. If 3.6 and 4.4 are to be kept, then the wording of 3.6 and 4.4 should be made to read: "Each adjacent Transmission Operator asynchronously connected through a DC tie." Systems cannot be asynchronously connected.

Yes

Group

LG&E and KU Services

Brent.Ingebrigtsen

Regarding COM-001-2 and proposed definitions, LG&E and KU Services recommends changing the terms being defined from "Interpersonal Communications" and "Alternative Interpersonal Communication" to "Means for Interpersonal Communication" and "Alternative Means for Interpersonal Communication." A communication is an exchange of information, not a medium. The medium is simply the means. LG&E and KU Services Company further recommend that each requirement be rewritten with these new defined terms as appropriate and that the word "capabilities" currently following the defined terms be removed from each of the requirements. We suggest the definition for "Means for Interpersonal Communication" be: "A medium utilizing electromagnetic energy that allows two or more individuals to interact, consult or exchange information." We suggest the definition for "Alternative Means for Interpersonal Communication" be: "Any Means for Interpersonal Communication that is able to serve as a substitute for, and does not utilize the same infrastructure (medium) as, Means for Interpersonal Communications used for day-to-day operation." Regarding R1 through R10, , it is unclear what "shall have Interpersonal Communications capability" means. That could mean that the responsible entity simply has to have an IC capability that is different from our designated AIC capability (as R1 through R8 suggest). That could also mean, differently, that the responsible entity has to designate an IC capability (as R10 suggests). It is also unclear whether the IC capability can change, e.g. from email to land line. There is nothing in the Standard that makes this clear. Regarding R11, as written it is unclear who would be responsible for non-compliance if the consulting entities did not "determine a mutually agreeable action for the restoration of its Interpersonal Communication capability."

Individual

Chris Mattson

Tacoma Power

Yes

Yes

This seems excessive. It should be sufficient to say "each adjacent TOP" regardless of whether they are connected synchronously or via a DC tie.

Yes

R9 – The Standard requires that when there is a failure to a primary or alternate communication system that action is initiated within 2 hours of the communication failure. It is not clear what the term “action” means. Tacoma requests clarification for what “actions” are intended by the standard. R10 – Interpersonal Communication is defined as “any medium that allows two or more individuals to interact, consult, or exchange information”. As it is written, R10 requires an entity to contact another entity “within 60 minutes of the detection of a failure of its Interpersonal Communication capability that lasts 30 minutes or longer”. This contact may not be possible in a situation where there is “a failure of Interpersonal Communication capability”. R11 - The lack of a time line in R11 seems inconsistent with the time line requirements in R9 and R10. If there is a communication failure affecting the GO and DP then the standard only requires that they agree on an action to restore communication but does not assign a timeline.

Group

Colorado Springs Utilities

Jennifer Eckels

No

Adjacent is still an ambiguous term. Does the SDT mean to refer to entities which share an interface/tie-line; entities which have geographically abutting service territories or Areas; entities within the same geographical region but not necessarily “touching”; etc.? Is this the same as or different from “neighboring,” and what is the meaning of that term? Perhaps this term deserves a glossary entry.

No

See previous comment on “adjacent”.

No

See the comment on “evidence” included in the comment section of question 4.

CSU appreciates the work the SDT has put into this standard, along with the others in this project and the opportunity to comment. We agree with the goal to encourage consistent communications and availability of robust & redundant communication paths. CSU appreciates that the SDT appears to have tried to write some flexibility into this standard. As written, however, this draft of COM-001-2 in its entirety seems to us unwieldy and unmanageable. It appears each entity may choose its own ‘primary’ and Alternate “Interpersonal Communication” capabilities. Entity A may select email as its ‘primary’ capability, while Entity B might not select that among either ‘primary’ or “Alternate,” and may not pay any attention on the real-time desk to email (only the designated “Alternate” requires testing). Also, DOs & GOs are not expected to maintain a backup (“Alternate”) communications capability. It is unclear how those entities can then comply with R11 if their one and only interpersonal communication capability has failed. Sufficient evidence includes “physical assets.” Does that mean we can point to the phone on the desk and the email program on the desktop PC and we’re compliant? Are photographs of physical assets sufficient evidence to submit for the pre-audit questionnaire? There is no requirement for the communications capabilities to be either diverse or redundant. If both our capabilities, in the end, rely on the POTS/PSTN system, is that acceptable?

Individual

Patrick Brown

Essential Power, LLC

It is unclear what we are trying to accomplish in R11. If the intent is to coordinate the restoration of communications, then there should be an additional requirement that the GOP have a Communications Recovery Plan, and R11 should focus on the coordination and implementation of that Plan. If the intent is to maintain continuous communications, then there should be an additional requirement for the GOP to maintain an Alternative Interpersonal Communications capability, and R11 should focus on the coordination and implementation of that capability.

Individual

Maggy Powell

Exelon Corporation and its affiliates
The definition of Interpersonal Communication requires further clarification. The use of the term "Any medium" opens the definition up to broad interpretation. It's not clear whether the definition means to apply to the point of communication owned, managed, and operated by the entity, or the total communications pathway? For example if entity A's phone system is working fine, but Entity B is experiencing trouble, does Entity A have a compliance concern if Entity B experiences a communication breakdown on their end of the medium? Please provide greater insight on the intended compliance obligation and consider the following revision to the definition: Interpersonal Communication: Any medium, owned, managed, or operated by the applicable entity, that allows two or more individuals to interact, consult, or exchange information. R9 provides ambiguous instruction for the resolution process surrounding tests and failures of Alternative Interpersonal Communication capability. Please confirm whether the intent of the requirement is to initiate repairs within two hours, or to effect repairs within two hours, with the alternate option being to designate a replacement Alternative Interpersonal Communication if repairs cannot be completed within two hours. R10 has similar ambiguity, referencing a 60 minute notification timeframe requirement upon the detection of a failure lasting 30 minutes or longer. Please confirm the intended start of the requirement notification. Does the clock for notification begins at the point of failure, at the point of discovery, or at the point that the failure is discovered to have been effective for 30 minutes or greater? Thank you for the opportunity to comment.
Individual
Jay Campbell
NV Energy
No
If "Adjacent", a capitalized word, must be in the Definitions section merely because it's capitalized, what about "Each"? Other sentences have capitalized words, such as "If", "Its" and "All". If "Adjacent" is in the Definitions merely because it's capitalized, please also add "If", "Its" and "All".
No
What difference does a synchronous or asynchronous connection make? Do not both have a reliability impact on the two entities on either side? Since there is a reliability impact, regardless of connection type, a separate Requirement is superfluous.
Yes
Individual
Darryl Curtis
Oncor Electric Delivery Company LLC
Yes
Yes
Yes
Oncor takes the position that the premise of R3 does not provide a reliability enhancement but may in effect; increase the risk to reliability by placing notification requirements on the Transmission Operator that could best be managed by the Reliability Coordinator. In fact, Oncor takes the position that as a Transmission Operator, it is being placed into the position of having to continually validate the registration status of every entity that may be registered as a Distribution Provider, Transmission Operator, and Generator Operator within its Transmission Operator Area. Oncor takes the position that since each of these entities are in the applicability section of the standard, the Distribution Provider, Transmission Operator, and Generator Operator should be responsible for seeking

Interpersonal Communication capability with the Transmission Operator and the Transmission Operator should then reciprocate Interpersonal Communication capability in response to their initial request. This eliminates an unnecessary compliance obligation of the Transmission Operator to manage "who is" and "who is not" registered as a Generator Operator, Distribution Provider or Transmission Operator. Oncor recommends the following change to the standard language Remove 3.3 & 3.4 because R7 and R8 already cover the GO and DP seeking Interpersonal Communication capability with the Transmission Operator. Oncor also takes the position that the Reliability Coordinator (RC) is in the best position and not the Transmission Operator to make extensive notifications on a broad basis in the event of a failure of its Interpersonal Communication. In accordance with that position, the Transmission Operator should make a single notification to the RC, and the RC would then make the notification to all impacted entities in the event of the failure of the Transmission Operator's Interpersonal Communication. Oncor proposes the following language for R10 "R10. Each Transmission Operator shall notify the Reliability Coordinator and the Balancing Authority within 60 minutes of the detection of a failure of its Interpersonal Communication capability that lasts 30 minutes or longer. After notification by any Transmission Operator, the Reliability Coordinator shall immediately notify entities as identified in Requirements R1, R3, and R5 of any Transmission Operator's detection of a failure of its Interpersonal Communication capability that lasts 30 minutes or longer Each Reliability Coordinator and Balancing Authority shall notify entities as identified in Requirements R1, R3, and R5 within 60 minutes of the detection of a failure of its own Interpersonal Communication capability that lasts 30 minutes or longer."

Individual

Greg Travis

Idaho Power Company

Yes

Yes

Yes

Individual

Marie Knox

MISO

No

While MISO disagrees with the modifications to COM-001-1 proposed in COM-001-2 generally, it does not disagree with the clarity provided in the proposed addition of "Each" in front of "Adjacent".

No

While MISO disagrees with the modifications to COM-001-1 proposed in COM-001-2 generally, it does not disagree with the proposed removal of "within the same interconnection" .

No

While MISO appreciates the SDT's modifications to Measure M10 since the last draft, the Measure remains ambiguous as to which parties should be contacted when an entity experiences a failure of its Interpersonal Communication capability that lasts 30 minutes or longer. MISO respectfully submits the following changes for Measure 10: "Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall have and provide upon request evidence that it notified the entities as identified in Requirements R1, R3, and R5, as applicable, within 60 minutes of the detection of a failure of its Interpersonal Communication capability that lasted 30 minutes or longer. Evidence could include, but is not limited to dated and time-stamped: test records, operator logs, voice recordings, transcripts of voice recordings, or electronic communications. (R10.)"

MISO respectfully submits that the subject matter of COM-001-1 is better addressed through an official NERC certification – that is, by having NERC certify that a registered entity has the appropriate communications facilities – than through a formal Reliability Standard. Furthermore, the Reliability Standards surrounding communications should be performance based and specifically targeted toward testing, maintenance, and implementation of corrective actions when an issue arises or is

otherwise detected. As a result of narrowing the focus of these standards, enforcement would then be tailored toward a Registered Entity's failure to take such actions when necessary, a direct benefit and correlation to enhancement of the reliability of the BES. Under the currently proposed approach, the lack of a communication medium or a finding that a communication medium is "inadequate" or does not otherwise qualify under the standard would result in a non-compliance. Finally, MISO respectfully submits that: • Distribution Providers (DPs) and Generator Operators (GOPs) should have alternate communication media as well. • If an alternate communication tool is tested once a month, there is no need to address deficiencies within two hours; six hours is sufficient in such instances. • The standard should acknowledge that if more than two independent communication mechanisms are available, the VRF/VSL associated with missing a timing requirement is minimal. The SDT should require reporting times of failed mediums for GOP and DP similar to that for RC/BA/TOP.

Individual

Scott Berry

Indiana Municipal Power Agency

IMPA does not like the wording in R11 that states "mutually agreeable action for the restoration of its Interpersonal Communication capability." IMPA sees that entities will have to prove that the action taken by entities was "mutually agreeable" to the parties involved which will be very problematic. IMP believes as long as the entities who owns the equipment is taking steps to get it back into service that is all that should be required by any requirement of this standard.

Group

ACES Power Marketing Standards Collaborators

Jason Marshall

Yes

Yes

No

We continue to believe that use of "physical assets" instead of "demonstration of physical assets" is problematic. Auditors must be able to take evidence with them and they could not take the physical assets. They could, however, take notes they record from demonstration of the physical assets with them. While we understand that the auditors will understand they can't take the "physical assets", it does not change the fact that the listing "physical assets" as evidence is technically not correct.

(1) The definition of Alternative Interpersonal Communication needs further refinement. As it is written, the primary Interpersonal Communication that is used to satisfy R1, R3, and R5 is also an Alternative Interpersonal Communication. This primary Interpersonal Communication established in R1, R3, and R5 meet all of the requirements of Alternative Interpersonal Communication. It is a Interpersonal Communication and it is capable of replacing the Interpersonal Communication used as the Alternative Interpersonal Communication (which by definition is an Interpersonal Communication) in R2, R4, and R6. Thus, each Interpersonal Communication used in R1, R3, and R5 really are an Interpersonal Communication and Alternative Interpersonal Communication. One solution may be to add a third definition: Primary Interpersonal Communication. It would essentially be an Interpersonal Communication that is designated as primary or the normal communication system. Then Alternative Interpersonal Communication would be defined based on the ability of the Interpersonal Communication to substitute for the Primary. R1, R3, and R5 would need to be changed to refer to the Primary Interpersonal Communication. Another option might be to simply stick with the two existing definitions and use "primary" in R1, R3, and R5. Regardless of the option selected, "another" needs to be added before the second use of Interpersonal Communication for absolute clarity. (2) We appreciate that the drafting team added another VSL for requirements R1 through R8, however, we believe additional levels should be populated. For example, if a Transmission Operator or Balancing Authority failed to have Interpersonal Communications capability with a Distribution Provider but had Interpersonal Communications capability with all other required entities, it has met the vast majority

of the requirement. Since VSLs are a measure of how much the requirement was missed by the responsible entity, a Lower VSL seems most appropriate for failing to have Interpersonal Communication capability with a DP. (3) It seems odd to change the effective date language from what NERC has consistently used throughout the standards. "Following" was replaced with "beyond the date this standard is approved". For consistency with the rest of NERC standards, we recommend changing it back to the original language. (4) We appreciate the changes to R1, R3, R5, R7 and R8 that attempt to clarify that a failure of the primary Interpersonal Communication capability is not a violation of these requirements. However, we believe these requirements will never be approved by the Commission. As they are written, they literally say that R1, R3, R5, R7, and R8 apply when the responsible entity has Interpersonal Communication capability and they don't apply when you don't have the capability but rather other requirements apply. This means R1, R3, R5, R7 and R8 could never be violated which begs the question why are they even needed. Because Commission approval is unlikely for these requirements, we continue to believe the best solution is to focus the requirements on having a communication medium rather than capability. If "capability" were struck from all of the requirements, the requirements would then focus on a communication medium as defined in Interpersonal Communication and Alternative Interpersonal Communication. This solution would still keep the requirements technology neutral since a medium could be any communication system or device and actually provide more flexibility in the requirements. Because the requirements would focus on having a medium in place rather than a capability, failure of the medium would not automatically translate into a violation which means the problematic "unless [responsible entity] experiences a failure of its Interpersonal Communication capability ..." language could be dropped. Dropping this language would improve the likelihood that the Commission would approve the standard. (5) The VRF for R7 should be Medium. Failure for the DP to have Interpersonal Communication with its BA or TOP does not meet the basic requirement of a High VRF. A High VRF requires that violation of the requirement would "directly cause or contribute to bulk electric system instability, separation, or a cascading sequence of failures, or could place the bulk electric system at an unacceptable risk of instability, separation, or cascading failures." We cannot fathom any situation where failure of a BA and TOP being able to communicate would directly lead to or cause instability, separation, or cascading. It could, however, lead to the inability to know the electrical state of part of the transmission system. This fits the Medium VRF definition. Furthermore, the fact that R4 and R6 do not include DP in the list of functional entities for a TOP and BA to have Alternative Interpersonal Communication further supports a Medium VRF. (6) In Measure M11, we believe entity affected should be replaced with its TOP and BA. This makes the measure clearer and easier to read without the need to refer back to the requirement. (7) We disagree with the data retention period. Because voice recordings are mentioned in the measures as one type of evidence for demonstrating compliance to the requirements, the data retention period should not exceed 90 days. Many companies do not store voice recordings longer than this. To compel a responsible entity to store voice recordings for longer should be justified. We do not see this justification. (8) We continue to believe that the DP should not be included in this standard. However, we recognize that the drafting team is attempting to address a FERC directive. An equally efficient and effective alternative would be to leave the responsibility to the BA and TOP. Parts 3.3 and 5.3 require the TOP and BA respectively to have Interpersonal Communication capability with the DP. This will be required whether the standard applies to DP or not based on the Commission directive because the Commission expressed concern about the BA and TOP having communications with the DP during an emergency such as a blackstart event. Because DPs will have to follow directives from the RC, TOP, and BA per IRO-001-3, it is in the best interest of the DP to cooperate with assisting the BA and TOP in establishing this capability. Thus, Parts 3.3 and 5.3 could be relied on exclusively for establishing this Interpersonal Communication Capability without adding unnecessary additional compliance burden on the DP that does not support reliability.

Individual

Kathleen Goodman

ISO New England Inc

No

The ISO-NE continues to believe that these a certification types of requirements and that they do not belong in a standard.

No

The ISO-NE continues to believe that these a certification types of requirements and that they do not

belong in a standard.

The ISO-NE continues to believe that these a certification types of requirements and that they do not belong in a standard. ISO-NE believes that the requirement to have a medium to communicate should be required to be certified. When you are operating as a registered entity, the requirements should be performance based such as taking corrective actions and if you fail to communicate for any reason you will be found non-compliance. The lack of a communication medium should not be a defense for non compliance of the performance based standards. The SDT should require reporting times of failed mediums for GOP and DP similar to that for RC/BA/TOP.

Group

ISO/RTO Standards Review Committee

Gregory Campoli

The IRC continues to believe that these a certification types of requirements and that they do not belong in a standard. The SRC believes that the requirement to have a medium to communicate should be required to be certified. When you are operating as a registered entity, the requirements should be performance based such as taking corrective actions and if you fail to communicate for any reason you will be found non-compliance. The lack of a communication medium should not be a defense for non compliance of the performance based standards. The SDT should require reporting times of failed mediums for GOP and DP similar to that for RC/BA/TOP.