Comment Form — 1st Draft of SAR for Operating Personnel Communications Protocols

Please use this form to submit comments on the proposed SAR for Operating Personnel Communications Protocols. Comments must be submitted by **April 17, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.net with the abbreviation "Protocols" in the subject line. If you have questions please contact **Harry Tom** at Harry.Tom@nerc.net or by telephone at 609-452-8060.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
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NERC Region		**Registered Ballot Body Segment**
☐ **ERCOT** ☐ **FRCC** ☐ **MRO** ☐ **NPCC** ☒ **RFC** ☐ **SERC** ☐ **SPP** ☐ **WECC** ☐ **NA – Not Applicable**	☐	1 — Transmission Owners
	☐	2 — RTOs, ISOs
	☒	3 — Load-serving Entities
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	☒	5 — Electric Generators
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	☐	9 — Federal, State, Provincial Regulatory or other Government Entities
	☐	10 - Regional Reliability Organizations and Regional Entities

Group Comments (Complete this page if comments are from a group.)

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Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

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Additional Member Name	Additional Member Organization	Region*	Segment*

*If more than one region or segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

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This SAR proposes developing a set of standardized communication protocols for system operators to use during normal and emergency operations to improve situational awareness and shorten response time.

The requirements for communications protocols may be developed and then distributed to relevant standards and/or may be developed and retained in one or more specialized standards.

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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. **Do you believe that there is a reliability-related need to establish a set of communications protocols to improve situational awareness and shorten response time?**

   ☒ Yes

   ☐ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments:

2. **Do you agree with the scope of the proposed standard?**

   ☐ Yes

   ☒ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments: The scope should be limited to communications between entities and should not prescribe communication protocols for communication within an organization. Intra-company communications are most appropriately addressed by interal policies and procedures tailored to an entity's specific needs and characteristics.

3. **The proposed standard will be applicable to Transmission Operators, Balancing Authorities, Reliability Coordinators, Generator Operators and Distribution Providers. Do you agree with the proposed applicability?**

   ☐ Yes

   ☒ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments: Scope should be limited to communication among separate entities/organizations. For example, the standard should not address communication protocols between a Balancing Authority, Generaotr Operator and a Distribution Provider tha are the same corporate entity. The requirement to maintain situational awareness within a given entiy is addressed by other standards.

4. **The SAR includes a list of standards that include requirements that involve the issuing or receipt of real-time communications. If you are aware of additional requirements, beyond those listed on pages 8-9, please identify them here.**

   ☐ The following list of requirements involves the issuing or receipt of real-time communications:

   Comments:

5. **Please provide any other comments (that you have not already provided in response to the first four questions on this form) that you have on the revised SAR.**
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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
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NERC Region		**Registered Ballot Body Segment**
☐ **ERCOT**	☒	1 — Transmission Owners
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   ☒ Yes

   ☐ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments:

2. **Do you agree with the scope of the proposed standard?**

   ☐ Yes

   ☒ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments: There is no doubt that during alerts and emergencies, both parties in communication require a common defintion. To the extent the standard requires neighboring BAs, TOs and RCs to use the same word with the same meaning, then the scope of the proposed standard makes sense. However, as written the standard appears to indicate the kind of scripting that is better suited to selling magazines from a boiler room. No defined protocol can match every situation. And if in fact that was even a goal, the operators would have the time-consumign task of identifying which script currently was needed when their time would be better spent resolving the situation.

   The SAR also proposes that any reliability impacts beyond a Reliability Coordinator's area must be coordinated and approved by the impacted Reliability Coordinator. Clearly, if time permits, this coordination is appropriate. However, in an emergency, the RC nay have to use independent judgement.

3. **The proposed standard will be applicable to Transmission Operators, Balancing Authorities, Reliability Coordinators, Generator Operators and Distribution Providers. Do you agree with the proposed applicability?**

   ☒ Yes

   ☐ No

   If "No," please explain why in the comment area below and provide supporting information.
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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	Jason Shaver	
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NERC Region		**Registered Ballot Body Segment**
☐ **ERCOT**	☒	1 — Transmission Owners
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1. **Do you believe that there is a reliability-related need to establish a set of communications protocols to improve situational awareness and shorten response time?**

   ☒ Yes

   ☐ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments: The SAR needs further clarification before it is moved into the next stage. The SAR should identify at a minimum the words and procedures that the SDT is going to consider for a reliability standard.

2. **Do you agree with the scope of the proposed standard?**

   ☐ Yes

   ☒ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments: The SAR should be expanded to include local control center's system operators.

   See our comments to question 3.

   The SAR should specify how each of the identified standards will be addressed through this process.

3. **The proposed standard will be applicable to Transmission Operators, Balancing Authorities, Reliability Coordinators, Generator Operators and Distribution Providers. Do you agree with the proposed applicability?**

   ☐ Yes

   ☒ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments: Issue 1:

   The recommendation from the blackout report is overly broad and vague. Tightening does not sound like a complete overhaul but rather tweaking the existing protocols and documenting them if they are informal. This may not even require a standard across all functional entities. TOPs and BAs in a given region have long history of communication and differing terms are already understood. However, for communications that occur between regional areas, there may be a need for common terms.

   ATC does not agree with the concept of a rigorous script for communications. This may sound like it would require the team to identify any operational situation that could ever occur and then establish a script. If this were possible, it would be great. However, it is not possible. This is why we have trained operators to make decisions when new operational situations occur.

   Issue 2:

The SAR needs to include local control center's system operators. The inclusion of this group of system operators will not be simple because local control centers are not an identified entity in NERC's functional model. Never the less if the SDT is going to create a common lexicon and procedures it's important that these system operators are required to follow the standard. ATC believes that the purpose behind this SAR would be better address through NERC's CEH program then through reliability standards.

SAR Scope:

"The scope of the proposed standard or reviewed standards is to establish a common lexicon of communications protocols and communications paths such that all operators and users of the North American bulk electric system have the same understanding as to its meaning, usage and take pre-determined action in response."

PER FERC Final Rule RM06-

"1343. Clearly, in a region where an RTO or ISO performs the transmission operator function, its personnel with primary responsibility for real-time operations must receive formal training pursuant to PER-002-0. IN addition, personnel who are responsible for implementing instructions at a local control center also affect the reliability of the Bulk Power System. These entities may take independent action under certain circumstances, for example, to protect assets, personnel safety and during system restorations. Whether the RTO or the local control center is ultimately responsible for compliance is a separate issue addressed above, but regardless of which entity registers for that responsibility, these local control center employees must receive formal training consistent with their roles, responsibilities and tasks. Thus, while we direct the ERO to develop modifications to PER-002-0 to include formal training for local control center personnel, that training should be tailored to the needs of the positions."

"1345. Another organization structure, typically representative of relative smaller entities, consists of a single control center that implements operating instructions from its transmission operator, e.g., an RTO, ISO or pooled resources. Similar to the discussion above, operators at these control centers also may take independent action to protect assets, safety and system restoration. Such control center personnel must also receive formal training pursuant to PER-002-0."

Because NERC has been order to create training plans for local control center's system operator any common lexicon and communications protocols could be dealt with for all entities most effectively in NERC's CEH program.

4. The SAR includes a list of standards that include requirements that involve the issuing or receipt of real-time communications. If you are aware of additional requirements, beyond those listed on pages 8-9, please identify them here.

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Comments:

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
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NERC Region		**Registered Ballot Body Segment**
☐ **ERCOT** ☐ **FRCC** ☐ **MRO** ☐ **NPCC** ☐ **RFC** ☐ **SERC** ☐ **SPP** ☒ **WECC** ☐ **NA – Not Applicable**	☒	1 — Transmission Owners
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   ☒ Yes

   ☐ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments:

2. **Do you agree with the scope of the proposed standard?**

   ☒ Yes

   ☐ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments:

3. **The proposed standard will be applicable to Transmission Operators, Balancing Authorities, Reliability Coordinators, Generator Operators and Distribution Providers. Do you agree with the proposed applicability?**

   ☒ Yes

   ☐ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments:

4. **The SAR includes a list of standards that include requirements that involve the issuing or receipt of real-time communications. If you are aware of additional requirements, beyond those listed on pages 8-9, please identify them here.**

   ☐ The following list of requirements involves the issuing or receipt of real-time communications:

   Comments: Non identified

5. **Please provide any other comments (that you have not already provided in response to the first four questions on this form) that you have on the revised SAR.**
   Comments: No additional comments

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	CJ Ingersoll	
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NERC Region		**Registered Ballot Body Segment**
☐ **ERCOT** ☐ **FRCC** ☐ **MRO** ☐ **NPCC** ☐ **RFC** ☐ **SERC** ☐ **SPP** ☐ **WECC** ☐ **NA – Not Applicable**	☐	1 — Transmission Owners
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1. **Do you believe that there is a reliability-related need to establish a set of communications protocols to improve situational awareness and shorten response time?**

   ☒ Yes

   ☐ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments: CECD believes there is a reliability reason for establishing a set of communication protocols.

2. **Do you agree with the scope of the proposed standard?**

   ☒ Yes

   ☐ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments: CECD agrees with the scope, however, CECD would caution that pre-defined action in response to grid operations would need to be broad enough to allow the flexibility that is required by a diverse system. The statement that raises this concern in the Scope is the first sentence which states, the scope of the proposed standard or revised standards is to establish a common lexicon of communications protocols and communication paths such that all operators and users of the North American bulk electric system have the same understanding as to its meaning, usage and take pre-determined action in response. The standard should focus on the communication paths, per-determined contacts (regular communication/testing), the applicable langage and the terminology but not necessarily a specific action.

3. **The proposed standard will be applicable to Transmission Operators, Balancing Authorities, Reliability Coordinators, Generator Operators and Distribution Providers. Do you agree with the proposed applicability?**

   ☒ Yes

   ☐ No

   If "No," please explain why in the comment area below and provide supporting information.
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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	Ed Davis	
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E-mail:	edavis@entergy.com	
NERC Region		**Registered Ballot Body Segment**
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   Comments:

We have the following suggestions concerning this SAR:

1. The use of the phrase “communications protocols” is not the best choice of labels for the purposes at hand because of the widespread and multi-faceted use of this phrase in the field of data communications. As an alternative we would recommend using the term "communication procedures".

2. The scope of this standard should be constrained to inter-operator human communications vocabulary solely about the bulk electric system. A different SAR should be written for cyber communication standards.

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	Colleen Frosch	
Organization:	ERCOT	
Telephone:	512-248-4219	
E-mail:	cfrosch@ercot.com	
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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. **Do you believe that there is a reliability-related need to establish a set of communications protocols to improve situational awareness and shorten response time?**

   ☒ Yes

   ☐ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments:

2. **Do you agree with the scope of the proposed standard?**

   ☐ Yes

   ☒ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments: There may be a need for pre-defined terms, however we do not agree with the concept of a rigorous script for communications. It would not be possible to identify every operational situation.

3. **The proposed standard will be applicable to Transmission Operators, Balancing Authorities, Reliability Coordinators, Generator Operators and Distribution Providers. Do you agree with the proposed applicability?**

   ☒ Yes

   ☐ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments:

4. **The SAR includes a list of standards that include requirements that involve the issuing or receipt of real-time communications. If you are aware of additional requirements, beyond those listed on pages 8-9, please identify them here.**

   ☐ The following list of requirements involves the issuing or receipt of real-time communications:

   Comments:

5. **Please provide any other comments (that you have not already provided in response to the first four questions on this form) that you have on the revised SAR.**
   Comments:

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	David L. Folk	
Organization:	FirstEnergy Corp.	
Telephone:	330-384-4668	
E-mail:	folkd@firstenergycorp.com	
NERC Region		**Registered Ballot Body Segment**
☐ **ERCOT** ☐ **FRCC** ☐ **MRO** ☐ **NPCC** ☒ **RFC** ☐ **SERC** ☐ **SPP** ☐ **WECC** ☐ **NA – Not Applicable**	☒	1 — Transmission Owners
	☐	2 — RTOs, ISOs
	☒	3 — Load-serving Entities
	☐	4 — Transmission-dependent Utilities
	☒	5 — Electric Generators
	☒	6 — Electricity Brokers, Aggregators, and Marketers
	☐	7 — Large Electricity End Users
	☐	8 — Small Electricity End Users
	☐	9 — Federal, State, Provincial Regulatory or other Government Entities
	☐	10 - Regional Reliability Organizations and Regional Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region*	Segment*

*If more than one region or segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

Background Information

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1. **Do you believe that there is a reliability-related need to establish a set of communications protocols to improve situational awareness and shorten response time?**

   ☒ Yes

   ☐ No

   If "No," please explain why in the comment area below and provide supporting information.

   Comments:

2. **Do you agree with the scope of the proposed standard?**

   ☒ Yes

   ☐ No

   If "No," please explain why in the comment area below and provide supporting information.

   Comments:

3. **The proposed standard will be applicable to Transmission Operators, Balancing Authorities, Reliability Coordinators, Generator Operators and Distribution Providers. Do you agree with the proposed applicability?**

   ☒ Yes

   ☐ No

   If "No," please explain why in the comment area below and provide supporting information.

   Comments:

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   ☐ The following list of requirements involves the issuing or receipt of real-time communications:

   Comments:

5. **Please provide any other comments (that you have not already provided in response to the first four questions on this form) that you have on the revised SAR.**

   Comments: No additional comments

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
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Organization:	Hydro-Québec TransÉnergie (HQT)	
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NERC Region		**Registered Ballot Body Segment**
☐ **ERCOT**	☒	1 — Transmission Owners
☐ **FRCC**	☐	2 — RTOs, ISOs
☐ **MRO**	☐	3 — Load-serving Entities
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Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region*	Segment*

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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. **Do you believe that there is a reliability-related need to establish a set of communications protocols to improve situational awareness and shorten response time?**

   ☒ Yes

   ☒ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments: HQT supports establishing communication protocols to define consistent emergency determinations. However, the standard should not extend to establishing pre-defined scripts that operators must follow in their communications without the element of judgement and discussion that are needed in such situations.

2. **Do you agree with the scope of the proposed standard?**

   ☒ Yes

   ☒ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments: See response Question #1.

3. **The proposed standard will be applicable to Transmission Operators, Balancing Authorities, Reliability Coordinators, Generator Operators and Distribution Providers. Do you agree with the proposed applicability?**

   ☒ Yes

   ☐ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments:

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   ☐ The following list of requirements involves the issuing or receipt of real-time communications:

   Comments: No others.

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   Comments:

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	Ron Falsetti	
Organization:	IESO	
Telephone:	905-855-6187	
E-mail:	ron.falsetti@ieso.ca	
NERC Region		**Registered Ballot Body Segment**
☐ **ERCOT** ☐ **FRCC** ☐ **MRO** ☒ **NPCC** ☐ **RFC** ☐ **SERC** ☐ **SPP** ☐ **WECC** ☐ **NA – Not Applicable**	☐	1 — Transmission Owners
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	☐	10 - Regional Reliability Organizations and Regional Entities

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Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region*	Segment*

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1. **Do you believe that there is a reliability-related need to establish a set of communications protocols to improve situational awareness and shorten response time?**

   ☒ Yes

   ☐ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments:

2. **Do you agree with the scope of the proposed standard?**

   ☒ Yes

   ☒ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments: The scope of the SAR is too broad and too prescriptive. The Applicability section of the SAR where it states "... the protocol shall define a rigorous script for the Sender and Receiver of information…" is too prescriptive yet not exhaustive enough to cover all situations. We support the notion of defining standard terms to be used in operation personnel communication, but do not believe predetermined script is required in every communication situation, nor do we think it is possible to have a set of scripts that covers all possible cases.

3. **The proposed standard will be applicable to Transmission Operators, Balancing Authorities, Reliability Coordinators, Generator Operators and Distribution Providers. Do you agree with the proposed applicability?**

   ☒ Yes

   ☐ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments:

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   Comments:

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Comments:

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region		**Registered Ballot Body Segment**
☐ **ERCOT** ☐ **FRCC** ☐ **MRO** ☐ **NPCC** ☐ **RFC** ☐ **SERC** ☐ **SPP** ☐ **WECC** ☐ **NA – Not Applicable**	☐	1 — Transmission Owners
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	☐	8 — Small Electricity End Users
	☐	9 — Federal, State, Provincial Regulatory or other Government Entities
	☐	10 - Regional Reliability Organizations and Regional Entities

Group Comments (Complete this page if comments are from a group.)

Group Name: SRC Standards Review Committee

Lead Contact: **Charles Yeung**

Contact Organization: **SPP**

Contact Segment: **2**

Contact Telephone: **832-724-6142**

Contact E-mail: **cyeung@spp.org**

Additional Member Name	Additional Member Organization	Region*	Segment*
Mike Calimano	NYISO	NPCC	2
Alicia Daugherty	PJM	RFC	2
Ron Falsetti	IESO	NPCC	2
Matt Goldberg	ISO-NE	NPCC	2
Brent Kingsford	CAISO	WECC	2
Steve Myers	ERCOT	ERCOT	2
William Phillips	MISO	RFC+SERC+MRO	2
Anita Lee	AESO	WECC	2

*If more than one region or segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

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Comment Form — 1st Draft of SAR for Operating Personnel Communications Protocols

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1. **Do you believe that there is a reliability-related need to establish a set of communications protocols to improve situational awareness and shorten response time?**

   ☒ Yes

   ☐ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments:

2. **Do you agree with the scope of the proposed standard?**

   ☐ Yes

   ☒ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments: We are concerned that the scope of "... the protocol shall define a rigorous script for the Sender and Receiver of information" is too prescriptive yet not exhaustive enough to cover all situations. We support the notion of defining standard terms to be used in operation personnel communication, but do not believe predetermined script is required in every communication situation, nor do we think it is possible to have a set of scripts that covers all possible cases.

3. **The proposed standard will be applicable to Transmission Operators, Balancing Authorities, Reliability Coordinators, Generator Operators and Distribution Providers. Do you agree with the proposed applicability?**

   ☒ Yes

   ☐ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments:

4. **The SAR includes a list of standards that include requirements that involve the issuing or receipt of real-time communications. If you are aware of additional requirements, beyond those listed on pages 8-9, please identify them here.**

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   Comments:

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	Kathleen Goodman	
Organization:	ISO New England	
Telephone:	(413) 535-4111	
E-mail:	kgoodman@iso-ne.com	
NERC Region		**Registered Ballot Body Segment**
☐ **ERCOT** ☐ **FRCC** ☐ **MRO** ☒ **NPCC** ☐ **RFC** ☐ **SERC** ☐ **SPP** ☐ **WECC** ☐ **NA – Not Applicable**	☐	1 — Transmission Owners
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Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region*	Segment*
			1

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1. **Do you believe that there is a reliability-related need to establish a set of communications protocols to improve situational awareness and shorten response time?**

   ☒ Yes

   ☒ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments: ISO New England supports establishing communication protocols to define consistent emergency determinations. However, the standard should not extend to establishing pre-defined scripts that operators must follow in their communications without the element of judgement and discussion that are needed in such situations.

2. **Do you agree with the scope of the proposed standard?**

   ☒ Yes

   ☒ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments: See response Question #1.

3. **The proposed standard will be applicable to Transmission Operators, Balancing Authorities, Reliability Coordinators, Generator Operators and Distribution Providers. Do you agree with the proposed applicability?**

   ☒ Yes

   ☐ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments:

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   Comments: No others.

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	Brian F Thumm	
Organization:	ITC Transmission	
Telephone:	248-374-7846	
E-mail:	bthumm@itctransco.com	
NERC Region		**Registered Ballot Body Segment**
☐ **ERCOT** ☐ **FRCC** ☐ **MRO** ☐ **NPCC** ☒ **RFC** ☐ **SERC** ☐ **SPP** ☐ **WECC** ☐ **NA – Not Applicable**	☒	1 — Transmission Owners
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1. **Do you believe that there is a reliability-related need to establish a set of communications protocols to improve situational awareness and shorten response time?**

   ☒ Yes

   ☐ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments:

2. **Do you agree with the scope of the proposed standard?**

   ☐ Yes

   ☒ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments: The SAR scope needs to be clear in that it refers to specific protocols for communication, and not to "scripted" responses for every situation. Although the SAR discusses the use of protocols, other context of the remaining passages in the SAR lead one to believe otherwise.

3. **The proposed standard will be applicable to Transmission Operators, Balancing Authorities, Reliability Coordinators, Generator Operators and Distribution Providers. Do you agree with the proposed applicability?**

   ☒ Yes

   ☐ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments:

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	Michael Gammon	
Organization:	Kansas City Power & Light	
Telephone:	816-654-1242	
E-mail:	816-654-1245	
NERC Region		**Registered Ballot Body Segment**
☐ **ERCOT**	☒	1 — Transmission Owners
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1. **Do you believe that there is a reliability-related need to establish a set of communications protocols to improve situational awareness and shorten response time?**

   ☐ Yes

   ☒ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments: Not to the extent this SAR is addressing itself. The Black Out Report is overly broad and vague regarding this issue. This SAR would make more sense if it were addressing itself to tightening existing protocols and documenting them between entities. The way this SAR has been presented, pre-defined terms would have to be developed. Who would be responsible to determine what these pre-defined terms would be and would the terms be applicable to all operating entities? Adjacent operating entities have a long history of communicating and differing terms are understood.

2. **Do you agree with the scope of the proposed standard?**

   ☐ Yes

   ☒ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments: The SAR description suggests establishment of "protocols shall define a rigorous script" to be followed. It would be impracticle to presume to think through every operating condition that scripting would require. Although the notion of everyone using the same terms or phrases sounds good, the development of such an operating "dictionary" is not practicle. Who will be the final word on terminology the industry must adopt that changes the way in which operating entities have described their adopted practices and procedures for decades?

   The scope of the SAR should limit itself to the principles of effective communication for operating entities to follow and not so prescriptive such as pre-definition of terms. Operating entities are smart enough to be able to use effective communication principles in a standard to determine and document communication protocols and terminology between them that provides effective communication. The same should apply between Reliability Coordinators. Follow the basic standards development: a standard should not say how something should be done, it should say what the required outcome should be.

3. **The proposed standard will be applicable to Transmission Operators, Balancing Authorities, Reliability Coordinators, Generator Operators and Distribution Providers. Do you agree with the proposed applicability?**

   ☒ Yes

   ☐ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments:

4. **The SAR includes a list of standards that include requirements that involve the issuing or receipt of real-time communications. If you are aware of additional requirements, beyond those listed on pages 8-9, please identify them here.**

   ☐ The following list of requirements involves the issuing or receipt of real-time communications:

   Comments:

5. **Please provide any other comments (that you have not already provided in response to the first four questions on this form) that you have on the revised SAR.**
   Comments:

Comment Form — 1st Draft of SAR for Operating Personnel Communications Protocols

Please use this form to submit comments on the proposed SAR for Operating Personnel Communications Protocols. Comments must be submitted by **April 17, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.net with the abbreviation "Protocols" in the subject line. If you have questions please contact **Harry Tom** at Harry.Tom@nerc.net or by telephone at 609-452-8060.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	Robert Coish	
Organization:	Manitoba Hydrot	
Telephone:	204-487-5479	
E-mail:	rgcoish@hydro.mb.ca	
NERC Region		**Registered Ballot Body Segment**
☐ **ERCOT**	☒	1 — Transmission Owners
☐ **FRCC**	☐	2 — RTOs, ISOs
☒ **MRO**	☒	3 — Load-serving Entities
☐ **NPCC**	☐	4 — Transmission-dependent Utilities
☐ **RFC**	☒	5 — Electric Generators
☐ **SERC**	☒	6 — Electricity Brokers, Aggregators, and Marketers
☐ **SPP**	☐	7 — Large Electricity End Users
☐ **WECC**	☐	8 — Small Electricity End Users
☐ **NA – Not Applicable**	☐	9 — Federal, State, Provincial Regulatory or other Government Entities
	☐	10 - Regional Reliability Organizations and Regional Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region*	Segment*

*If more than one region or segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

Background Information

The need for improved real-time communications protocols was identified during the investigation of the August 2003 Blackout. Blackout Recommendation #26 is: "Tighten communications protocols, especially for communications during alerts and emergencies. Upgrade communication system hardware where appropriate." (Note that this SAR does not include the second part of this recommendation regarding the upgrade to communication system hardware.)

This SAR proposes developing a set of standardized communication protocols for system operators to use during normal and emergency operations to improve situational awareness and shorten response time.

The requirements for communications protocols may be developed and then distributed to relevant standards and/or may be developed and retained in one or more specialized standards.

Please review the SAR and then answer the questions on the following page.

Comment Form — 1st Draft of SAR for Operating Personnel Communications Protocols

You do not have to answer all questions.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. **Do you believe that there is a reliability-related need to establish a set of communications protocols to improve situational awareness and shorten response time?**

   ☒ Yes

   ☐ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments:

2. **Do you agree with the scope of the proposed standard?**

   ☐ Yes

   ☒ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments: The scope of this SAR is much to far reaching. It appears that the intention is for the this Standard to reach into the intra region operation. This could become a safety issue as Utility Safety Rule Books could be in conflict with terminalogy being proposed by the standard writer. Getting this standard accepted by the industry at large will be a major hurtle to jump.

3. **The proposed standard will be applicable to Transmission Operators, Balancing Authorities, Reliability Coordinators, Generator Operators and Distribution Providers. Do you agree with the proposed applicability?**

   ☒ Yes

   ☐ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments:

4. **The SAR includes a list of standards that include requirements that involve the issuing or receipt of real-time communications. If you are aware of additional requirements, beyond those listed on pages 8-9, please identify them here.**

   ☐ The following list of requirements involves the issuing or receipt of real-time communications:

   Comments: If it is the intention of the standard writer to re write these requirements into scripts than we see problems, especially if it is intended to push these scripts into the entities' intra region operating procedures.

5. **Please provide any other comments (that you have not already provided in response to the first four questions on this form) that you have on the revised SAR.**

Comments: We believe that there is a need to clean up the communication protocol in as far as full name identification of all parties for all communications between entities and three part comunication: the sender giving the information or direction, the receiver repeating the information or direction back as to his understanding, and the reciever confirming or correcting the repeated statement. If there is a correction than the process is repeated.

A glossary of terms for industry standard operating terms is essential. This glossary with input from the entities should be an integral part of this SAR.

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region		**Registered Ballot Body Segment**
☐ **ERCOT** ☐ **FRCC** ☐ **MRO** ☐ **NPCC** ☐ **RFC** ☐ **SERC** ☐ **SPP** ☐ **WECC** ☐ **NA – Not Applicable**	☐	1 — Transmission Owners
	☐	2 — RTOs, ISOs
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	☐	7 — Large Electricity End Users
	☐	8 — Small Electricity End Users
	☐	9 — Federal, State, Provincial Regulatory or other Government Entities
	☐	10 - Regional Reliability Organizations and Regional Entities

Group Comments (Complete this page if comments are from a group.)

Group Name: Midwest Standards Collaboration Group

Lead Contact: **Terry Bilke**

Contact Organization: **Midwest ISO**

Contact Segment: **2**

Contact Telephone: **317-249-5463**

Contact E-mail: **tbilke@midwestiso.org**

Additional Member Name	Additional Member Organization	Region*	Segment*
David Lemmons	Xcel Energy	MRO	6
Jim Cyrulewski	JDRJC Associates	MRO	8

*If more than one region or segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

Background Information

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This SAR proposes developing a set of standardized communication protocols for system operators to use during normal and emergency operations to improve situational awareness and shorten response time.

The requirements for communications protocols may be developed and then distributed to relevant standards and/or may be developed and retained in one or more specialized standards.

Please review the SAR and then answer the questions on the following page.

You do not have to answer all questions.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. **Do you believe that there is a reliability-related need to establish a set of communications protocols to improve situational awareness and shorten response time?**

   ☒ Yes

   ☐ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments:

2. **Do you agree with the scope of the proposed standard?**

   ☐ Yes

   ☒ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments: The recommendation from the blackout report is overly broad and vague. Tightening does not sound like a complete overhaul but rather tweaking the existing protocols and documenting them if they are informal. This may not even require a standard across all functional entities. For instance, establishing a common lexicon makes sense at face value; however, it may not be needed for communications between neighboring BAs. BAs and TOPs in a given region have long history of communication and differing terms are already understood. However, for communications that occur between regional areas, there may be a need for common terms.

   We do not agree with the concept of a rigorous script for communications. This sounds like it would require the team to identify any operational situation that could ever occur and then establish a script. If this were possible, it would be great. However, it is not possible. This is why we have trained (yes there is a training standard) operators to make decisions when new operational situations occur.

   The SAR also proposes that any reliability impacts beyond a Reliability Coordinator's area must be coordinated and approved by the impacted Reliability Coordinator. This is certainly a laudable goal but is not reasonable in all cases. If there is an IROL violation in RC A's area and the action the RC would take would impact the area of RC B, RC A could not take action until RC B approved the action. Let's assume the impact on RC B is that a small load would be radialized when RC A opens a circuit to correct the IROL. This seems like a small risk to subject to RC B since the action will immediately correct the IROL. After the IROL is corrected, then RC A and RC B could begin determining other options. With the proposed language in the SAR, RC A would have violated this standard even though they eliminated that risk of more widespread outages.

3. **The proposed standard will be applicable to Transmission Operators, Balancing Authorities, Reliability Coordinators, Generator Operators and Distribution Providers. Do you agree with the proposed applicability?**

   ☐ Yes

   ☒ No

   If "No," please explain why in the comment area below and provide supporting information.

Comments: We agree that these functional entities should be considered for applicability; however, it is possible that the final standard should not apply to all of them. Further examination of the reason for the recommendation of the from the blackout report would help determine this.

4. **The SAR includes a list of standards that include requirements that involve the issuing or receipt of real-time communications. If you are aware of additional requirements, beyond those listed on pages 8-9, please identify them here.**

   ☐ The following list of requirements involves the issuing or receipt of real-time communications:

   Comments:

5. **Please provide any other comments (that you have not already provided in response to the first four questions on this form) that you have on the revised SAR.**
   Comments:

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region		**Registered Ballot Body Segment**
☐ **ERCOT** ☐ **FRCC** ☐ **MRO** ☐ **NPCC** ☐ **RFC** ☐ **SERC** ☐ **SPP** ☐ **WECC** ☐ **NA – Not Applicable**	☐	1 — Transmission Owners
	☐	2 — RTOs, ISOs
	☐	3 — Load-serving Entities
	☐	4 — Transmission-dependent Utilities
	☐	5 — Electric Generators
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	☐	7 — Large Electricity End Users
	☐	8 — Small Electricity End Users
	☐	9 — Federal, State, Provincial Regulatory or other Government Entities
	☐	10 - Regional Reliability Organizations and Regional Entities

Group Comments (Complete this page if comments are from a group.)

Group Name: Midwest Reliability Organization

Lead Contact: **Neal Balu**

Contact Organization: **MRO for Group (WPS Corporation for Contact)**

Contact Segment: **10**

Contact Telephone: **920-433-1846**

Contact E-mail: **NJBalu@wisconsinpublicservice.com**

Additional Member Name	Additional Member Organization	Region*	Segment*
Terry Bilke	MISO	MRO	10
Alan Boesch	NPPD	MRO	10
Robert Coish, Chair	MHEB	MRO	10
Carol Gerou	MP	MRO	10
Ken Goldsmith	ALT	MRO	10
Todd Gosnell	OPPD	MRO	10
Jim Haigh	WAPA	MRO	10
Tom Mielnik	MEC	MRO	10
Pam Oreschnick	Xcel	MRO	10
Dick Pursley	GRE	MRO	10
Dave Rudolph	BEPC	MRO	10
Eric Ruskamp	LES	MRO	10
Michael Brytowski, Secretary	MRO	MRO	10
27 Additional members		MRO	10

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Background Information

The need for improved real-time communications protocols was identified during the investigation of the August 2003 Blackout. Blackout Recommendation #26 is: "Tighten communications protocols, especially for communications during alerts and emergencies. Upgrade communication system hardware where appropriate." (Note that this SAR does not include the second part of this recommendation regarding the upgrade to communication system hardware.)

This SAR proposes developing a set of standardized communication protocols for system operators to use during normal and emergency operations to improve situational awareness and shorten response time.

The requirements for communications protocols may be developed and then distributed to relevant standards and/or may be developed and retained in one or more specialized standards.

Please review the SAR and then answer the questions on the following page.

Comment Form — 1st Draft of SAR for Operating Personnel Communications Protocols

You do not have to answer all questions.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. **Do you believe that there is a reliability-related need to establish a set of communications protocols to improve situational awareness and shorten response time?**

   ☒ Yes

   ☐ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments:

2. **Do you agree with the scope of the proposed standard?**

   ☐ Yes

   ☒ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments: .
   The scope need not be so expansive , it should start at a high level with no scripted message.

   We do not agree with the concept of a rigorous script for communications. This sounds like it would require the team to identify any operational situation that could ever occur and then establish a script. If this were possible, it would be great. However, it is not possible. This is why we have trained (yes there is a training standard) operators to make decisions when new operational situations occur.

   The Communication Training can be made part of Operator Training Procedures.

3. **The proposed standard will be applicable to Transmission Operators, Balancing Authorities, Reliability Coordinators, Generator Operators and Distribution Providers. Do you agree with the proposed applicability?**

   ☐ Yes

   ☒ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments: We agree that these functional entities should be considered for applicability; and in addition it should apply to Interchange Coordinator Function.

4. **The SAR includes a list of standards that include requirements that involve the issuing or receipt of real-time communications. If you are aware of additional requirements, beyond those listed on pages 8-9, please identify them here.**

   ☒ The following list of requirements involves the issuing or receipt of real-time communications: EOP-001-0 Attachment 1

Comments:

5. **Please provide any other comments (that you have not already provided in response to the first four questions on this form) that you have on the revised SAR.**
   Comments: Proof of the pudding is in tightly defining the Requirements and stipulating the Severity Levels and VRFs accurately so that the penalties are commensurate with the severity level and the VRF.

   Is there a consistent methodology between IRO-014-1 R1.1 footnote 1 and CIP-008-1 R1.2?

   Is IRO-001-1 R3 a repeat of IRO-005-2 R3?

   There is an overlapping request for requirements for communication facilities for use during emergencies. These requests are made in this SAR (Operating Personnel Communications Protocols Project 2007-02) and in the SAR for Project 2006-06 Reliability Coordination-Attachment 1. Perhaps both the associated drafting teams could work together so that there are no overlapping requirements among developed standards. We do not see the purpose behind not including the recommendation regarding the upgrade to communication system hardware in this SAR. This SAR should include , if need be, the recommendations to upgrade communication system hardware.

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region		**Registered Ballot Body Segment**
☐ **ERCOT** ☐ **FRCC** ☐ **MRO** ☒ **NPCC** ☐ **RFC** ☐ **SERC** ☐ **SPP** ☐ **WECC** ☐ **NA – Not Applicable**	☐	1 — Transmission Owners
	☐	2 — RTOs, ISOs
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	☐	9 — Federal, State, Provincial Regulatory or other Government Entities
	☒	10 - Regional Reliability Organizations and Regional Entities

Group Comments (Complete this page if comments are from a group.)

Group Name: NPCC CP9, Reliability Standards Working Group

Lead Contact: **Guy V. Zito**

Contact Organization: **Northeast Power Coordinating Council**

Contact Segment: **10**

Contact Telephone: **212-840-1070**

Contact E-mail: **gzito@npcc.org**

Additional Member Name	Additional Member Organization	Region*	Segment*
Ralph Rufrano	New York Power Authority	NPCC	1
Ron Falsetti	The IESO, Ontario	NPCC	2
Roger Champagne	TransEnergie, HydroQuebec	NPCC	1
Randy Macdonald	New Brunswick System Operator	NPCC	2
Herb Schrayshuen	National Grid US	NPCC	1
Al Adamson	New York State Reliability Council	NPCC	10
Kathleen Goodman	ISO New England	NPCC	2
David Kiguel	Hydro One Networks	NPCC	1
William Shemley	ISO New England	NPCC	2
Murale Gopinathan	Northeast Utilities	NPCC	1
Guy V. Zito	NPCC	NPCC	10
Greg Campoli	New York ISO	NPCC	2
Donald Nelson	MA Department of Tel and Energy	NPCC	9
Ed Thompson	ConEd	NPCC	1
Michael Ranalli	National Grid US	NPCC	1
Michael Gildea	Constallation Energy	NPCC	5
Michael Schiavone	National Grid US	NPCC	1

*If more than one region or segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

Background Information

The need for improved real-time communications protocols was identified during the investigation of the August 2003 Blackout. Blackout Recommendation #26 is: "Tighten communications protocols, especially for communications during alerts and emergencies. Upgrade communication system hardware where appropriate." (Note that this SAR does not include the second part of this recommendation regarding the upgrade to communication system hardware.)

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The requirements for communications protocols may be developed and then distributed to relevant standards and/or may be developed and retained in one or more specialized standards.

Please review the SAR and then answer the questions on the following page.

Comment Form — 1st Draft of SAR for Operating Personnel Communications Protocols

You do not have to answer all questions.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. **Do you believe that there is a reliability-related need to establish a set of communications protocols to improve situational awareness and shorten response time?**

   ☒ Yes

   ☒ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments: NPCC participating members agree with the need to establish communication protocols to define consistent emergency determinations. However, the standard should not extend to establishing pre-defined scripts that operators must follow in their communications without the element of judgement and discussion that are needed in such situations.

2. **Do you agree with the scope of the proposed standard?**

   ☒ Yes

   ☒ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments: See our comments to question 1

3. **The proposed standard will be applicable to Transmission Operators, Balancing Authorities, Reliability Coordinators, Generator Operators and Distribution Providers. Do you agree with the proposed applicability?**

   ☒ Yes

   ☐ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments:

4. **The SAR includes a list of standards that include requirements that involve the issuing or receipt of real-time communications. If you are aware of additional requirements, beyond those listed on pages 8-9, please identify them here.**

   ☐ The following list of requirements involves the issuing or receipt of real-time communications:

   Comments: No others.

5. **Please provide any other comments (that you have not already provided in response to the first four questions on this form) that you have on the revised SAR.**
   Comments: NPCC participating members agree with the concepts in the SAR.

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	Michael Calimano	
Organization:	New York Independent System Operator	
Telephone:	518-356-6129	
E-mail:	mcalimano@nyiso.com	
NERC Region		**Registered Ballot Body Segment**
☐ **ERCOT** ☐ **FRCC** ☐ **MRO** ☒ **NPCC** ☐ **RFC** ☐ **SERC** ☐ **SPP** ☐ **WECC** ☐ **NA – Not Applicable**	☐	1 — Transmission Owners
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	☐	10 - Regional Reliability Organizations and Regional Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region*	Segment*

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Comment Form — 1st Draft of SAR for Operating Personnel Communications Protocols

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1. **Do you believe that there is a reliability-related need to establish a set of communications protocols to improve situational awareness and shorten response time?**

   ☒ Yes

   ☒ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments: see comment in #2

2. **Do you agree with the scope of the proposed standard?**

   ☐ Yes

   ☒ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments: The NYISO is concerned that the scope of "... the protocol shall define a rigorous script for the Sender and Receiver of information" is too prescriptive yet not exhaustive enough to cover all situations. We support the notion of defining standard terms to be used in operation personnel communication, but do not believe predetermined script is required in every communication situation, nor do we think it is possible to have a set of scripts that covers all possible cases.

3. **The proposed standard will be applicable to Transmission Operators, Balancing Authorities, Reliability Coordinators, Generator Operators and Distribution Providers. Do you agree with the proposed applicability?**

   ☒ Yes

   ☐ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments:

4. **The SAR includes a list of standards that include requirements that involve the issuing or receipt of real-time communications. If you are aware of additional requirements, beyond those listed on pages 8-9, please identify them here.**

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   Comments:

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Group Comments (Complete this page if comments are from a group.)

Group Name: Public Service Commission of South Carolina

Lead Contact: **Phil Riley**

Contact Organization: **Public Service Commission of South Carolina**

Contact Segment: **9**

Contact Telephone: **803-896-5154**

Contact E-mail: **philip.riley@psc.sc.gov**

Additional Member Name	Additional Member Organization	Region*	Segment*
Mignon L. Clyburn	Public Service Commission of South Carolina	SERC	9
Elizabeth B. "Lib" Fleming	Public Service Commission of South Carolina	SERC	9
G. O'Neal Hamilton	Public Service Commission of South Carolina	SERC	9
John E. "Butch" Howard	Public Service Commission of South Carolina	SERC	9
Randy Mitchell	Public Service Commission of South Carolina	SERC	9
C. Robert "Bob" Moseley	Public Service Commission of South Carolina	SERC	9
David A. Wright	Public Service Commission of South Carolina	SERC	9

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Comment Form — 1st Draft of SAR for Operating Personnel Communications Protocols

You do not have to answer all questions.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. **Do you believe that there is a reliability-related need to establish a set of communications protocols to improve situational awareness and shorten response time?**

   ☒ Yes

   ☐ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments:

2. **Do you agree with the scope of the proposed standard?**

   ☒ Yes

   ☐ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments:

3. **The proposed standard will be applicable to Transmission Operators, Balancing Authorities, Reliability Coordinators, Generator Operators and Distribution Providers. Do you agree with the proposed applicability?**

   ☒ Yes

   ☐ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments:

4. **The SAR includes a list of standards that include requirements that involve the issuing or receipt of real-time communications. If you are aware of additional requirements, beyond those listed on pages 8-9, please identify them here.**

   ☐ The following list of requirements involves the issuing or receipt of real-time communications:

   Comments:

5. **Please provide any other comments (that you have not already provided in response to the first four questions on this form) that you have on the revised SAR.**
   Comments: The PSCSC believes the SAR should specifically acknowledge the power and effectiveness of three-part communications in ensuring common understanding of verbal exchanges. Three-part communications include the sender giving the information, the receiver repeating the information back, and the sender acknowledging the correctness of the repeated information. This form of communication is used in nuclear plant

communications and in other industries where it is critical that everyone involved has a common understanding of the intended message.

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region		**Registered Ballot Body Segment**
☐ **ERCOT**	☒	1 — Transmission Owners
☐ **FRCC**	☐	2 — RTOs, ISOs
☐ **MRO**	☒	3 — Load-serving Entities
☐ **NPCC**	☐	4 — Transmission-dependent Utilities
☐ **RFC**	☐	5 — Electric Generators
☒ **SERC**	☐	6 — Electricity Brokers, Aggregators, and Marketers
☐ **SPP**	☐	7 — Large Electricity End Users
☐ **WECC**	☐	8 — Small Electricity End Users
☐ **NA – Not Applicable**	☐	9 — Federal, State, Provincial Regulatory or other Government Entities
	☐	10 - Regional Reliability Organizations and Regional Entities

Group Comments (Complete this page if comments are from a group.)

Group Name: Southern Company Transmission

Lead Contact: **Roman Carter**

Contact Organization: **Southern Co. Transmission**

Contact Segment: **1**

Contact Telephone: **205-257-6027**

Contact E-mail: **jrcarter@southernco.com**

Additional Member Name	Additional Member Organization	Region*	Segment*
Marc Butts	Southern Co. Transmission	SERC	1
Fred Waites	Alabama Power Co.	SERC	3
JT Wood	Southern Co. Transmission	SERC	1
Jim Busbin	Southern Co. Transmission	SERC	1
Jim Griffith	Southern Co. Transmission	SERC	1

*If more than one region or segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

Background Information

The need for improved real-time communications protocols was identified during the investigation of the August 2003 Blackout. Blackout Recommendation #26 is: "Tighten communications protocols, especially for communications during alerts and emergencies. Upgrade communication system hardware where appropriate." (Note that this SAR does not include the second part of this recommendation regarding the upgrade to communication system hardware.)

This SAR proposes developing a set of standardized communication protocols for system operators to use during normal and emergency operations to improve situational awareness and shorten response time.

The requirements for communications protocols may be developed and then distributed to relevant standards and/or may be developed and retained in one or more specialized standards.

Please review the SAR and then answer the questions on the following page.

You do not have to answer all questions.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. **Do you believe that there is a reliability-related need to establish a set of communications protocols to improve situational awareness and shorten response time?**

   ☒ Yes

   ☒ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments: If all Owners, Operators, and Users of the Bulk Electric system adhered to the current NERC standards (and previous Operating Policies), we do not believe this standard would be necessary. However, we understand that this SAR is an attempt to make it very clear what is expected of a RC, TOP, BA, GO, and DP in way of communciations during emergency situations.

   We feel that this communication protocol should be only applicable under the current EEA Level 1 and above state or with the new Transmission Emergency state currrently being developed.

2. **Do you agree with the scope of the proposed standard?**

   ☒ Yes

   ☐ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments: As mentioned in the answer to question #1, we feel it should be applicable for EEA Level 1 and above or with the new Transmission Emergency state currently being developed.

3. **The proposed standard will be applicable to Transmission Operators, Balancing Authorities, Reliability Coordinators, Generator Operators and Distribution Providers. Do you agree with the proposed applicability?**

   ☒ Yes

   ☐ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments: However, there is only one "real time" requirement that is applicable to the DP. It is contained in TOP-001-1, R4.

4. **The SAR includes a list of standards that include requirements that involve the issuing or receipt of real-time communications. If you are aware of additional requirements, beyond those listed on pages 8-9, please identify them here.**

   ☒ The following list of requirements involves the issuing or receipt of real-time communications: IRO-016-1, R1

   Comments: We do not recommend bringing the requirement over to this SAR. It is better to leave in the IRO standards.

5. Please provide any other comments (that you have not already provided in response to the first four questions on this form) that you have on the revised SAR.

Comments:

*Under FERC staff's Preliminary Assessment contained on page 7 of the SAR (items i and ii), item ii should not be addressed in this SAR. There are numerous requirements in the IRO standards already that adequately cover communications to other RCs for situations in which a reliability impact may go beyond a RC's area of view. In particular, the following standard requirements address the 2nd part (ii): IRO-001-1, Req. 7; IRO-003-2, Req.1; IRO-004-1, Req.2; IRO-014-1, Req.1,2,3; IRO-015-1, Req.1,2; IRO-016-1, Req.1;

*If the SAR drafting team removes the requirements of the standards referenced in the "Related Standards" section of this SAR and move them to this SAR, it will become difficult for a Reliability Coordinator to know where to go for standards applicable to them. For example, currently most of the requirements related to real time actions taken by a RC are contained in the IRO standards. If the 4 IRO standard requirements are removed from the IRO standards and placed into this SAR, the RC system operators will now have to refer to more standards to find requirements related to their responsibilities. This same scenario also applies to the other standard drafting teams who are considering the same actions.

It would be helpful if NERC were to provide on the Standards Homepage a listing of standards by Function: RC, BA, TOP, etc. Then the RC could review the RC function and know all standards that are applicable to them in a quick and easy fashion.

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	Ron Taylor	
Organization:	Salt River Project	
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E-mail:	Ron.Taylor@srpnet.com	
NERC Region		**Registered Ballot Body Segment**
☐ **ERCOT** ☐ **FRCC** ☐ **MRO** ☐ **NPCC** ☐ **RFC** ☐ **SERC** ☐ **SPP** ☒ **WECC** ☐ **NA – Not Applicable**	☒	1 — Transmission Owners
	☐	2 — RTOs, ISOs
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Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region*	Segment*

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   ☐ Yes

   ☐ No

   If "No," please explain why in the comment area below and provide supporting information.

   Comments:

2. **Do you agree with the scope of the proposed standard?**

   ☐ Yes

   ☐ No

   If "No," please explain why in the comment area below and provide supporting information.

   Comments:

3. **The proposed standard will be applicable to Transmission Operators, Balancing Authorities, Reliability Coordinators, Generator Operators and Distribution Providers. Do you agree with the proposed applicability?**

   ☐ Yes

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   ☐ The following list of requirements involves the issuing or receipt of real-time communications:

   Comments:

5. **Please provide any other comments (that you have not already provided in response to the first four questions on this form) that you have on the revised SAR.**

Comments: The SAR is a proposal for protocols to be used over "pre-established communications paths". This is good as far as it goes. When Operations sits down to write up these protocols with their peers, I recommend that they have a Communications person from at least one of the utilities on the panel to initially clearly delineate what the recommended path(s) are between the subject utilities. This will be based on use of private systems first with the possibility of widespread unavailability of commercial services, etc.

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Group Comments (Complete this page if comments are from a group.)

Group Name: WECC Reliability Coordination Comments Work Group

Lead Contact: **Nancy Bellows**

Contact Organization: **WECC Reliability Coordination Subcommittee**

Contact Segment: **10**

Contact Telephone: **970-461-7246**

Contact E-mail: **bellows@wapa.gov**

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Mike Gentry	SRP	WECC	10
Bob Johnson	Xcel (PSC)	WECC	10
Frank McElvain	RDRC	WECC	10
Greg Tillitson	CMRC	WECC	10

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   ☒ Yes

   ☐ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments:

2. **Do you agree with the scope of the proposed standard?**

   ☒ Yes

   ☐ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments: While the WECC RCCWG agrees in general with the scope of the proposed standard, the work group has some questions and comments regarding terms used in the scope. The scope of the SAR may be widened to "establish and implement a lexicon of communications protocols and communications paths." Please define "communication path" as used in the scope - is this the expected communications between entities as opposed to the actual physical paths of those communications? Additionally, there is a general comment that establishment of a lexicon does not, in itself ensure pre-determined action as noted in the scope. What type of pre-determined actions are expected, operating or communications?

3. **The proposed standard will be applicable to Transmission Operators, Balancing Authorities, Reliability Coordinators, Generator Operators and Distribution Providers. Do you agree with the proposed applicability?**

   ☒ Yes

   ☐ No

   If "No," please explain why in the comment area below and provide supporting information.
   Comments: The WECC RCCWG generally agrees, but some questions remain. The standard will apply to TO, BA, GO, DP; however, the SAR (Applicability Section #2) states that all those entities "will be required to adopt and employ directives that use pre-defined terms, and will require entities that receive those directives to respond to the reliability coordinator using pre-defined terms." Entities that receive those directives should respond to the entity issuing the directives using pre-defined terms. Additionally, the WECC RCCWG believes that the SAR drafting committee should consider adopting the term "directive" for reliability coordinator issue only and adopt another term, such as "operating instructions" for those actions directed by other than the reliability coordinator to distinguish between the two terms.

4. **The SAR includes a list of standards that include requirements that involve the issuing or receipt of real-time communications. If you are aware of additional requirements, beyond those listed on pages 8-9, please identify them here.**

   ☐ The following list of requirements involves the issuing or receipt of real-time communications:

   Comments:

5. **Please provide any other comments (that you have not already provided in response to the first four questions on this form) that you have on the revised SAR.**
   Comments: