

DRAFT Reliability Standard Audit Worksheet¹

COM-002-4 – Operating Personnel Communications Protocols

This section to be completed by the Compliance Enforcement Authority.

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

Applicability of Requirements

	BA	DP	GO	GOP	IA	LSE	PA	PSE	RC	RP	RSG	TO	TOP	TP	TSP
R1	X								X				X		
R2	X								X				X		
R3		X	X												
R4	X								X				X		
R5	X								X				X		
R6	X	X	X												
R7	X								X				X		

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

The NERC RSAW language contained within this document provides a non-exclusive list, for informational purposes only, of examples of the types of evidence a registered entity may produce or may be asked to produce to demonstrate compliance with the Reliability Standard. A registered entity’s adherence to the examples contained within this RSAW does not necessarily constitute compliance with the applicable Reliability Standard, and NERC and the Regional Entity using this RSAW reserves the right to request additional evidence from the registered entity that is not included in this RSAW. Additionally, this RSAW includes excerpts from FERC Orders and other regulatory references. The FERC Order cites are provided for ease of reference only, and this document does not necessarily include all applicable Order provisions. In the event of a discrepancy between FERC Orders, and the language included in this document, FERC Orders shall prevail.

² Compliance Assessment Date(s): The date(s) the actual compliance assessment (on-site audit, off-site spot check, etc.) occurs.

DRAFT NERC Reliability Standard Audit Worksheet

Subject Matter Experts

Identify Subject Matter Expert(s) responsible for this Reliability Standard. (Insert additional rows if necessary)

Registered Entity Response (Required):

SME Name	Title	Organization	Requirement(s)

DRAFT

R1 Supporting Evidence and Documentation

- R1.** Each Balancing Authority, Reliability Coordinator, and Transmission Operator shall develop documented communications protocols for its operating personnel that issue and receive Operating Instructions. The protocols shall, at a minimum:
- 1.1.** Require its operating personnel that issue and receive an oral or written Operating Instruction to use the English language, unless agreed to otherwise. An alternate language may be used for internal operations.
 - 1.2.** Require its operating personnel that issue an oral two-party, person-to-person Operating Instruction to take one of the following actions:
 - Confirm the receiver’s response if the repeated information is correct.
 - Reissue the Operating Instruction if the repeated information is incorrect or if requested by the receiver.
 - Take an alternative action if a response is not received or if the Operating Instruction was not understood by the receiver.
 - 1.3.** Require its operating personnel that receive an oral two-party, person-to-person Operating Instruction to take one of the following actions:
 - Repeat, not necessarily verbatim, the Operating Instruction and receive confirmation from the issuer that the response was correct.
 - Request that the issuer reissue the Operating Instruction.
 - 1.4.** Require its operating personnel that issue a written or oral single-party to multiple-party burst Operating Instruction to confirm or verify that the Operating Instruction was received by at least one receiver of the Operating Instruction.
 - 1.5.** Specify the instances that require time identification when issuing an oral or written Operating Instruction and the format for that time identification.
 - 1.6.** Specify the nomenclature for Transmission interface Elements and Transmission interface Facilities when issuing an oral or written Operating Instruction.

Definition of Operating Instruction

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

- M1.** Each Balancing Authority, Reliability Coordinator, and Transmission Operator shall provide its documented communications protocols developed for Requirement R1.

Registered Entity Response to General Compliance with this Requirement (Required):

DRAFT NERC Reliability Standard Audit Worksheet

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

Evidence Requested³:

Provide the following evidence, or other evidence to demonstrate compliance. If the provisioning of this evidence is burdensome or otherwise unreasonable, contact your CEA to arrange for sampling or other means of reduction of the quantity of evidence submitted.

A copy of the documented communication protocols that cover the Requirements outlined in Requirement R1 Parts 1.1 to 1.6.

Registered Entity Evidence (Required):

The following information is recommended for all evidence submitted:

File Name, Document Title, Revision, Date, Page(s), Section(s), Section Title(s), and Description.

Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.

Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

Compliance Assessment Approach Specific to COM-002-4, R1

This section to be completed by the Compliance Enforcement Authority

	Review the documented communications protocols provided by entity and ensure they address the Parts of R1 as follows:
(1.1)	Requires its operating personnel that issue and receive an oral or written Operating Instruction to use the English language, unless agreed to otherwise. An alternate language may be used for internal operations.
(1.2)	Requires its operating personnel that issue an oral two-part, person-to-person Operating Instruction to take one of the following actions: confirm the receiver's response if the repeated information is correct, reissue the Operating Instruction if the repeated information is incorrect or if requested by the receiver, or take an alternative action to issue a new or the same Operating Instruction if the receiver does not respond.
(1.3)	Requires its operating personnel that receive an oral two-party, person-to-person Operating Instruction to take one of the following actions: repeat, not necessarily verbatim, the Operating

³ Items in the Evidence Requested section are suggested evidence that may, but will not necessarily, demonstrate compliance. These items are not mandatory and other forms and types of evidence may be submitted at the entity's discretion.

DRAFT NERC Reliability Standard Audit Worksheet

	Instruction and receive confirmation from the issuer that the response was correct, or request that the issuer reissue the Operating Instruction.
(1.4)	Requires its operating personnel that issue a written or oral single-party to multiple-party burst Operating Instruction to confirm or verify that the Operating Instruction was received by at least one receiver of the Operating Instruction.
(1.5)	Specifies the instances that require time identification when issuing an oral or written Operating Instruction and the format for that time identification.
(1.6)	Specifies the nomenclature for Transmission interface Elements and Transmission interface Facilities when issuing an oral or written Operating Instruction.

Note to Auditor:

Auditor Notes:

R2 Supporting Evidence and Documentation

- R2.** Each Balancing Authority, Reliability Coordinator, and Transmission Operator shall conduct initial training for each of its operating personnel responsible for the Real-time operation of the interconnected Bulk Electric System on the documented communications protocols developed in Requirement R1 prior to that individual operator issuing an Operating Instruction.
- M2.** Each Balancing Authority, Reliability Coordinator, and Transmission Operator shall provide training records related to its documented communications protocols developed for Requirement R1 such as attendance logs, agendas, learning objectives, or course materials in fulfillment of Requirement R2.

Registered Entity Response to General Compliance with this Requirement (Required):

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

Evidence Requested⁴:

Provide the following evidence, or other evidence to demonstrate compliance. If the provisioning of this evidence is burdensome or otherwise unreasonable, contact your CEA to arrange for sampling or other means of reduction of the quantity of evidence submitted.

Copies of dated attendance logs, agendas, learning objectives, or course materials as outlined in M2.

Organization chart or similar artifact identifying the operating personnel responsible for the Real-time operation of the interconnected Bulk Electric System and the date such personnel began operating the Real-time Bulk Electric System.

Registered Entity Evidence (Required):

The following information is recommended for all evidence submitted:
File Name, Document Title, Revision, Date, Page(s), Section(s), Section Title(s), and Description.
Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.

Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

⁴ Items in the Evidence Requested section are suggested evidence that may, but will not necessarily, demonstrate compliance. These items are not mandatory and other forms and types of evidence may be submitted at the entity's discretion.

DRAFT NERC Reliability Standard Audit Worksheet

Compliance Assessment Approach Specific to COM-002-4, R2

This section to be completed by the Compliance Enforcement Authority

Verify applicable operating personnel, or a sample thereof, received the required training prior to the date they began operating the Real-time Bulk Electric System by agreeing selected personnel names to training records.

Note to Auditor: Requirement R2 requires only initial training; continuing training is not required.

Auditor Notes:

--

DRAFT

R3 Supporting Evidence and Documentation

- R3.** Each Distribution Provider and Generator Operator shall conduct initial training for each of its operating personnel who can receive an oral two-party, person-to-person Operating Instruction prior to that individual operator receiving an oral two-party, person-to-person Operating Instruction to either:
- Repeat, not necessarily verbatim, the Operating Instruction and receive confirmation from the issuer that the response was correct, or
 - Request that the issuer reissue the Operating Instruction.
- M3.** Each Distribution Provider and Generator Operator shall provide its initial training records for its operating personnel such as attendance logs, agendas, learning objectives, or course materials in fulfillment of Requirement R3.

Registered Entity Response to General Compliance with this Requirement (Required):

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

Evidence Requested⁵:

Provide the following evidence, or other evidence to demonstrate compliance. If the provisioning of this evidence is burdensome or otherwise unreasonable, contact your CEA to arrange for sampling or other means of reduction of the quantity of evidence submitted.

Copies of dated attendance logs, agendas, learning objectives, or course materials as outlined in M3.

Organization chart or similar artifact identifying the operating personnel who can receive an oral two-party, person-to-person Operating Instruction and the date such personnel began receiving such instructions.

Registered Entity Evidence (Required):

The following information is recommended for all evidence submitted:

File Name, Document Title, Revision, Date, Page(s), Section(s), Section Title(s), and Description.

Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.

Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

⁵ Items in the Evidence Requested section are suggested evidence that may, but will not necessarily, demonstrate compliance. These items are not mandatory and other forms and types of evidence may be submitted at the entity's discretion.

DRAFT NERC Reliability Standard Audit Worksheet

Compliance Assessment Approach Specific to COM-002-4, R3

This section to be completed by the Compliance Enforcement Authority

Verify applicable operating personnel, or a sample thereof, received the required training prior to the date they began receiving oral two-party, person-to-person Operating Instructions by agreeing selected personnel names to training records.

Note to Auditor: Requirement R3 requires only initial training; continuing training is not required.

Auditor Notes:

--

DRAFT

R4 Supporting Evidence and Documentation

- R4.** Each Balancing Authority, Reliability Coordinator, and Transmission Operator shall, at least once every twelve (12) calendar months:
 - 4.1.** Assess adherence to the documented communications protocols in Requirement R1 by its operating personnel that issue and receive Operating Instructions, provide feedback to those operating personnel and take corrective action as appropriate to address deviations from the documented protocols.
 - 4.2.** Assess the effectiveness of its documented communications protocols in Requirement R1 for its operating personnel that issue and receive Operating Instructions and modify its documented communication protocols, as necessary.

- M4.** Each Balancing Authority, Reliability Coordinator, and Transmission Operator shall provide evidence of its assessments, including spreadsheets, logs or other evidence of feedback, findings of effectiveness and any changes made to its documented communications protocols developed for Requirement R1 in fulfillment of Requirement R4. The entity shall provide evidence that it took appropriate corrective actions as part of its assessment or all instances where an operating personnel’s non-adherence to the protocols developed in Requirement R1 is the sole or partial cause of an Emergency, and for all other instances where the entity determined that it was appropriate to take a corrective action to address deviations from the documented protocols developed in Requirement R1.

Definition of Emergency

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.

Registered Entity Response to General Compliance with this Requirement (Required):

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

Evidence Requested⁶:

Provide the following evidence, or other evidence to demonstrate compliance. If the provisioning of this evidence is burdensome or otherwise unreasonable, contact your CEA to arrange for sampling or other means of reduction of the quantity of evidence submitted.

- (4.1) Dated spreadsheets, logs, or other evidence of assessment and feedback of operating personnel as outlined in M4.

⁶ Items in the Evidence Requested section are suggested evidence that may, but will not necessarily, demonstrate compliance. These items are not mandatory and other forms and types of evidence may be submitted at the entity’s discretion.

DRAFT NERC Reliability Standard Audit Worksheet

(4.2) Revisions made to documented communications protocols based on assessments, or minutes of meetings or others summaries evidencing the effectiveness of documented protocols were assessed.

A list or log of corrective actions taken in response to Emergencies occurring on the entity's system due to non-adherence to documented communications protocols during the audit period.

Registered Entity Evidence (Required):

The following information is recommended for all evidence submitted:

File Name, Document Title, Revision, Date, Page(s), Section(s), Section Title(s), and Description.

Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.

Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

Compliance Assessment Approach Specific to COM-002-4, R4

This section to be completed by the Compliance Enforcement Authority

(4.1) Review evidence to gain reasonable assurance that an assessment of operating personnel issuing and receiving Operating Instructions adherence to the documented protocols established in Requirement R1 occurred every twelve months during the audit period. Verify assessment or another artifact includes evidence such as annotations or summaries of providing feedback and taking corrective action, as necessary, in accordance with the requirement.

(4.2) Review evidence such as document revisions, meetings minutes, or other summaries to gain reasonable assurance that the effectiveness of documented communications protocols in Requirement R1 was assessed every twelve months during the audit period.

For Emergencies, occurring on the entity's system, or a sample thereof, assess whether or not an operating personnel's non-adherence to the documented protocols was the partial or sole cause of the Emergency and if so, verify entity took appropriate corrective actions by reviewing summaries, meeting minutes, or the like, outlining corrective actions taken.

Note to Auditor: Auditors can use their general knowledge of the entity's system, discussions with other Regional Entity/NERC personnel, and discussions with entity personnel to gain an awareness of Emergencies resulting potentially from non-adherence to communications protocols. Such Emergency events can then be reviewed during an audit to determine, if the Emergency was indeed attributable to an instance of non-adherence to communications protocols, that corrective action was taken.

The extent of audit procedures applied related to this requirement will vary depending on certain risk factors to the Bulk Electric System. In general, more extensive audit procedures will be applied where risks to the Bulk Electric System are determined by the auditor to be higher for non-compliance with this requirement.

DRAFT NERC Reliability Standard Audit Worksheet

Based on the auditor's assessment of risk, as described above, specific audit procedures applied for this requirement may range from exclusion of this requirement from audit scope to the auditor reviewing, in accordance with the above Compliance Assessment Approach, evidence associated with the entity's responses to numerous Emergencies.

Auditor Notes:

DRAFT

R5 Supporting Evidence and Documentation

- R5.** Each Balancing Authority, Reliability Coordinator, and Transmission Operator that issues an oral two-party, person-to-person Operating Instruction during an Emergency, excluding written or oral single-party to multiple-party burst Operating Instructions, shall either:
- Confirm the receiver’s response if the repeated information is correct (in accordance with Requirement R6).
 - Reissue the Operating Instruction if the repeated information is incorrect or if requested by the receiver.
 - Take an alternative action if a response is not received or if the Operating Instruction was not understood by the receiver.
- M5.** Each Reliability Coordinator, Transmission Operator, and Balancing Authority that issued an oral two-party, person-to-person Operating Instruction during an Emergency, excluding oral single-party to multiple-party burst Operating Instructions, shall have evidence that the issuer either: 1) confirmed that the response from the recipient of the Operating Instruction was correct; 2) reissued the Operating Instruction if the repeated information was incorrect or if requested by the receiver; or 3) took an alternative action if a response was not received or if the Operating Instruction was not understood by the receiver. Such evidence could include, but is not limited to, dated and time-stamped voice recordings, or dated and time-stamped transcripts of voice recordings, or dated operator logs in fulfillment of Requirement R5.

Registered Entity Response to General Compliance with this Requirement (Required):

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

Evidence Requested⁷:

Provide the following evidence, or other evidence to demonstrate compliance. If the provisioning of this evidence is burdensome or otherwise unreasonable, contact your CEA to arrange for sampling or other means of reduction of the quantity of evidence submitted.

Dated and time-stamped voice recordings or transcripts of such voice recordings or operator logs, as described in M5.

Registered Entity Evidence (Required):

The following information is recommended for all evidence submitted:

File Name, Document Title, Revision, Date, Page(s), Section(s), Section Title(s), and Description.

⁷ Items in the Evidence Requested section are suggested evidence that may, but will not necessarily, demonstrate compliance. These items are not mandatory and other forms and types of evidence may be submitted at the entity’s discretion.

DRAFT NERC Reliability Standard Audit Worksheet

Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.

Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

Compliance Assessment Approach Specific to COM-002-4, R5

This section to be completed by the Compliance Enforcement Authority

Review evidence and determine for Operating Instructions issued during an Emergency the entity confirmed the receiver's response if the repeated information was correct (in accordance with Requirement R6), reissued the Operating Instruction if the repeated information was not correct or if requested by the receiver, and took alternative action to issue a new or the same Operating Instruction if the receiver did not respond.

Note to Auditor: Auditors can use their general knowledge of the entity's system, discussions with other Regional Entity/NERC personnel, and discussions with entity personnel to gain an awareness of Emergencies resulting potentially from non-adherence to Requirement R5. Such Emergency events can then be reviewed during an audit to determine if the evidence indicates the entity complied with Requirement R5 in issuing Operating Instructions during the Emergency.

The extent of audit procedures applied related to this requirement will vary depending on certain risk factors to the Bulk Electric System. In general, more extensive audit procedures will be applied where risks to the Bulk Electric System are determined by the auditor to be higher for non-compliance with this requirement.

Based on the auditor's assessment of risk, as described above, specific audit procedures applied for this requirement may range from exclusion of this requirement from audit scope to the auditor reviewing, in accordance with the above Compliance Assessment Approach, evidence associated with the entity's responses to numerous Operating Instructions issued during Emergencies.

Auditor Notes:

--

R6 Supporting Evidence and Documentation

- R6.** Each Balancing Authority, Distribution Provider, Generator Operator, and Transmission Operator that receives an oral two-party, person-to-person Operating Instruction during an Emergency, excluding written or oral single-party to multiple-party burst Operating Instructions, shall either:
- Repeat, not necessarily verbatim, the Operating Instruction and receive confirmation from the issuer that the response was correct, or
 - Request that the issuer reissue the Operating Instruction.
- M6.** Each Balancing Authority, Distribution Provider, Generator Operator, and Transmission Operator that was the recipient of an oral two-party, person-to-person Operating Instruction during an Emergency, excluding oral single-party to multiple-party burst Operating Instructions, shall have evidence to show that the recipient either repeated, not necessarily verbatim, the Operating Instruction and received confirmation from the issuer that the response was correct, or requested that the issuer reissue the Operating Instruction in fulfillment of Requirement R6. Such evidence may include, but is not limited to, dated and time-stamped voice recordings, dated operator logs, an attestation from the issuer of the Operating Instruction, voice recordings (if the entity has such recordings), memos or transcripts.

Registered Entity Response to General Compliance with this Requirement (Required):

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

Evidence Requested⁸:

Provide the following evidence, or other evidence to demonstrate compliance. If the provisioning of this evidence is burdensome or otherwise unreasonable, contact your CEA to arrange for sampling or other means of reduction of the quantity of evidence submitted.

Dated operator logs, voice recordings, memos, or transcripts, or other evidence (per M6) describing the entity's response to Operating Instructions received during an Emergency selected by the auditor.

Registered Entity Evidence (Required):

The following information is recommended for all evidence submitted:
File Name, Document Title, Revision, Date, Page(s), Section(s), Section Title(s), and Description.
Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.

⁸ Items in the Evidence Requested section are suggested evidence that may, but will not necessarily, demonstrate compliance. These items are not mandatory and other forms and types of evidence may be submitted at the entity's discretion.

DRAFT NERC Reliability Standard Audit Worksheet

Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

Compliance Assessment Approach Specific to COM-002-4, R6

This section to be completed by the Compliance Enforcement Authority

	Review evidence and determine for Operating Instructions received during an Emergency entity repeated, not necessarily verbatim, the Operating Instruction and received confirmation from the issuer that the response was correct, or requested that the issuer reissue the Operating Instruction.
<p>Note to Auditor: Auditors can use their general knowledge of the entity’s system, discussions with other Regional Entity/NERC personnel, and discussions with entity personnel to gain an awareness of Emergencies resulting potentially from non-adherence to Requirement R6. Such Emergency events can then be reviewed during an audit to determine if the evidence indicates the entity complied with Requirement R6 for Operating Instructions received during the Emergency.</p> <p>The extent of audit procedures applied related to this requirement will vary depending on certain risk factors to the Bulk Electric System. In general, more extensive audit procedures will be applied where risks to the Bulk Electric System are determined by the auditor to be higher for non-compliance with this requirement.</p> <p>Based on the auditor’s assessment of risk, as described above, specific audit procedures applied for this requirement may range from exclusion of this requirement from audit scope to the auditor reviewing, in accordance with the above Compliance Assessment Approach, evidence associated with the entity’s responses to numerous Operating Instructions received during Emergencies.</p>	

Auditor Notes:

--

R7 Supporting Evidence and Documentation

- R7.** Each Balancing Authority, Reliability Coordinator, and Transmission Operator that issues a written or oral single-party to multiple-party burst Operating Instruction during an Emergency shall confirm or verify that the Operating Instruction was received by at least one receiver of the Operating Instruction.
- M7.** Each Balancing Authority, Reliability Coordinator and Transmission Operator that issued a written or oral single or multiple-party burst Operating Instruction during an Emergency shall provide evidence that the Operating Instruction was received by at least one receiver. Such evidence may include, but is not limited to, dated and time-stamped voice recordings, dated operator logs, electronic records, voice recordings (if the entity has such recordings), memos or transcripts.

Registered Entity Response to General Compliance with this Requirement (Required):

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

Evidence Requested⁹:

Provide the following evidence, or other evidence to demonstrate compliance. If the provisioning of this evidence is burdensome or otherwise unreasonable, contact your CEA to arrange for sampling or other means of reduction of the quantity of evidence submitted.

Dated operator logs, voice recordings, memos, or transcripts, as described in M5 and for Emergencies requested by the auditor.

Registered Entity Evidence (Required):

The following information is recommended for all evidence submitted:
File Name, Document Title, Revision, Date, Page(s), Section(s), Section Title(s), and Description.
Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.

Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

⁹ Items in the Evidence Requested section are suggested evidence that may, but will not necessarily, demonstrate compliance. These items are not mandatory and other forms and types of evidence may be submitted at the entity's discretion.

Compliance Assessment Approach Specific to COM-002-4, R7

This section to be completed by the Compliance Enforcement Authority

Review evidence and determine entity confirmed or verified that the multiple-party burst Operating Instruction was received by at least one receiver of the Operating Instruction.
--

Note to Auditor: Auditors can use their general knowledge of the entity’s system, discussions with other Regional Entity/NERC personnel, and discussions with entity personnel to gain an awareness of Emergencies resulting potentially from non-adherence to Requirement R7. Such Emergency events can then be reviewed during an audit to determine if the evidence indicates the entity complied with Requirement R7 when issuing written or oral burst Operating Instructions during the Emergency.

The extent of audit procedures applied related to this requirement will vary depending on certain risk factors to the Bulk Electric System. In general, more extensive audit procedures will be applied where risks to the Bulk Electric System are determined by the auditor to be higher for non-compliance with this requirement.

Based on the auditor’s assessment of risk, as described above, specific audit procedures applied for this requirement may range from exclusion of this requirement from audit scope to the auditor reviewing evidence, in accordance with the above Compliance Assessment Approach, associated with the entity’s responses to numerous burst Operating Instructions issued during Emergencies.

Auditor Notes:

--

Revision History

Version	Date	Reviewers	Revision Description
1	10/2013	NERC Compliance, Standards	New Document
2	1/2/2014	NERC Compliance, Standards	Revised to reflect revisions to Reliability Standard language

DRAFT