

Individual or group. (71 Responses)

Name (48 Responses)

Organization (48 Responses)

Group Name (23 Responses)

Lead Contact (23 Responses)

IF YOU WISH TO EXPRESS SUPPORT FOR ANOTHER ENTITY'S COMMENTS WITHOUT ENTERING ANY ADDITIONAL COMMENTS, YOU MAY DO SO HERE. (18 Responses)

Comments (71 Responses)

Question 1 (35 Responses)

Question 1 Comments (53 Responses)

Question 2 (37 Responses)

Question 2 Comments (53 Responses)

Question 3 (38 Responses)

Question 3 Comments (53 Responses)

Question 4 (53 Responses)

Question 4 Comments (53 Responses)

Individual
Molly Devine
Idaho Power Company
Yes
Yes
Yes
No
Group
SERC OC Review Group
Stuart Goza
No
The SERC OC Review Group appreciates the efforts that the SDT has made on this draft standard and the flexibility demonstrated to address the constantly evolving feedback received. We do not believe the proposed requirements and measures clearly delineate the differences in the actions required to be taken by the issuer and recipient depending upon

whether or not the Operating Instruction is being given to alleviate or avoid an Emergency.

Applicability Section: 4.1.2 Distribution Provider: We understand that it would be difficult to remove the Distribution Provider from the applicability of COM-002-4 per FERC's directives. Therefore, we are respectfully recommending an alternative that parallels the recently FERC approved CIP-003-5 that we believe accurately captures those DPs that receive Operating Instructions associated with the reliability of the BES. The following alternative to clarify those Distribution Providers that have an impact on the BES is recommended: 4.1.2 Distribution Provider that:

4.1.2.1 Has capability to shed 300 MW or more of load in a single manually initiated operation.

4.1.2.2 Has switching obligations related to Any Cranking Path and group of Elements meeting the initial switching requirements from a Blackstart Resource up to and including the first interconnection point of the starting station service of the next generation unit(s) to be started.

General Requirement Comment: The SDT is respectfully requested to review the Requirements to ensure that it is clear that "during an Emergency" is only applicable to the entities involved.

Requirement 1: The proposed standard still contains requirements that mandate the use of, and training to include, 3 part communications during issuance of all Operating Instructions, including those issued during non-Emergency situations. While we agree that the SDT has stated in its Rationale and Technical Justification document that the proposed measures don't specifically require that auditors verify compliance of this for the requirements (and associated measures), a strict read leads to a different conclusion. We are concerned that, absent a requirement that the issuer make a definitive statement as to whether an Operating Instruction is being issued to alleviate or avoid an Emergency, neither the recipient (during) nor an auditor (after) would be able to make such determination. We respectfully recommend modifying requirement 1 so that it applies to all Operating Instructions but requires that those being issued to alleviate or avoid an Emergency be specifically identified as such and that the issuer explicitly request recipient confirm their understanding through use of 3 part communication. To accomplish this we propose a new R1.1. The current R1.1 through R1.6 would be renumbered R1.2 through R1.7

Current R1 language: 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: [Violation Risk Factor: Low][Time Horizon: Long-term Planning]

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.

Proposed R1 language: 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: [Violation Risk Factor: Low][Time Horizon: Long-term Planning]

Proposed R1.1: ADD: Require that its operating personnel identify, at the time of issuance, when the Operating Instruction is being issued to alleviate or avoid an Emergency

R1.2: Based on the SDT comments and zero tolerance for Emergency communications we propose a new bullet be added to R1.2.

Current R1.2 language: 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. Proposed R1.2: 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. • ADD: Request recipient use 3 part communication when the Operating Instruction is being issued to alleviate or avoid an Emergency R1.3: We respectfully recommend a word change (correct to understood) in 1.3, bullet 1. Current 1.3 sub-bullet 1 follows: Repeat, not necessarily verbatim, the Operating Instruction and receive confirmation from the issuer that the response was correct. Proposed 1.3, sub-bullet 1: Repeat, not necessarily verbatim, the Operating Instruction and receive confirmation from the issuer that the response was understood. Requirement R2: This group feels that R2 should be eliminated as redundant with the systematic approach to training requirements of PER-005 (Operations Personnel Training) which are applicable to all BAs, RCs & TOPs. Communications protocols must be included in each company's specific reliability-related task list. Inherent in systematic approach is initial training on all reliability-related tasks, since each task must be analyzed as to its Difficulty, Importance & Frequency (DIF analysis). As a result of the DIF analysis, systematic approach would require that communications protocols have both initial and continuing training. Requirement R3: We agree with the SDT concern that Operating Personnel should not be placed in a position to receive an oral two-party, person-to-person Operating Instruction prior to being trained. This Group understands that OPCP SDT included an initial training requirement in the standard in response to the NERC Board of Trustees' resolution, which directs that a training requirement be included in the COM-002-4 standard. We would like to recommend that the term "initial" be removed so not to give the impression that training is a one-time effort. Current R3 language: 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: [Violation Risk Factor: Low][Time Horizon: Long-term Planning] Proposed R3 language: Each Distribution Provider and Generator Operator shall conduct 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: [Violation Risk Factor: Low][Time Horizon: Long-term Planning] Requirements R5, R6, and R7: This Group feels that the relationship between R1, R5, R6, and R7 requires further clarification to remove possible opportunities for different interpretations which could result in uncertainty as to whether the Operating Instruction is being issued to alleviate or avoid an Emergency. The concern centers on the absence of a requirement that the issuer make a definitive statement as to whether an Operating Instruction is being issued to alleviate or avoid an Emergency, neither the recipient (during) nor an auditor (after) would be able to make such determination. This is the reason for the

R1 modifications. If the recommended R1 modifications are accepted then R5, R6, and R7 should be considered for deletion (incorporating specific items deemed necessary by the SDT as bullets or sub-requirements of R1). Measures: Measure 1: Base on the Group's recommendations above we propose for consideration the following modification to Measure 1: Current M1 language: Each Balancing Authority, Reliability Coordinator, and Transmission Operator shall provide its documented communications protocols developed for Requirement R1. Proposed M1 language: Revised M1: Each Balancing Authority, Reliability Coordinator, and Transmission Operator shall provide its documented communications protocols developed for Requirement R1. For each Operating Instruction issued to alleviate or avoid an Emergency; entity shall provide evidence that it identified such at time Operating instruction was issued (R1.1) and requested recipient use of 3 part communication (R1.2). Measure 2,5,6,and 7: If our recommendations are accepted then Measures 2, 5, 6, and 7 should be deleted incorporating specific items deemed necessary by the SDT as bullets or sub-requirements of R1 Measure 3: To align M3 with our R3 recommendation we propose deleting the word "initial". Current M3 language: 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. Proposed M3 language: Each Distribution Provider and Generator Operator shall provide its training records for its operating personnel such as attendance logs, agendas, learning objectives, or course materials in fulfillment of Requirement R3.

We are concerned that this draft goes further than mentioned in the blackout recommendation that NERC should work with reliability coordinators and control area operators to improve the effectiveness of internal and external communications during alerts, emergencies, or other critical situations. This group feels that the modifications recommended will add further clarity in communications and work towards the goal identified in the Black Report recommendation number 26.

We believe that the VRFs/VSLs should be modified to better reflect the stated intent of the NERC Board of Trustees November 19th, 2013 Resolution, which is to enforce 'zero tolerance' only for failure to use 3 part communications by the issuer or recipient of an Operating Instruction when it is issued to alleviate or avoid an Emergency. VSL for R1: Modify Severe to include any instance where entity either (1) failed to identify, at the time of issuance, that the Operating Instruction is being issued to alleviate or avoid an Emergency or (2) failed to request recipient use 3 part communication when the Operating Instruction was issued to alleviate or avoid an Emergency Current VSL for R1 language: The responsible entity did not include Requirement R1, Part 1.2 in its documented communications protocols OR The responsible entity did not include Requirement R1, Part 1.3 in its documented communications protocols OR The responsible entity did not develop any documented communications protocols as required in Requirement R1. Proposed VSL for R1 language: Moderate - The responsible entity did not require the issuer and receiver of an oral or written Operating Instruction to use the English language, unless agreed to otherwise, as required in Requirement R1, Part 1.2. An alternate language may be used for internal operations. Severe - The responsible entity did not include Requirement R1, Part 1.1, in its

documented communications protocols OR Requirement R1, Part 1.3 in its documented communications protocols OR The responsible entity did not include Requirement R1, Part 1.4 in its documented communications protocols OR The responsible entity did not develop any documented communications protocols as required in Requirement R1 OR the responsible entity either (1) failed to identify, at the time of issuance, that the Operating Instruction is being issued to alleviate or avoid an Emergency or (2) failed to request recipient use 3 part communication when the Operating Instruction was issued to alleviate or avoid an Emergency. VSL for R3: This Group recommends that the “High VSL for R3” be deleted. The reason for the High VSL deletion is to align with the concept that the standard should provide that compliance with the standard should only entail assessing whether an entity has utilized their documented communications for Operating Instructions that are not issued during an Emergency. VSL for R2, R5, R6, and R7: If the SDT modifies the requirements based on this Group’s recommendation VSL for R2, R5, R6, and R7 can be deleted except for any sections that are applicable in revised requirements.

Yes

The SERC OC Review Group understands the position that the SDT is working in and greatly appreciates the patience and dedication shown in developing this draft standard. Thank you. The comments expressed herein represent a consensus of the views of the above named members of the SERC OC Review Group only and should not be construed as the position of the SERC Reliability Corporation, or its board or its officers.

Group

North American Generator Forum - Standards Review Team (NAGF-SRT)

Allen Schriver

Yes

Yes

1) R1.3 and R3 should also allow the receiver of an Operating Instruction to respond by explaining that a requested action cannot be performed (e.g., due to safety, equipment, regulatory, or statutory requirements as described in TOP-001 R3 and IRO-001 R8). The requirement to either repeat or request that the instruction be reissued does not account for the realistic situation that an entity may not be able to perform an Operating Instruction. 2) Specific to R.6, consideration should be given to revise the verbiage from, “during an Emergency” to “identified by the sender as constituting an Emergency directive.” The rationale for the recommendation is offered to provide clarity to the Requirement, as it is anticipated that there will be cases when it is not clear the Operating Instruction is associated with an Emergency. Additionally, the definition of “Emergency” in the NERC Glossary is broad and consequently it may be difficult, at times, to determine which inputs are subject to COM-002-4 requirements, especially if the TO or TOP calls a plant operator

directly rather than going through the respective dispatchers. Note: On the 1/17/14 COM-002-4 SDT webinar the question was asked, how a DP or GOP would know that an Operating Instruction occurred during an Emergency. The drafting team stated that after every Operating Instruction the DP should call its TOP to determine if the Operating Instruction occurred during and Emergency. The NAGF-SRT once again reiterates that it would be more efficient and the industry would benefit as a whole, if the sender of the Operational Instruction, states the instruction is associated with an Emergency. 3) Specific to Measures M5 and M6, which contain language associated with the issuer and the recipient both maintaining evidence of two-party communication respectively. It is recommended that M5 be revised such that the all associated evidence is maintained by the issuer and M6 be deleted in its entirety. Consolidating the evidence requirements would benefit the industry by reducing duplication of efforts, associated with maintaining evidence by different entities, in support of the same requirement.

Individual
Colin Jack
Dixie Power
Agree
NRECA
Individual
Paul Titus
Northern Wasco County PUD
Agree
NRECA
Group
Associated Electric Cooperative, Inc. - JRO00088
David Dockery
Agree
NRECA and SERC OC Review Group
Group
Salt River Project
Joshua Andersen
Yes
Yes
Yes
No

Individual
Kenn Backholm
Public Utility District No.1 of Snohomish County
Yes
While the Public Utility District No.1 of Snohomish County supports this draft of COM-002-4, we see an issue with R2 and R3 of this standard. These requirements both deal with entities conducting training for its personnel, and feel it would be more appropriate if they were addressed in the PER family of standards. The Public Utility District No.1 of Snohomish County also supports the comments submitted by the SERC OC Review Group. Thank you very much.
Individual
Jonathan Appelbaum
The United Illuminating Company
No
No
Yes
PER-005-2 introduced the concept of a Transmission Owner local control center that issues and receives instructions independent of a TOP, RC or BA. COM-002-4 should apply to Transmission Owners.
Individual
Daniel Duff
Liberty Electric Power LLC
Yes
Yes

No
The "Moderate" VSL for R6 should be modified in the same manner as the "Severe" VSL. In addition to repeating the Directive, the RE needs to fail to take action as directed. Suggest the following language: "AND the RE failed to take action as requested by the issuer of the Operating Instruction".
Yes
COM-002 remains a zero defect standard, and there is no FERC directive to provide a zero defect standard in response to either blackout recommendation 26 or Paragraph 535 of Order 693. Further, there is no requirement for the issuer of an Operating Instruction in an Emergency to indicate the Emergency status. The webinar response to queries over the lack of Emergency Status Indication was to suggest the RE "call and inquire" if the OI was in fact a Directive. This adds to the regulatory burden while offering zero benefit. Identification of an Emergency has positive effects far beyond three part communications. The realization of risk to the BES should create a heightened sense of urgency among all parties. The standard must require announcement of Emergency status in order to penalize RE's for actions which are not violations in a non-Emergency situation.
Group
Northeast Power Coordinating Council
Guy Zito
No
The proposed Requirements and Measures do not clearly delineate the differences in the actions required to be taken by the issuer and recipient depending upon whether or not the Operating Instruction is being given to alleviate or avoid an Emergency.
No
We do not agree that the blackout recommendation calls for the use of 3 part communication for every Operating Instruction and note that neither the NERC Board nor the SDT has provided any evidence that indicates a direct correlation between errors due to communication problems and events that adversely impact the BES. The justification for reliability standard Requirements that require 3 part communication for every Operating Instruction, and having to enforce compliance with the same, is not supported.
No
Regarding Requirement R4, the LOW VSL suggests that an entity is assigned a LOW VSL if assessments are conducted more than 12 months apart. There is no maximum or "cap" to the delayed assessment, and hence an entity may be 18, 19 or more months late in conducting the next assessment. In other standards this could well be assessed a MEDIUM or HIGH or even a SEVERE violation, depending on the time period that an entity failed the 12 month update requirement. Absent this "cap", or staggered caps, the proposed HIGH and SEVERE VSLs can only be assessed based on whether or not there was ever an assessment, even if the last assessment was done 3 or 4 years prior to an audit. This is inconsistent with the general guideline for VSLs. Regarding Requirement R5, the MEDIUM VSL and SEVERE VSL

are identical, except the latter has a condition that is associated with the impact of the violation. This is inconsistent with the intent of the VSL, which is to assess the “extent to which” the requirement was violated, not the impact of the violation which should be captured by the VRF. This is also inconsistent with the VSL principle and guideline. Suggest removing the MEDIUM VSL, and the condition under the proposed SEVERE VSL be: “AND instability, uncontrolled separation, or cascading failures occurred as a result.” The same comments apply for Requirements R6 and R7. We believe that the VRFs/VSLs should be modified to better reflect the stated intent of the NERC Board of Trustees November 19, 2013 Resolution, which is to enforce ‘zero tolerance’ only for failure to use 3 part communications by the issuer or recipient of an Operating Instruction when it is issued to alleviate or avoid an Emergency.

Yes

Regarding Part 1.4, it must be considered that some ISOs issue multiple-party burst Operating Instruction to Generator Operators through electronic means. Regarding Part 1.6, the requirement is vague and needs to be clarified for Registered Entities to know how to comply. How would one “specify the nomenclature” system wide? Regarding Requirements R2 and R3, those “training” requirements aren’t necessary. Responsible Entities must adhere to the Requirements of NERC Standards and how they accomplish this should not be dictated by a standard’s requirement. Under RAI principles, NERC and Regions can determine what type of monitoring is appropriate for Responsible Entities’ compliance with the new COM Standard based on the quality of their Training programs. This would further support reliability by changing the requirement from a one-time audit (i.e., initial training) to an ongoing assessment. The proposed standard still contains requirements that mandate the use of, and training to include 3 part communications during issuance of all Operating Instructions, including those issued during non-Emergency situations. As stated in the Rationale and Technical Justification document the proposed Measures and RSAW don’t specifically require that auditors verify compliance of this for the Requirements (and associated Measures), however a strict read leads us to a different conclusion. Under the RSAW for R1 it states that the entity shall provide its documented communications protocols developed for this requirement and the auditor shall review the documented communications protocols provided by the entity and ensure they address the Parts of R1 (including the use of 3 part communications). The RSAW contains similar actions relative to Requirements R2 and R3 in that the entity is to provide evidence consisting of agendas, learning objectives, or course materials that it provides pursuant to these requirements. Given this, an auditor can enforce to a ‘zero defect tolerance’ if the auditor chooses to do so, and in fact would argue that an audit would be deficient if it failed to validate whether the learning objective included ensuring that 3 part communication was used during issuance or receipt of each Operating Instruction. Suggest that the training requirements contained with R2 and R3 be removed and placed within the PER-005 Operations Personnel Training standard. PER-005 should be the home of all system operator related training requirements. There are no clear and concise differences between Requirements R1, R5 and R6. This creates uncertainty as to whether the Operating Instruction is being issued to alleviate or avoid an Emergency. Absent a Requirement that the issuer make a definitive statement as to

whether an Operating Instruction is being issued to alleviate or avoid an Emergency, neither the recipient (during) nor an auditor (after) would be able to make such determination. Suggest revising Requirement R1 so that it applies to all Operating Instructions, but requires that those being issued to alleviate or avoid an Emergency be specifically identified as such and that the issuer explicitly request that the recipient confirm their understanding through use of 3 part communication. Remove Requirements R5, R6 and R7 (incorporating items deemed necessary by the SDT as bullets or Parts of R1). Suggested rewording for Part 1.1: 1.1. Require that its operating personnel identify, at the time of issuance, that the Operating Instruction is being issued to alleviate or avoid an Emergency. • Request recipient use 3 part communication when the Operating Instruction is being issued to alleviate or avoid an Emergency. Revise M1, VRF/VSLs and RSAW so that strict compliance with use of 3 part communication is only applied when an Operating Instruction is issued to alleviate or avoid an Emergency as identified by the issuer at the time of issuance. Suggested revisions to M1: M1. Each Balancing Authority, Reliability Coordinator, and Transmission Operator shall provide its documented communications protocols developed for Requirement R1. For each Operating Instruction issued to alleviate or avoid an Emergency; entity shall provide evidence that it identified such at time Operating instruction was issued (R1.1) and requested recipient use of 3 part communication (R1.2). VSL for R1 – modify Severe to include any instance where entity either (1) failed to identify, at the time of issuance, that the Operating Instruction is being issued to alleviate or avoid an Emergency or (2) failed to request recipient use 3 part communication when the Operating Instruction was issued to alleviate or avoid an Emergency Measure M4 requires compliance demonstration beyond Requirement R4. Specifically, entities must provide evidence that appropriate corrective action was taken for 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. The format of the standard should be changed to conform with the current NERC direction—the measures get listed with the associated requirement, and the rationale get included in the standard, not a separate document.

Individual
Matthew P Beilfuss
Wisconsin Electric Power Company
Yes
The proscribed training requirements embedded in R2 and R3 should be removed. The existence and usage of protocols should be the primary focus of the standard and regulatory

review, creating a training requirement within the standard shifts focus to training content and administration. Additionally, PER-005-1 requires the Balancing Authority, Reliability Coordinator, and Transmission Operator to have a systematic approach to training (SAT). The adoption and management of a SAT would presumably include communications protocols as a task for potential training. The current draft version of PER-005-2 includes a similar requirement for a SAT applicable to the Generator Operator. The annual assessment and corrective action process defined in R4 should be made applicable to Operating Instructions during an Emergency. Although the NERC Glossary of terms provides a definition of Emergency, two reasonable people looking at a situation can disagree as to when an Operating Instruction is issued during an Emergency. Creating a zero defect standard applicable to inherently ambiguous situations shifts focus from the adoption of communication protocols to discussion of when an Operating Instruction is issued during an Emergency. During an entities annual assessment process, the focus would be on classification of an Emergency instead of process improvement for communications. An alternate approach would be to draft the standard so as to require the explicit identification of an Operating Instruction and/or Emergencies so as to remove the ambiguity. Finally, the definition of Operating Instruction references a command issued by operating personnel, without sufficiently defining operating personnel.

Individual

Thomas Borowiak

Citizens Electric Corporation

Agree

National Rural Electric Cooperative Association(NRECA)

Individual

Patricia Metro

NRECA

No

NRECA appreciates the efforts of the drafting team in working to address the FERC directives and NERC BOT Resolution November 2013, but does not believe that COM-002-4 accurately reflects the proper applicability for entities that have an impact on the operations of the Bulk Electric System in normal and emergency conditions. NRECA understands that the inclusion of Distribution Providers to this standard stems from various FERC directives, but because of the relationship of Distribution Providers with Transmission Operators as identified in NERC's functional model in being only a receiver of instructions to implement voltage reduction or to shed load to prevent the failure of the BES, or related to restoration activities as coordinated with the Transmission Operator; the TOP is ultimately responsible for the proper execution of the instructions, continues to recommend that Distribution Providers be removed from the applicability of COM-002-4. Knowing that it will be difficult to remove the Distribution Provider from the applicability of COM-002-4 per FERC's directives, NRECA is recommending an alternative that parallels the recently FERC approved CIP-003-5 that we

believe accurately captures those DPs that receive Operating Instructions associated with the reliability of the BES. The following alternative to clarify those Distribution Providers that have an impact on the BES is recommended: 4.1.2 Distribution Provider that: 4.1.2.1 Has capability to shed 300 MW or more of load in a single manually initiated operation. 4.1.2.2 Has switching obligations related to Any Cranking Path and group of Elements meeting the initial switching requirements from a Blackstart Resource up to and including the first interconnection point of the starting station service of the next generation unit(s) to be started. NRECA proposes to recommend an “affirmative” ballot to its members if the applicability is modified in the next posting as provided.

No

See response to Question 1

No

Will need to be modified dependent on applicability modifications.

Yes

NRECA suggests that the “assess adherence and assess effectiveness” language in R4 be removed from COM-002-4. This language is similar to the “Identify, Assess and Correct (IAC)” language that was included in the CIP V5 standards. The removal or modification of this language was included in the Final Rule on NERC CIP V5 Standards (Order No. 791). FERC stated that IAC language and concepts would be best addressed in the NERC compliance processes, such as through the NERC Reliability Assurance Initiative (RAI), rather than standards requirements.

Individual

Howard Hughes

SLEMCO

Agree

NRECA

Individual

Michelle R D'Antuono

Ingleside Cogeneration LP

Yes

Ingleside Cogeneration LP ("ICLP") believes that the requirements that govern directives issued during the course of an Emergency remain consistent with those in-place today. In addition, the latest draft of COM-002-4 allows oversight of all other Operating Instructions – although to a lesser degree. This is a good combination of compliance strategies that retains focus on the important communications while adding attention on daily discussions which may have impact on the BES if improperly transacted.

Yes

COM-002-4 adds requirements that call for protocols that add precision to operations communications as called for in both documents. However, in the latest draft, ICLP believes

the compliance approach has been modified in a manner that ensures that routine Operating Communications are conducted using a common protocol – but do not involve significant tracking resources. In addition, the use of operator training and regular review of its effectiveness is consistent with other NERC standards related to operator capabilities. As it is written now, CIP-002-4 introduces new expectations related to routine communications, but only puts incremental pressures on existing processes and equipment necessary to address them.

Yes

Yes

ICLP would like to see the innovative approach that the drafting team used to develop COM-002-4 applied to other standards as well. The issue that continues to arise is not so much whether mandatory requirements are based upon sound reliability principles, but how they can be reasonably enforced. In this case, it is clear that many entities do not have the tools or resources to examine every Operating Instruction in detail in order to assure 100% compliance with a rigorous communication protocol. Conversely, training and retention programs are common – and have proven to be an effective means to drive consistent Operator performance.

Individual

Jack Stamper

Clark Public Utilities

Yes

Yes

Yes

Yes

For the purposes of Requirements 5 and 6, Clark believes it should be an obligation of the issuer of Operating Instruction given during an emergency to identify it as an Emergency Operating Instruction. It should not an obligation of the reciever to determine after-the-fact whether an Operating Instruction is an Emergency or not. All Operating Instructions issued by a BA, RC, or TOP should be regarded with importance but a specification by the issuer that the instruction is in response to an Emergency will alert the receiver that a particular Operating Instruction action requirement has a role in the overall reliability of the BES resulting in a higher level of BES reliability.

Individual

Josh Dellinger

Glacier Electric Cooperative

Agree
NRECA
Individual
russ schneider
flathead co-op
Agree
Flathead supports the comments submitted by NRECA
Individual
Oliver Burke
Entergy Transmission
Agree
SERC OC Review Group
Individual
Donald E Nelson
Commonwealth of Massachusetts Department of Public Utilities
Agree
Northeast Power Coordinating Council (NPCC)
Individual
Thomas M. Haire
Rutherford EMC
Agree
NRECA
Individual
Venona Greaff
Occidental Chemical Corporation
Agree
Ingleside Cogeneration LP
Group
NERC Standards Review Forum
Russel Mountjoy
Yes
No
As it has been stated in previous comments, Recommendation 26 from the 2003 Blackout report is about situational awareness and who and what entities need to be contacted during emergencies. It is not about what System Operators should say in their conversations.
No

R1, The NSRF does not understand why there is a Severe VSL for normal everyday Operating Instructions. This Severe VSL is imposing the “zero defect” language that the industry is trying to move away from. We understand if there were no protocols as in “The responsible entity did not develop any documented communications protocols as required in Requirement R1”, but not the sub requirements of R1.2 and R1.3. The highest VSL should be High. Save the Severe VSL for R5, R6, and R7.

Yes

1. Per section one of this document, the SDT states: The Project 2007-02 SDT removed the term “Reliability Directive” in order to avoid complications that may result from the Notice of Proposed Rulemaking issued by the Federal Energy Regulatory Commission on November 21, 2013 proposing to remand the definition of “Reliability Directive.” But within the latest Implementation Plan, there still is the prerequisite of approving the term “Reliability Directive”. Please update whichever documentation that should be corrected in order to provide the industry with accurate information so that we can determine if this Standard supports the reliability of the BES.

Individual

William H. Chambliss

Virginia State Corporation Commission, Member OC

Yes

Yes

Yes

No

Group

Colorado Springs Utilities

Kaleb Brimhall

Southwest Power Pool

No

We do not agree with the following VSLs: 1) R4: The LOW VSL suggests that an entity is assigned a LOW VSL if assessments are conducted more than 12 months apart. There is no max or “cap” to the delayed assessment and hence an entity may be 18, 19 or more months late in conducting the next assessment. In other standards, this could well be assessed a MEDIUM or HIGH or even a SEVERE violation, depending on the time period that an entity failed the 12 month update requirement. Absent this “cap”, or staggered caps, the proposed

HIGH and SEVERE VSLs can only be assessed based on whether or not there was ever an assessment, even the last assessment was done 3 or 4 years prior to an audit. This is inconsistent with the general guideline for VSLs. 2) R5: The MEDIUM VSL and SEVERE VSL are identical, except the latter has a condition that is associated with the impact of the violation. This is inconsistent with the intent of the VSL, which is to assess the “extent to which” the requirement was violated, not the impact of the violation which should be captured by the VRF. This is also inconsistent with the VSL principle and guideline. We suggest removing the MEDIUM VSL, and the condition under the proposed SEVERE VSL that: “AND Instability, uncontrolled separation, or cascading failures occurred as a result.” 3) R6: Same comments as in R5. 4) R7: Same comments as in R5.

Yes

Comments: 1. R1.4. – [Documented communications protocols for its operating personnel that issue and receive Operating Instructions shall, at a minimum] 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. • Some ISO’s issues multiple-party burst Operating Instruction to Generator Operators through electronic means Associated real-time requirement: 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. Comment: The SRC does not believe this requirement is necessary for reliability. Moreover, the Standard Drafting Team has not provided any , nor have we been made aware of the substantiated rationale for keeping this Requirement except that the SDT believes is it necessary. 2. R1.6. – [Documented communications protocols for its operating personnel that issue and receive Operating Instructions shall, at a minimum] Specify the nomenclature for Transmission interface Elements and Transmission interface Facilities when issuing an oral or written Operating Instruction. Comment: This requirement is vague and needs to be clarified for Registered Entities to know how to comply with it; how would one “specify nomenclature” system-wide? Comment: This requirement was dropped from TOP-002-2a, requirement 18. Communication on transmission equipment must be equipment specific. Nomenclature should not be used, rather entities should always be correctly communicating using the unique and specific equipment identifiers. Adding nomenclature will reduce not improve reliability. 3. R2. and R3. – ...”shall conduct initial training for each of its operating personnel ...” Comment: The SRC does not believe a training Requirement is necessary; Responsible Entities must adhere to the Requirements of NERC Standards and how they accomplish this should not be dictated by a Standard Requirement. Under RAI principles, NERC and Regions can determine what type of monitoring is appropriate of Responsible Entities’ compliance with the new COM Standard based on the quality of their Training programs. This would further support reliability by changing the requirement from a one-time audit (i.e., initial training) to an ongoing assessment.

Individual

Shirley Mayadewi
Manitoba Hydro
Yes
Yes
Yes
Although Manitoba Hydro agrees with the VRFs and VSLs for the Requirements, we have the following comments: 1) VSLs, R2 – the term ‘individual operator’ is used in this VSL where throughout the standard operating personnel is used. 2) VSLs, R5 – text of VSLs refer to Requirement R6 instead of R5. 3) VSLs, R6 – inconsistent drafting as the words ‘that received an oral,’ is not included here, but does appear in the VSL for R7. 4) VSLs, R5, R6, R7 – the final criteria for a Severe VSL is for a specific outcome of non-compliance which does not seem appropriate when measuring compliance. Depending on the outcome of the circumstances, the VSL may be High or Severe. The outcome itself is not something that is related to the entity’s compliance with the standard. The entity may take the same action and comply to the same degree and by virtue of the outcome alone they are moved from a High to a Severe VSL.
Yes
1) The protocols at minimum should require full name identification. 2) R2 – the description of the applicable operating personnel (i.e. that are responsible for Real-Time operation of the interconnected BES) is different in this part than others (that state it’s for operating personnel that issue and receive certain Operating Instructions). Is that purposeful? 3) R5, R6, R7 and R8 - the numbering seems to be mixed up. 4) M2 and M3 – are not drafted consistently given the consistency in drafting of requirements R2 and R3. M3 refers to ‘its initial’ training records while M2 does not and M3 refers to training records ‘for its operating personnel’ while M2 does not. 5) M4 – contains a section of text that is not reflective of the requirement itself and has no basis for appearing in the measure. The requirement states only that the entity need only take corrective action to address deviations. The extra text that discusses instances where non adherence is the sole or partial cause of an Emergency should be deleted. 6) M6, M7 – the words ‘if the entity has such recordings’ seem unnecessary. This qualifying language isn’t attached to any other type of evidence that is listed as a possibility; presumably all of those are subject to the same qualifier and would only be presented as evidence if the entity had them.
Individual
Jason Snodgrass
Georgia Transmission Corporation

No

Comments: GTC recognizes FERC Order 693 directs the revision of COM-002 to include the DP and specifically states how essential it is that the TOP, BA and RC have communications with DPs. Additionally, GTC observes Order 693 also identifies the need for tightened communications protocols, especially for communications during alerts and emergencies and that such protocols shall be established with uniformity as much as practical on a continent wide basis to eliminate possible ambiguities in communications during emergency conditions. If the Standard requires the use of 3 part communications by the issuers of Operating Instructions, then it would seem sensible that receivers of Operating Instructions be trained for awareness and proper participation of such protocols. GTC sees parallels of this approach in other Standards such as restoration training of DPs identified in the TOPs restoration plan as required in EOP-005-2. GTC believes the current proposal of COM-002-4 still contains ambiguities that should be addressed before GTC can provide an affirmative ballot. GTC is offering 3 alternatives such that if any of them is adopted by the SDT, GTC would modify our position to cast an affirmative vote in the next recirculation. Alternative 1 (Modify the DP applicability): Applicability Section: 4.1.2 Distribution Provider: GTC is recommending an alternative that parallels the recently FERC approved CIP-003-5 that we believe accurately captures those DPs that receive Operating Instructions associated with the reliability of the BES when in an Emergency. The following alternative to clarify those Distribution Providers that have an impact on the BES is recommended: 4.1.2 Distribution Provider that: 4.1.2.1 Has capability to shed 300 MW or more of load in a single manually initiated operation. 4.1.2.2 Has switching obligations related to Any Cranking Path and group of Elements meeting the initial switching requirements from a Blackstart Resource up to and including the first interconnection point of the starting station service of the next generation unit(s) to be started. Alternative 2 (Modify the DP applicability per above, modify R3; Eliminate R6): Alternative 2 is an extension of alternative 1 for additional clarities. Requirement 3: Revise R3 to insert the words [during an Emergency] within the sentence "...who can receive an oral two-party, person-to-person Operating Instruction [during an Emergency] prior to that individual operator...". Additionally, replace the word "receive" with the word "request" in the first bullet of R3. The word "receive" is ambiguous and the word "request" is consistent with the receiver using his words to request a confirmation. GTC maintains that R3 is sufficient to satisfy FERC Order 693 for the DP applicability during emergencies, and would ensure uniformity on a continent wide basis to eliminate possible ambiguities in communications during emergency conditions. GTC prefers the elimination of R6. GTC does not believe that a receiver of an Operating Instruction in the field performing field switching activities should be required to document evidence of following the oral communication practices. Issuers of Operating Instructions are already recording the Operating Instruction communications and have the capability to do so. Issuers are also required to ensure the receiver responds accordingly per R5. Issuers are required to confirm the receiver's response is correct or else reissue if incorrect; issuers can also take an alternative action. Having the receiver document the implementation of these practices for compliance is redundant and duplicative to the issuer's requirements. This is an unnecessary, administrative requirement that introduces a double jeopardy situation that does not

enhance the reliability of the BES. The SDT should recognize that all reliability bases are covered with the training requirements of the issuers in R1, the training requirement of the receivers in R3, and the performance of these are monitored via the issuers recording capabilities in R5 and R7. With this approach, issuers can be satisfied that receivers are prepared to receive instructions in accordance with their training, and the options the issuers have per R5 in a live scenario. The receivers could not expose or cause a non-compliance situation to the issuers. However, the issuers could expose the receivers to a non-compliance situation if a recording is lost or damaged and the receiver was on his cell phone in the field taking orders and performing switching, hence the double jeopardy and GTC's plea to remove this requirement 6. Alternative 3 (Modify the DP applicability above, Modify R3 above, Modify R6, create separate DP requirement): Requirement 6: If the SDT decides that R6 must remain, then GTC requires the following changes to modify our negative vote to affirmative. GTC appreciates the drafting team making concessions to eliminate the need for DPs and GOPs being required to have documented communication protocols. Additionally, GTC appreciates the drafting team's willingness to limit the scope of performing the 3 part communications to those Operating Instructions received during an Emergency. These drafting team concessions are a testament to the team, along with industry, of understanding that the DP will typically have a very limited role in receiving Operating Instructions from the BA or TOP to protect the BES during an Emergency. This role is typically limited to operating non-BES equipment (load serving stations) to shed load or reduce voltage to prevent the failure of transmission facilities or generation supply that could adversely affect the reliability of the BES. GTC would submit that the TOP would further limit the DPs role to "manual" load shed type situations when the "automatic" load shed schemes misoperate or malfunction as designed. This is highlighted in the NERC functional model which identifies this real time function of the DP "Implements voltage reduction and sheds load as directed by the Transmission Operator or Balancing Authority". During an Emergency, which NERC defines as any abnormal 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 BES, the aforementioned function is what the DP will be called upon to implement. The ambiguity that arises is captured within the various types of utility registrations with NERC, and GTC believes the SDT can accommodate two distinct types of DPs which GTC believes to be critical to pass this Standard. GTC observed there are 298 entities in the NERC registry that are true DP function only. Most of these are DP/LSE and would not own BES assets, but they would be directly connected to the BES, hence registration. These entities own load serving substations and implementing voltage reduction or shedding load in an Emergency would not be ambiguous. However, GTC observed there are 242 entities in the NERC registry that are registered DPs, and also registered TOs that own BES assets. To these integrated entities, the scope of communications during an Emergency would be more ambiguous, as these entities may perform actions at transmission stations on a routine basis that the other DP only type entities would not have to consider. With the addition of R6 as written, these entities have an amplified burden of compliance risk associated with their TO registration even though R6 applies to them as a DP. This burden is the separation of those Operating Instructions performed at transmission stations

which occurs more often than the Emergency event which requires a manual operation for reduction of voltage or load shed at load serving stations. GTC believes this ambiguity is significant enough to justify the separation of the DP from R6 to provide a standalone requirement commensurate to the DPs function as documented in the NERC functional model. Proposed R6 language: Remove Distribution Provider from R6. Create a separate standalone requirement for the DP. R#. Each Distribution Provider that receives an oral two-party, person-to-person Operating Instruction to implement voltage reduction or shed load 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 request confirmation from the issuer that the response was correct, or * Request that the issuer reissue the Operating Instruction.

No

modify in accordance with selected alternative drafted above.

Yes

Comments: GTC suggests that the “assess adherence and assess effectiveness” language in R4 be removed from COM-002-4. This language is similar to the “Identify, Assess and Correct (IAC)” language that was included in the CIP V5 standards which FERC directed the removal of. The removal or modification of this language was included in the Final Rule of NERC CIP V5 (Order No. 791). FERC stated that IAC language was “overly-vague, lacking definition and guidance is needed” and that these control concepts would be best addressed in the NERC compliance processes, such as through the NERC Reliability Assurance Initiative (RAI), rather than standards requirements. Lastly, GTC recommends a revision to the NERC Glossary term Emergency. GTC recommends the removal of the terms “or limit” within this definition. One could argue that every single Operating Instruction is utilized to limit failures of transmission facilities. Emergency should be more appropriately defined without this ambiguity:
Proposed: Emergency or BES Emergency: Any abnormal system condition that requires automatic or immediate manual action to prevent the failure of transmission facilities or generation supply that could adversely affect the reliability of the Bulk Electric System.

Individual

Andrew Z. Pusztai

American Transmission Company, LLC

Yes

Yes

Yes

ATC recommends changing the language in Requirement 4 to read as follows: “Each Balancing Authority, Reliability Coordinator, and Transmission Operator shall at least once every calendar year, and no more than every 15 months: “ This would be consistent

with the NERC's annual requirement assessment made in NERC's Compliance Application Notice (CAN)- 0010 issued on November 16, 2011. In doing so, it should drive consistency among the CEA on how it is enforced.

Group

Southern Company; Southern Company Services, Inc; Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation and Energy Marketing

Marcus Pelt

Yes

Yes

No

R3 VSL is listed as high and severe; The concern is that if an operator receives instruction and performs accurately using 3-part, but can't show initial training for Operating Instruction and Operating instruction during an Emergency, would this warrant a high or severe VSL. While there is the potential of risk if Operating Instructions are received prior to being trained, this should not somehow imply that incorrect operations were performed as a result of no training. The severe category should be reserved only for those instances in which Operating Instructions were received prior to being trained *and* which resulted in an emergency operation or reliability issue. As a result, we suggest "demoting" each existing VSL to a lower level, and editing the High and Severe VSL and limit it to only those instances that resulted in an emergency operation or reliability issue (suggestions provided below). Low – An individual operator at the responsible entity receiving an Operating Instruction prior to being trained. Moderate – An individual operator at the responsible entity received an Operating Instruction during an Emergency prior to being trained. High – An individual operator at the responsible entity received an Operating Instruction prior to being trained *and* resulting in an emergency operation or reliability issue. Severe - An individual operator at the responsible entity received an Operating Instruction during an Emergency prior to being trained *and* resulting in an emergency operation or reliability issue.

No

R1.2: Correct the formatting of the third bullet to match the first two so that it is clear that there are three options permitted not just two with a sub bullet to number two. R3: Is worded a little confusing. Suggestion would be to add the text below. 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 that requires them to either: [Violation Risk Factor: Low][Time Horizon: Long-term Planning] • 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. R4 - In NERC's own Q&A document for RAI prepared by the Risk-Based Reliability Compliance Working Group (RBRCWG), the following statements are made: "An entity can voluntarily establish internal controls designed to reduce its control risk, which could have a positive influence on the scoping of compliance monitoring by the Regional Entity. Conversely, the entity can voluntarily elect to not establish internal controls or share them with the Regional Entity." This is inconsistent with the direction of the proposed Standard COM-002-4, R4. This not only requires an internal control, but also requires that the control be shared with the Regional Entity (during audits). Also, consider that an entity can develop and implement a robust communication protocol consistent with COM-002-4 requirements and flawlessly follow its communication protocol, yet be found in violation of COM-002-4 by failing to demonstrate that it has adequate (subjective) management (internal) controls in place. This is inconsistent with the RAI guidance provided by NERC regarding the voluntary nature of internal controls. So, in principle, internal controls should not be dictated in a reliability standard. This goes against the principle of "Results-Based" standards. The intended result is effective communications. This can be attained with Requirements 1 through 3. No one will argue that internal controls won't help ensure that the desired results are achieved. However, Requirement 4 is not absolutely necessary for the results to be achieved, and therefore, should not be included in the standard and should be removed.

Definition of Operating Instruction: The term "command" in the definition of Operating Instruction implies authority, and Southern believes it should be made clear that Operating Instructions (for purposes of this standard) are commands issued by those functional entities that are expressly granted the responsibility and authority by the NERC Reliability Standards to take actions or direct the actions of others to ensure the reliability of the BES. These are the Balancing Authority, Reliability Coordinator and Transmission Operator only. No other functions are expressly authorized in the NERC Reliability Standards to issue a command. Our proposed definition Operating Instruction should be: Operating Instruction — A command originated by a Balancing Authority, Transmission Operator or Reliability Coordinator 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.)

Measures: M4: The inclusion of Emergency here is inappropriate due to the non-inclusion of Emergency in R4. Also change the RSAW to reflect this change as well. Suggested rewording: "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 for all identified instances where operating personnel did not adhere to the 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. If read literally, EVERY breaker operation on the system IS an EMERGENCY. This causes a great deal of concern. From a DP and GOP standpoint, the RSAW and technical justification wording states that an attestation that no emergency had been called requiring a three part response would suffice for evidence. The rationale and technical justification document has some very good explanations of the INTENT of the drafting team and how they want the industry to view the standard requirements. If the standard and the subsequent audits adhered ONLY to what was in the justification document, then there should be little or no concerns. Unfortunately, the justification document carries no statutory weight and the standard as written does.

Individual

Michael Falvo

Independent Electricity System Operator

Yes

No

We do not agree with the following VSLs: i) R4: The LOW VSL suggests that an entity is assigned a LOW VSL if assessments are conducted more than 12 months apart. There is no max or “cap” to the delayed assessment and hence an entity may be 18, 19 or more months late in conducting the next assessment. In other standards, this could well be assessed a MEDIUM or HIGH or even a SEVERE violation, depending on the time period that an entity failed the 12 month update requirement. Absent this “cap”, or staggered caps, the proposed HIGH and SEVERE VSLs can only be assessed based on whether or not there was ever an assessment, even the last assessment was done 3 or 4 years prior to an audit. This is inconsistent with the general guideline for VSLs. ii) R5: The MEDIUM VSL and SEVERE VSL are identical, except the latter has a condition that is associated with the impact of the violation. This is inconsistent with the intent of the VSL, which is to assess the “extent to which” the requirement was violated, not the impact of the violation that should have been reflected by the VRF. This is also inconsistent with the VSL principle and guideline. We suggest removing the MEDIUM VSL, and the condition under the proposed SEVERE VSL that: “AND Instability, uncontrolled separation, or cascading failures occurred as a result.” iii) R6: Same comments as in R5. iv) R7: Same comments as in R5.

Yes

Recently, FERC directed NERC to eliminate the ambiguity with language “identify, assess, and correct” deficiencies for the CIP standards. Although it supported NERC’s move away from a “zero tolerance” approach to compliance, FERC wanted NERC provide more guidance regarding enforceability with the self-identify/assess/correct approach to compliance. NERC may want to consider that FERC may raise the same concerns with this proposed standard. According to the draft standard, if DPs and GOPs receive an Operating Instruction, they can provide an attestation from the issuer of the Operating Instruction to demonstrate

compliance – they do not need to develop documented communications protocols. The lighter compliance burden on DPs and GOPs may result in a higher administrative burden for the RC/BA/TOP to provide attestations.

Individual

David Thorne

Pepco Holdings Inc.

Yes

Please provide the rationale as to why the standard is not applicable to TOs.

Individual

Thomas Foltz

American Electric Power

No

The AND qualifier provided for R5 which qualifies that Instability, uncontrolled separation, or cascading failures occurred, should also be used for R3.

Yes

AEP believes the most recent changes represent a major step back in regards to clarity (as compared to the draft proposed in October 2013), and has driven us to change our voting position from affirmative to negative. We are concerned by the removal of Reliability Directive, and instead, now basing requirements on whether or not the communications are made during an Emergency. Who determines whether or not an Emergency state exists, and in addition, how would that be communicated? AEP recommends returning to the fundamentals and approach taken in the previous draft. If the phrase “Reliability Directive” is to be remanded, we encourage the drafting team to pursue alternative language which would not require the need to know whether or not the communications are being made during an “Emergency”. For example, perhaps the drafting team could change R1 (as taken from the October 2013 draft) to state something like the following: “Require the issuer to identify the action as a directive or instruction...”. R4.2: Though M4 specifies the kinds of evidence needed to meet R4, we believe it would be too subjective in determining whether or not the entity’s efforts properly assessed the effectiveness of the documented communications protocols.

Individual

Brian Evans-Mongeon

Utility Services, Inc

Yes
Smaller DPs and GOPs will have a significant problems demonstrating compliance with Requirement 6 as written. 1. As there is no requirement to notify these entities that an Operating Instruction is being issued during an Emergency, they will not be aware of which communications will be subject to compliance review. 2. Since these entities typically do not record phone conversations they would have to rely on other forms of evidence. Log book enties will not document if three part communication was used and since the entities are not made aware of Emergency conditions, they will not know to maintain a higher level of documentation to demonstrate compliance. 3. Approaching the issuer for confirmation of OIs during Emergency conditions and seeking Attestations from these entities will create a significant administrative burden not only for the small entities, but for the Issuer of the OI as well. 4. Any additional tasks that must be performed during Emergency situations runs contrary to the intent of the standard, which is to normalize communication protocols during all situations, and not have separate procedures during normal and Emergency conditions.
Individual
Christopher Wood
Platte River Power Authority
Yes
Platte River takes exception to the requirement for alpha-numeric clarifiers for communications.
Individual
Don Schmit
Nebraska Public Power District
No
Recommendation 26 calls for work to be done to improve the effectiveness of communications in emergency situations. The purpose of the standard is to improve communications. However, the focus of the standard is primarily 3-part communications.

There is no supporting documentation or data that 3-part communications improves the effectiveness of communications. Focusing on 3-part communications provides an easy target from a compliance perspective but all it teaches us is to mechanically repeat back what we have been instructed to do. We're focusing on the 'how' and 'what' rather than the 'why'. Keeping the 'why' in mind improves communications and the reliability of the BES. Keeping the 'why' in mind also leads to improved situational awareness. Improving effective communications is difficult to quantify in a standard and even more difficult to measure. We may be better off focusing on the principles contained in the OC's Reliability Guideline System Operator Verbal Communications – Current Industry Practices.

Yes

1) Applicability for Distribution Providers (DP's) should be qualified similar to qualification used for DP applicability in version 5 of CIP-003. Applicability needs to be focused on DP employees that may receive instructions relative to the BES. 2) R1: Since Requirements R5, R6 and R7 are zero tolerance, R1 protocols should state that when there is an emergency condition on the system that those issuing Operating Instructions during an emergency shall state that "this is an emergency". Reason Number 1, there needs to be a triggering mechanism that tells both the issuer and receiver that 3 part communication is zero tolerance and in effect during an emergency; Reason Number 2, there is question in the industry as to when the "emergency" begins and ends; and Reason Number 3 the RSAW for R5, R6 and R7 are telling the auditor (in the auditors note) to predetermine before an audit what are emergencies on an entities system, which could potentially create an issue of what is a determined emergency between the auditor and the entity. By inserting a triggering mechanism as suggested will create a demarcation for operating instructions during emergencies. 3) R2 and R3 are already provided for in PER-005 and therefore are redundant in this standard. If there is a need to include a training requirement in this standard, that requirement could consist of a statement to include protocol training in the entity's reliability task list. 4) R4 as written puts a huge administrative burden on entities to administer assessments of 'each' of its operating personnel that issue and/or receive Operating Instructions. As in previous drafts of this Standard, entities should determine and document their own assessments to the Standard and so that adherence and effectiveness fits their program. In addition, the 12-month requirement in the Standard now provides for an administrative burden and compliance trap in order to remain compliant to the 12-month requirement. We're a TOP and do many switching orders a day with operating personnel throughout the state. R4 requires us to assess adherence to communications protocols by our operating personnel (see FAQ #22 says "each" issuer/reciever) that receive these operating instructions and provide feedback to the operating personnel, and take corrective actions when appropriate. Currently, we have over 800 switch personnel, and some of these are not NPPD employees. We utilize personnel from some of our public power partners, such as rural power districts and municipalities. The 12 calendar month clock will be different for each person. So, day-to-day will be a challenge to ensure we capture compliance documentation on each person that changes the state of a BES element. The drafting team

should revert back language similar to R5 of posting #7 (with exception to the “implement” language) so that entities can manage their own compliance controls and can develop assessments that fit their program. NPPD would suggest the following for Requirement 4: R4. Each BA, RC and TOP shall have a documented method to evaluate the communication protocols developed in R1 that: 4.1 Assess adherence to the communications protocols developed in R1; 4.2 Assess the effectiveness of the communications protocols in R1; 4.3 Provide feedback to issuers and receivers of Operating Instructions; and 4.4 Modify communication protocols as necessary as a result evaluated communication protocols in this R4.

Group

Florida Municipal Power Agency

Frank Gaffney

Yes

Yes

Yes

Yes

FMPA is voting “affirmative” on this standard, yet we have concerns with the RSAW language and lack of criteria on how an entity will be assessed and audited. There is language in the RSAW “Notes to Auditor” for multiple requirements (R4-R7) that is of concern. (See example below) The RSAW language is not clear regarding the nature and extent of audit procedures that will be applied because there is reference to scoping the audit based on “certain risk factors to the Bulk Electric System”. It is not clear what “risk factors” will be used. As an example in R5 auditing “can range from exclusion of a 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.” This is essentially a zero tolerance approach, yet, also appears to be an attempt to apply Reliability Assurance Initiative (RAI) concepts, that have not been finalized and communicated to the industry. It is uncertain whether these concepts have been fully developed yet; and therefore, this leaves too much auditor discretion, without providing the industry information or criteria on how “risk” will be assessed. Stakeholders continue to await the details of these RAI concepts that are being utilized in RSAWS. Clarity is needed around how an entity’s risk to the BES will be assessed due to compliance or non-compliance with this standard. This would also be beneficial for an entity to know, so that they can lessen that risk, as appropriate. Example language from RSAW: “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. “

Group

Arizona Public Service Co.

Janet Smith

Yes

Yes

Yes

No

Group

PPL NERC Registered Affiliates

Brent Ingebrigtsen

Yes

These comments are submitted on behalf of the following PPL NERC Registered Affiliates: Louisville Gas and Electric Company and Kentucky Utilities Company; PPL EnergyPlus, LLC; PPL Electric Utilities Corporation; and PPL Generation, LLC, on behalf of its NERC registered entities. The PPL NERC Registered Affiliates are registered in six regions (MRO, NPCC, RFC, SERC, SPP, and WECC) for one or more of the following NERC functions: BA, DP, GO, GOP, IA, LSE, PA, PSE, RP, TO, TOP, TP, and TSP. Each of the PPL NERC Registered Affiliates recognize the need for and support the use of three part communications for Operating Instructions. However, we are abstaining from voting on this standard because we believe that the current version of COM-002-4 requires change to ensure consistency with the SDT’s intent. If these clarifications are made, the PPL NERC Registered Affiliates would support the proposed standard. First, the PPL NERC Registered Affiliates request that the SDT revise Measure M.4 to specifically state that sampling is allowed in performing the assessments required by Requirements R.4.1 and R.4.2. This is consistent with the SDT’s oral statements during the January 17, 2014 webinar and the FAQ (“An entity could perform an assessment by listening to random samplings of each of their operating personnel issuing and/or receiving Operating

Instructions....”). Additionally, for consistency and to avoid ambiguity, the SDT should also conform the wording in Measure M.4 to Measures M.5-M.7 (i.e., “Such evidence may include, but is not limited to,...”). Therefore, we recommend that the SDT revise Measure M.4 as follows: M4. Each Balancing Authority, Reliability Coordinator, and Transmission Operator shall provide evidence of its assessments. Such evidence may include, but is not limited to, sampling results, 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.... Second, the PPL NERC Registered Affiliates request that the SDT clarify in the proposed standard that only a failure to use three-part communications during an Emergency is a violation of COM-002-4. Therefore, we recommend that the standard’s requirements be further revised to indicate that if an entity does not adhere to its documented communications protocols developed in accordance with Requirement R.1 during a non-Emergency, such action shall not be considered a noncompliance event under Requirement R.1.

Individual

John Brockhan

CenterPoint Energy Houston Electric LLC

Yes

CenterPoint Energy agrees that the COM-002-4 standard addresses the NERC Board of Trustees 2013 Resolution.

Yes

CenterPoint Energy agrees that the COM-002-4 standard addresses both the August 2003 Blackout Report Recommendation 26 and FERC Order 693.

No

CenterPoint Energy does not agree with the Severe VSL for Requirement R1. The Company strongly believes that the focus of any Reliability Standard should be on enhancing the reliable operation of the BES and not on documents. Simply failing to document a procedure should never warrant a Severe VSL as long as the entity is operating according to the Standard.

Yes

CenterPoint Energy would like to thank the COM-002-4 Standard Drafting Team and appreciates the SDT’s time and effort dedicated in the development of this standard, in engaging the industry, and incorporating industry feedback into the standard. The removal of the requirement to identify an Operating Instruction in an emergency or a Reliability Directive to the receiver is viewed as a positive change. CenterPoint Energy believes that operating personnel’s focus should always be on monitoring and controlling the reliability of the BES rather than a compliance burden of correctly identifying and aligning company specific communication protocols to normal versus emergency operations. Overall, CenterPoint Energy agrees with the standard, but still has general concerns. The Company believes the prescriptiveness of the requirements: particularly R1.1 thru R1.6 exceeds the

necessary components needed in establishing communication protocols for tightened reliable communications.

Individual

David Jendras

Ameren

Agree

Ameren agrees with and supports the SERC OC comments on COM-002-4.

Group

Duke Energy

Michael Lowman

No

(1)Duke Energy believes that Operating Instruction during an Emergency is unclear, vague, and subject to interpretation. By using the NERC defined term of Emergency, certain tasks that Duke Energy believes is a non-emergency action would now be considered an Emergency and subject to zero tolerance. Duke submits, for consideration by the SDT, a revised definition of Emergency in an attempt to remove this ambiguity. Emergency – Any abnormal system condition that requires automatic or immediate manual action to prevent the failure of transmission facilities or generation supply that would adversely affect the reliability of the Bulk Electric System.

No

(1)Based on our comments to Question 1, Duke Energy does not believe that the SDT has addressed Recommendation 26 of the August 2003 Blackout report. The intent of the 2003 Blackout recommendation was to provide tighter communication during normal and emergency situations. Due to the ambiguity that exists between Operating Instruction and Operating Instruction during an Emergency, we believe that this recommendation was not addressed.

Yes

(1)Duke Energy suggests rewording R1.6 as follows: “Specify the nomenclature to be used for Transmission interface Elements and Transmission interface Facilities when issuing an oral or written Operating Instruction to neighboring entities.” While the Technical Justification document suggests that R1.6 applies to communication with neighboring entities, it is unclear that this requirement, as worded in the current draft of COM-002-4, is specifically discussing communication with neighboring entities. (2)M2 should include “initial training” and be reworded as follows in order to maintain consistency with the requirement: “Each Balancing Authority, Reliability Coordinator, and Transmission Operator shall provide initial 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.”

Individual
Marie Knox
MISO
Yes
We recommend the drafting team: (1) Remove the attestation for another provision (2) Restrict the zero-defect component of the standard to those operating instructions directly related to the emergency (e.g. redistpach instructions for IROLs, committment instructions during EEAs, synchronizing during restoration, etc.) (3) Maintain Reliability Directives in the toolkit as the clear indicator of an Operating Instruction that is directly applicable to the emergency. We believe that DPs and LSEs don't need stringent requirements. They just need to follow Directives or explain why they cannot. We understand that the drafting team is trying to meet a deadline, however we'd support the drafting team addressing all of the industry comments even if it requires more time to get this standard right.
Group
DTE Electric
Kathleen Black
Yes
Yes
No
The evidence needed to avoid violation is not clear. The VSL for R2 is not reasonable and an auditing nightmare. It should state an operator did not receive training on the documented communication protocol. Adding "prior to issuing an operating instruction" cannot be determined without excessive investigation. A check that all operators received training is appropriate. Same issue with R3 as listed for R2.
No
None
Individual
Catherine Wesley
PJM Interconnection

Yes
Yes
Yes
Yes
PJM supports the draft standard as it strikes a good balance between the industry and the NERC BOT November, 2013 resolutions. The standard provides the industry some flexibility regarding how communication protocols are developed. It also makes it cleaner and easier for operators to use the same protocol for all Operating Instructions, whether in an emergency or not, while not burdening System Operators with issues around how compliance will be measured. PJM does not support the addition of a new training requirement under R1. PJM recommends that all training requirements be included in one standard and not spread throughout families of standards. Consolidation of all training requirements under a single training standard will help in development of a clear, more organized training process.
Group
SPP Standards Review Group
Robert Rhodes
No
Our understanding of Recommendation 26 is that it deals strictly with communications during emergencies which COM-002-3 had already addressed. The addition of non-emergency communications, which are not mentioned in Recommendation 26 at all, has expanded the scope of the standard beyond that called for by the recommendation. The addition of non-emergency communications has added additional compliance burden for the responsible entities without clearly improving the reliability of the BES.
No
We suggest changing the Moderate VSLs for R5, R6 and R7 to Lower. If the failure to completely follow through with the protocols contained in R1 had no adverse impact on the situation, then this VSL is purely administrative and is not deserving of being Moderate. The Lower and Moderate VSLs for R1 contain specific details regarding each of the Parts referenced in each of the VSLs. In the High and Severe VSLs for R1 only reference is made to the Parts while the details contained in the Parts is not included in the VSLs. Either the details should be removed from the Lower and Moderate VSLs or the details need to be included in the High and Severe VSLs.
Yes

The removal of Reliability Directive from the definition of Operating Instruction has removed clarity from a compliance viewpoint. Without this clarity, which could also be provided by requiring a statement which identifies the Emergency situation as an Emergency, the operator does not know that he is in an Emergency situation. Although the operator's response may be the same as it is in a non-emergency, the compliance hook of zero tolerance is there. We need a mechanism in place that we can use to identify when we are in an Emergency situation which prevents Monday-morning quarterbacking during an audit regarding whether an Emergency actually occurred or not. Reliability Directive gave us that indication. We recommend requiring an Operating Instruction that is issued during an Emergency situation be identified as 'This is an Emergency.' Recommendation 26 calls for work to be done to improve the effectiveness of communications in emergency situations. The purpose of the standard is to improve communications. However, the focus of the standard is primarily 3-part communications. There is no supporting documentation or data to support the position that 3-part communications improves the effectiveness of communications. Focusing on 3-part communications provides an easy target from a compliance perspective but all it teaches us is to mechanically repeat back what we have been instructed to do. We're focusing on the 'how' and 'what' rather than the 'why'. Keeping the 'why' in mind improves communications and the reliability of the BES. Keeping the 'why' in mind also leads to improved situational awareness. Improving effective communications is difficult to quantify in a standard and even more difficult to measure. We may be better off focusing on the principles contained in the OC's Reliability Guideline System Operator Verbal Communications – Current Industry Practices. We suggest that R2 and R3 are already provided for in PER-005 and therefore are redundant in this standard. If there is a need to include a training requirement in this standard, that requirement could consist of a statement to include protocol training in the entity's reliability task list. Measure 4 adds an additional requirement regarding the failure to follow protocols which in turn leads to an Emergency. The Measure basically requires the responsible entity to assess those particular situations even though they are not specifically called out in the requirement. We recommend adding the following sentence at the end of R4.1: 'Such assessment shall include, at a minimum, any instance that is an Emergency.' We recommend that the drafting team consider moving R4 back to language similar to that contained in R5 of Posting 7. This language is much clearer and eliminates Paragraph 81 concerns of administrative burden associated with the required 12-month assessments and removes the ambiguity of 'corrective actions' and 'as appropriate'. In the last line of the Evidence Requested table in the R2 section of the RSAW, the following evidence is requested: '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.' This implies that an entity will be found non-compliant if operating personnel operate the Real-time BES prior to receiving training on issuing Operating Instructions. This is not what is stated in the requirement. This entry should be reworded to the following: '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 issuing Operating Instructions.' Similarly, this change

needs to be made in the Compliance Assessment Approach Specific to COM-002-4, R2 table. That entry should read: 'Verify applicable operating personnel, or a sample thereof, received the required training prior to the date they began issuing Operating Instructions by agreeing selected personnel names to training records.'

Group

Bureau of Reclamation

Erika Doot

Yes

Reclamation requests that R5 include a bullet requiring the issuer of an Operating Instruction during an Emergency to identify the situation as an Emergency. This is important because R6 requires recipients of Operating Instructions to repeat the instructions during Emergencies, but it may not be clear to the recipient that an Emergency is occurring. Reclamation reiterates that R1.3 and R3 should also allow the receiver of an Operating Instruction to respond by explaining that a requested action cannot be performed (e.g., due to safety, equipment, regulatory, or statutory requirements as described in TOP-001 R3 and IRO-001 R8). The requirement to either repeat or request that the instruction be reissued does not account for the realistic situation that an entity may not be able to perform an Operating Instruction. The drafting team could choose to address this point with a footnote explaining that the requirement to repeat the instruction does not obligate the recipient to perform the action if he repeats the instruction, but then explains that he cannot perform the action because doing so would violate safety, equipment, regulatory, or statutory requirements.

Individual

Brett Holland

Kansas City Power & Light

Agree

SPP - Robert Rhodes

Group

Dominion

Louis Slade

Agree

SERC OC Standards Review group

Group

Dominion

Louis Slade

No

We do not believe the proposed requirements and measures clearly delineate the differences in the actions required to be taken by the issuer and recipient depending upon whether or not the Operating Instruction is being given to alleviate or avoid an Emergency.

No

We do not agree that the blackout recommendation calls for the use of 3 part communication for every Operating Instruction and note that neither the NERC Board nor the SDT has provided any evidence that indicates a direct correlation between errors due to communication problems and events that adversely impacted the BES. Therefore we find it difficult to support reliability standard requirements that require 3 part communication for every Operating Instruction and enforce compliance with same.

No

We believe that the VRFs/VSLs should be modified to better reflect the stated intent of the NERC Board of Trustees November 19th, 2013 Resolution, which is to enforce 'zero tolerance' only for failure to use 3 part communications by the issuer or recipient of an Operating Instruction when it is issued to alleviate or avoid an Emergency.

Yes

The proposed standard still contains requirements that mandate the use of, and training to include, 3 part communications during issuance of all Operating Instructions, including those issued during non-Emergency situations. While Dominion agrees that the SDT has stated in its Rationale and Technical Justification document that the proposed measures and RSAW don't specifically require that auditors verify compliance of this for the requirements (and associated measures), a strict read leads us to a different conclusion. Under the RSAW for R1 it states that the entity shall provide its documented communications protocols developed for this requirement and the auditor shall review the documented communications protocols provided by entity and ensure they address the Parts of R1 (including the use of 3 part communications). The RSAW contains similar actions relative to R2 and R3 in that the entity is to provide evidence consisting of agendas, learning objectives, or course materials that it provides pursuant to these requirements. Given this, Dominion believes an auditor can enforce to a 'zero defect tolerance' if it chooses to do so and in fact would argue that an audit would be deficient if it failed to validate whether the learning objective included insuring that 3 part communication was used during issuance or receipt of each Operating Instruction. Dominion also finds there are not clear and concise differences between requirements 1, 5 and 6 resulting in uncertainty as to whether the Operating Instruction is being issued to alleviate or avoid an Emergency. Dominion is concerned that, absent a requirement that the issuer make a definitive statement as to whether an Operating Instruction is being issued to alleviate or avoid an Emergency, neither the recipient (during) nor an auditor (after) would be able to make such determination. Having said this, we could support the standard if it were revised in a fashion similar to that described below. 1. Modify requirement 1 so that it applies to all Operating Instructions but requires that those being issued to alleviate or avoid an Emergency be specifically identified as such and that the issuer explicitly request recipient confirm their understanding through use of 3 part

communication. 2. Remove requirements 5, 6 & 7 (incorporating specific items deemed necessary by the SDT as bullets or sub-requirements of R1). 3. Revise measures, VRFs/VSLs and RSAW so that strict compliance with use of 3 part communication is only applied when an Operating Instruction is issued to alleviate or avoid an Emergency as identified by the issuer at the time of issuance. 4. Measure M4 requires compliance demonstration beyond Requirement R4. Specifically, entities must provide evidence that appropriate corrective action was taken for 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..., Examples of suggested changes 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: [Violation Risk Factor: Low][Time Horizon: Long-term Planning] 1.1. Require that its operating personnel identify, at the time of issuance, when the Operating Instruction is being issued to alleviate or avoid an Emergency 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. • Request recipient use 3 part communication when the Operating Instruction is being issued to alleviate or avoid an Emergency 1.3 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. 1.4. 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. M1. Each Balancing Authority, Reliability Coordinator, and Transmission Operator shall provide its documented communications protocols developed for Requirement R1. For each Operating Instruction issued to alleviate or avoid an Emergency; entity shall provide evidence that it identified such at time Operating instruction was issued (R1.1) and requested recipient use of 3 part communication (R1.2). • VSL for R1 – modify Severe to include any instance where entity either (1) failed to identify, at the time of issuance, that the Operating Instruction is being issued to alleviate or avoid an Emergency or (2) failed to request recipient use 3 part communication when the Operating Instruction was issued to alleviate or avoid an Emergency

Group

ACES Standards Collaborators

Ben Engelby

No

(1) We disagree that the current draft addresses the NERC Board resolution because the Board charged the drafting team with developing an “essential set of communications protocols” for reliable operation of the BES. The proposed standard conflicts with other existing reliability standards, which would subject entities to double jeopardy. Therefore, the standard includes more than an “essential set” of requirements as stated in the NERC Board Resolution. (2) For example, the “nomenclature” protocol in Requirement R1 is duplicative with TOP-002 R18. Since FERC issued a NOPR proposing to remand the TOP standards, the requirement of using “uniform line identifiers” will remain as an enforceable standard. Having a nomenclature requirement in COM-002-4 will subject entities to double jeopardy and is not an “essential set of communication protocols.” (3) Another example of a redundant requirement is training. Communications that impact the BES will be covered in a reliability related task as part of the systematic approach to training. This will also subject entities to double jeopardy with PER-005 R1 and is not an “essential set of communication protocols.” (4) We appreciate the efforts of the drafting team in working to address the FERC directives and NERC November 2013 BOT Resolution, but we do not believe that COM-002-4 accurately reflects the proper applicability for entities that have an impact on the operations of the Bulk Electric System in normal and emergency conditions. We understand that the inclusion of Distribution Providers to this standard stems from various FERC directives, but because of the relationship of Distribution Providers with Transmission Operators as identified in NERC's functional model in being only a receiver of instructions to implement voltage reduction or to shed load to prevent the failure of the BES, or related to restoration activities as coordinated with the Transmission Operator; the TOP is ultimately responsible for the proper execution of the instructions. Thus, we continue to recommend that Distribution Providers be removed from the applicability of COM-002-4. (5) Knowing that it will be difficult to remove the Distribution Provider from the applicability of COM-002-4 per FERC's directives, we recommend an alternative that parallels the recently FERC approved CIP-003-5 applicability section 4.1.2, which we believe accurately captures those DPs that receive Operating Instructions associated with the reliability of the BES. The following alternative can be used as technical justification to clarify those Distribution Providers that have an impact on the BES is recommended: “4.1.2 Distribution Provider that: 4.1.2.1 Has capability to shed 300 MW or more of load in a single manually initiated operation. 4.1.2.2 Has switching obligations related to any Cranking Path and group of Elements meeting the initial switching requirements from a Blackstart Resource up to and including the first interconnection point of the starting station service of the next generation unit(s) to be started.”

No

(1) We believe recommendation number 26 of the 2003 Blackout Report continues to be misinterpreted. The recommendation is focused on how the ERO should communicate with governmental agencies. It states, “Standing hotline networks, or a functional equivalent, should be established for use in alerts and emergencies (as opposed to one-on-one phone calls) to ensure that all key parties, [including state and local officials] are able to give and

receive timely and accurate information.” The recommendation does not state anywhere to utilize three-part communication. COM-002-4 does not address the development of hotline networks or “upgrading communication system hardware where appropriate” for contacting governmental agencies, including state and local officials.

No

(1) We disagree with some of the requirements of including training and several aspects of the communication protocols. Since we disagree with the underlying requirements, we also disagree with the corresponding VSLs and VRFs.

Yes

(1) We disagree with training requirements as they are redundant with PER-005. Similar to a FERC directive, the drafting team should be able to provide the BOT with technical justification that other alternatives exist to developing a new requirement such as pointing to an existing requirement. Training is already included in the PER requirements. The drafting team should provide the feedback from industry and show that there is an already existing enforceable standard that covers this issue of training and there are no gaps in reliability. (2) We do not think the Distribution Provider should be an applicable function. Most Distribution Providers simply do not have a materially impact on BES reliability. We suggest an alternative to have the standard apply to those DP that may impact the BES. According to the FERC-approved CIP version 5 standards, a Distribution Provider is subject to the standards if the DP has UFLS/UVLS systems that have the capability of shedding 300 MW or more of load. We ask the drafting team to consider revising the applicability section to mirror the CIP standards. There was technical justification provided during the development of those standards, NERC and FERC both approved those standards, and therefore, a precedent exists for this reasonable approach to focusing on entities that pose an impact, however minimal, to the BES. (3) Many DPs have no practical way to demonstrate compliance with “repeat backs.” Many DPs do not have recording systems for the telephonic communications. This puts the DP in a position to request the voice recordings or attestations from the issuer. The issuer is not obligated to provide the data and, in fact, history has shown that many registered entities will not provide this type of data to a third party for fear of compliance issues being identified with the issuer. Thus, from a practical perspective the standard puts the DP in the position of having to use weak evidence to demonstrate compliance. This is an unreasonable burden on the DP. (4) We recommend that the drafting team remove references to “taking alternative actions.” This is ambiguous and could potentially tie in actions that should be taken in accordance to directives in IRO-001 and TOP-001. COM-002 is related only to communications, so taking alternative actions must be limited to alternative communications. (5) We suggest that the “assess adherence and assess effectiveness” language in R4 be removed from COM-002-4. This language is similar to the “Identify, Assess and Correct (IAC)” language that was included in the CIP V5 standards. The removal or modification of this language was included in the Final Rule on NERC CIP V5 Standards (Order No. 791). FERC stated that IAC language and concepts would be best addressed in the NERC compliance processes, such as through the NERC Reliability Assurance

Initiative (RAI), rather than standards requirements. (6) Thank you for the opportunity to comment.

Group

Tennessee Valley Authority

Brandy Spraker

Agree

SERC Operating Committee Review Team

Individual

Scott McGough

Georgia System Operations Corporation

Yes

No

GSOC recommends modifying R1 so that it applies to all Operating Instructions but requires that those being issued to alleviate or avoid an Emergency be specifically identified as such and that the issuer explicitly request recipient confirm understanding through use of 3 part communication. This would require a revised R1.1 Proposed R1: ADD: Require that its operating personnel identify, at the time of issuance, when the Operating Instruction is being issued to alleviate or avoid an Emergency. Proposed R1.2: ADD: Request recipient use 3 part communication when the Operating Instruction is being issued to alleviate or avoid an Emergency. Proposed R1.3: change the word "correct" to "understood" Requirement 2: GSOC believes R2 should be eliminated as redundant with the systematic approach to training requirements of PER-005-2(Operating Personnel Training) which are applicable to all Bas, RCs and TOPs. Communication protocols must be included in each company's specific reliability-related task list. GSOC believes the current proposal of COM-002-4 still contains ambiguities that can be resolved with the following alternative. GSOC recognizes the following alternative in that it parallels the recently FERC approved CIP-003-5. GSOC believes this alternative more accurately captures those DPs that receive Operating Instructions associated with the reliability of the BES. 4.1.2 Distribution Provider that: 4.1.2.1 Has capability to shed 300 MW or more of load in a single manually initiated operation. 4.1.2.2 Has switching obligations related to Any Cranking Path and group of Elements meeting the initial switching requirements from a Blackstart Resource up to and including the first interconnection point of the starting station service of the next generation unit(s) to be started.

No

R1 – GSOC requests that there not be applied a Severe VSL for normal everyday Operating Instructions.

Yes

With consideration that an Emergency may not be initially recognized by system operators for several minutes, GSOC requests Requirements R5 thru R7 include the word “recognized” precede the work “Emergency”. GSOC cites the newly effective EOP-004-2, R2 currently affords this consideration. It requires reporting “within 24 hours of recognition of meeting an event type threshold”. In addition, GSOC recommends R5 thru R7 replace the words “during an Emergency” with “addressing a recognized Emergency” so as to avoid confusion should there be Operating Instructions issued during an Emergency that may have nothing to do with an Emergency. GSOC suggests that the “assess adherence and assess effectiveness” language in R4 be removed from COM-002-4. This language is similar to the “Identify, Assess and Correct (IAC)” language that was included in the CIP V5 standards. The removal or modification of this language was included in the Final Rule on NERC CIP V5 Standards (Order No. 791). FERC stated that IAC language and concepts would be best addressed in the NERC compliance processes, such as through the NERC Reliability Assurance Initiative (RAI), rather than standards requirements

Individual

Cheryl Moseley

Electric Reliability Council of Texas, Inc.

No

This standard is not responsive to the Blackout Recommendation #26. The prevention of miscommunication is the current focus of this standard, while nothing in the Blackout Report commented on an instruction not being followed due to miscommunication. Rather, the Blackout Report focused on a lack of situational awareness based on one entity not understanding what the other entity was describing because different entities used different terminology. Flow of communications or “who” should be notified was also lacking in addition to “what” needed to be communicated. The report highlighted that effective communication was based on communication of important and prioritized information to each other in a timely way. In essence, this focuses on communication protocols to prevent miscommunications while Recommendation #26 focused on effective communication protocols that improve situational awareness, where the former is process and the latter is substantive. That being said, and regardless of whether COM-002-4 addresses the August 2003 Blackout Report Recommendation number 26 or not, ERCOT ISO can support the COM-002-4 standard. However, ERCOT ISO believes the draft standard could be improved and offers suggestions in Question 4 below, for the SDT’s consideration.

No

R2 and R3 VSLs should not have the “during an Emergency” distinction between a high and severe VSL. VSL’s grade the severity or “how bad” did an entity violate a requirement. The risk and situation of non-compliance is included in the VRF and not the VSL. ERCOT ISO would recommend percentage indicator across the severity levels as detailed in the VSL guideline document. R5-R7 VSLs should remove “Instability, uncontrolled separation, or cascading failures occurred as a result.” as that stipulation is not appropriate in the VSLs. The resulting

impact of non-compliance is addressed in the enforcement process and not in how severe an entity did not comply with a requirement. ERCOT ISO suggests a binary or severe only VSL to coincide with the VSL Guideline document. Additionally, ERCOT ISO would recommend adding “at least” in the R5 VSL to better clarify that a minimum of one of the three actions is required and not all three. The responsible entity that issued an Operating Instruction during an Emergency did not take ‘at least’ one of the following actions:

Yes

ERCOT ISO believes the draft standard could be improved and offers the following suggestions for the SDT’s consideration. Definition of Operating Instruction The definition of Operating Instruction could be improved by making the following changes: 1) Delete the word “interconnected” before BES in the first sentence. It is not used instances where BES is used. Unless there is a substantive reason for using interconnected in some BES references and not others, the standard should be consistent to mitigate ambiguity; 2) “Potential Options” in the parenthetical is redundant – delete “potential”. Also, “option” and “alternatives” in the parenthetical are also redundant – delete one of them; 3) The parenthetical doesn’t need to be a parenthetical – make it the last sentence in the definition. As revised, the definition would read as follows: Operating Instruction — A command by operating personnel responsible for the Real-time operation of the Bulk Electric System (BES) to change or preserve the state, status, output, or input of an Element of the BES or Facility of the BES. A discussion of general information to resolve BES operating concerns is not a command and is not considered an Operating Instruction. Purpose Section The purpose statement could be improved by making the following changes: 1) Delete “the issuance of” in the first sentence. It is inherent that a communication is “issued”. Therefore, this language is superfluous and should be deleted to mitigate any potential ambiguity; 2) Delete “predefined” in the first sentence. This adjective is not needed - the existence of communication protocols means they are predefined. Therefore, this is superfluous language and should be deleted to mitigate potential ambiguity. As revised, the purpose section would read as follows: Purpose: To improve communications for Operating Instructions with communications protocols to reduce the possibility of miscommunication that could lead to action or inaction harmful to the reliability of the Bulk Electric System (BES). Requirements Section R1 1) ERCOT ISO disagrees with changing “have” to “develop” in the first sentence. The point of this requirement is to have protocols that meet the minimum requirements. Obviously, in order to have the protocols an entity would need to develop them, but that is not the focus – as noted, having the protocols is the intent; 2) Change “and” to “or” in the following - “...for its operating personnel that issue or receive Operating Instructions...” The intent is to make the obligation to have protocols applicable to all operating personnel of the relevant functions. It may be that some functions only issue or only receive operating instructions. In those cases this requirement would not apply to those entities because the requirement is conjunctive – issue and receive. By making it disjunctive by using “or” the requirement applies to all circumstances – i.e. issue and receive or just issue or just receive; 3) The change suggested in (2) above should be made in R1.1 as well; 4) Also in R1.1, the triggering condition for using another language besides English - i.e. “unless otherwise agreed to” – is unclear in terms of how that would work. How do you demonstrate that such

an agreement is in place? Also, practically speaking, the ability to reach such an agreement assumes that all operators are capable of speaking the alternative language. It seems way too complicated because it would depend on the languages spoken by the different operators at different entities, and their schedules would have to be coordinated. These issues are less of a concern for allowing alternative languages for internal communications because the entity's personnel know one another and are located in the same place/organization. ERCOT ISO appreciates the intent of allowing for this exception, but it is difficult to see how it would work in practice, and even assuming it could work, the requirement is unclear as to what sort of agreement would be required; 5) R1.2 – Change “repeated information” to “response”. First, this change promotes consistency in terminology. Second, it is more consistent with the intent that the receiver is not required to repeat the directive verbatim – response contemplates flexibility as long as intent is there, while repeated information seems to require a verbatim reply; 6) The last bullet in R1.2 requires the issuer to take an alternative action if a response is not received or if the instruction is not understood. It is unclear what this means. Is the obligation related to trying to re-issue the instruction, or does it require the issuer take an alternative operating action? This is a communications standard, not an operations standard. Accordingly, the intent of this bullet should be clarified, and if it requires the issuer to take an alternative operating action, ERCOT ISO questions whether that obligation should be in a COM standard. Operational requirements are already covered in other standards, and if entities act under those other standards then the relevant communications protocols would apply to those “alternative” operating actions. ERCOT ISO believes that the “alternative action” described in the third bullet of R1.2 and R5 should be limited only to communications and not operating actions. ERCOT ISO would recommend replacing R1.2 and R5 third bullet with the following: Attempt an alternative means to communicate the Operating Instruction if a response is not received or if the Operating Instruction was not understood by the receiver, if deemed necessary by the issuer. ERCOT ISO also recommends including “or receiving” to capture that the training should be prior to that individual operator issuing ‘or receiving’ an Operating Instruction to address the subparts of R1 that deal with receiving Operating Instructions. 7) R1.4 – Delete “single-party”. It is clear that an issuer is one entity without having to add “single-party”. Accordingly, this is superfluous language and should be deleted to mitigate ambiguity. If this deletion is made, “operating instruction” would have to be moved to where “single-party” was in the sentence; 8) R1.4 requires the issuer to “confirm” or “verify” that the instruction was received by at least one entity. They are the same thing – delete one of them for clarity and to mitigate ambiguity; 9) R1.5 requires the communication protocols to specify the instances where time identification is required and to specify the format for time identification. As written, this appears to require the protocols to specifically list all relevant instances and, where relevant, requires the use of a specific time ID format. The SDT should consider revising this so the requirement imposes a general obligation for the protocols to time ID instructions when necessary, but not require the establishment of an exclusive list. This will accomplish the goal of time stamping and provide the entity with flexibility to implement the requirement, which will also mitigate the need to revise protocols if an entity determines prospectively that time ID is not needed in some instances on the list and is

needed in other instances that are not on the list. Similarly, the protocols should not require a specific format. Providing flexibility with respect to format will mitigate the potential for form over substance violations of the protocols – time ID is the point, not the format; 10) R1.6 requires the protocols to establish nomenclature for transmission elements. It is unclear how this will facilitate clearer communications unless all entities that are issuers or recipients of instructions use the same nomenclature. As drafted, it appears that it is an independent obligation that applies to each entity. If that is the case, each entity could use different nomenclature, which arguably could have a negative impact on communications. R4 1) ERCOT ISO understands the inclusion of R4 as a means to make normal operations Operating Instructions not subject to zero tolerance enforcement. However, ERCOT ISO has reservations concerning potential subjectivity surrounding who determines “appropriate” and “as necessary”. As a general comment, these types of “internal controls” requirements are better handled through the RAI initiative and subsequent CMEP processes. However, if the language remains, ERCOT ISO believes the clarity and effectiveness of the standard will benefit by clarifying that the entity who is conducting the assessments determine the appropriateness and necessity, and that the role of the ERO is simply to review if such activities were performed. ERCOT ISO recommends modifications as below. 4.1. Assess adherence by its operating personnel that issue or receive Operating Instructions to the documented communications protocols ‘required’ in ‘by the subparts’ of Requirement R1, , provide feedback to those operating personnel and take corrective action, as ‘deemed’ appropriate ‘by the entity’ to address deviations from the documented protocols. 4.2. Assess the effectiveness of its documented communications protocols ‘required’ in ‘by the subparts of’ Requirement R1, for its operating personnel that issue or receive Operating Instructions and modify its documented communication protocols, as ‘deemed’ necessary ‘by the entity’. Additionally, ERCOT ISO recommends including language to specify that R4 only be required to apply to those communication protocols that are identified in the subparts of R1, and not to other practices that an entity may choose to employ or improve upon. This clarification will mitigate creating a “fill in the blank” type standard approach for future potential changes to the R1 documented communication protocols. R5 1) How does the term “Emergency” in this requirement align with/relate to the term “Reliability Directive” in other standards, both in terms of meaning and scope of related responsibilities – is there overlap that could create ambiguity or unnecessary redundancy? There is a concern regarding the use of “Operating Instruction during an Emergency”. While ERCOT ISO understands the rationale behind replacing Reliability Directive with the new terminology based on the FERC NOPR potentially remanding the term, to avoid overlap/redundancy/confusion if this is retained, any potential conflicts must be addressed through other projects. Use of Reliability Directive up until this draft created clear synergy between COM-003/002 and the IRO/TOP revisions. If the term is not remanded, ERCOT ISO would support a more uniform approach by including Reliability Directive; 2) Change “repeated information” to “response” in first two bullets. See comment 5 in R1 comments above for rationale for this suggested change; 3) Third bullet – see comment 6 under R1 comments – same comment for the third bullet under R5; R7 1) Delete “single party” and delete either “confirm” or “verify” – see comments 7 and 8 under R1 for rationale for these suggested revisions. Measures M4 is too prescriptive and inappropriately

imposes requirements on the entity. This measure should align with previous comments concerning R4. M4 should be modified to reflect appropriate measures or types of evidence that should be provided without being overly prescriptive with respect to the level of quality of evidence. Additionally each part should be included and reflect the requirements without imposing additional requirements. M5-M7 should not identify attestations from the issuer or include “dated and time stamped” as part of the measure. Compliance should be demonstrated by the relevant entity – third parties should not be required either directly or indirectly to support the compliance activities of another entity by providing attestations. “Dated and time stamped” goes to the quality of evidence and is not appropriate for a measure. ERCOT ISO comments that inclusion of attestations, documented observations, procedures, or other equivalent evidence would improve M5-M7.

Individual

Michael Landry

DEMCO

Agree

NRECA

Group

ISO/RTO Council Standards Review Committee

Greg Campoli

No

We do not agree with the following VSLs: i) R4: The LOW VSL suggests that an entity is assigned a LOW VSL if assessments are conducted more than 12 months apart. There is no max or “cap” to the delayed assessment and hence an entity may be 18, 19 or more months late in conducting the next assessment. In other standards, this could well be assessed a MEDIUM or HIGH or even a SEVERE violation, depending on the time period that an entity failed the 12 month update requirement. Absent this “cap”, or staggered caps, the proposed HIGH and SEVERE VSLs can only be assessed based on whether or not there was ever an assessment, even the last assessment was done 3 or 4 years prior to an audit. This is inconsistent with the general guideline for VSLs. ii) R5: The MEDIUM VSL and SEVERE VSL are identical, except the latter has a condition that is associated with the impact of the violation. This is inconsistent with the intent of the VSL, which is to assess the “extent to which” the requirement was violated, not the impact of the violation which should be captured by the VRF. This is also inconsistent with the VSL principle and guideline. We suggest removing the MEDIUM VSL, and the condition under the proposed SEVERE VSL that: “AND Instability, uncontrolled separation, or cascading failures occurred as a result.” iii) R6: Same comments as in R5. iv) R7: Same comments as in R5.

Yes

1. R1.4. – [Documented communications protocols for its operating personnel that issue and receive Operating Instructions shall, at a minimum] 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. • Some ISO's issues multiple-party burst Operating Instruction to Generator Operators through electronic means Associated real-time requirement: 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. NOTE – ERCOT does not support the following Comment: The SRC members (excluding ERCOT) do not believe this requirement is necessary for reliability. Moreover, the Standard Drafting Team has not provided any, nor have we been made aware of the substantiated rationale for keeping this Requirement except that the SDT believes is it necessary.

2. R1.6. – [Documented communications protocols for its operating personnel that issue and receive Operating Instructions shall, at a minimum] Specify the nomenclature for Transmission interface Elements and Transmission interface Facilities when issuing an oral or written Operating Instruction. Comment: This Requirement is vague and needs to be clarified for Registered Entities to know how to comply with it; how would one "specify nomenclature" system-wide? Even though the posted "Rationale and Technical Justification" (RTJ) document notes that R1.6 is limited in scope to only Transmission interface Elements or Transmission interface Facilities (e.g. tie lines and tie substations), this RTJ document should define these terms and substantiate to what registered entities this needs to apply. For example, if the intent is to apply this requirement to Inter-Area tie-lines, then it should probably be limited to Reliability Coordinator-to-Reliability Coordinator communications. If the intent is to apply this requirement to every type of transmission – say generation interconnection facilities – it should be clear so that Registered Entities can clearly understand the burdens associated with this new Requirement.

3. R2. and R3. – ..."shall conduct initial training for each of its operating personnel ..." Note – ERCOT and IESO do not support the following Comment: The SRC members, (excluding ERCOT and IESO) do not believe a training Requirement is necessary; Responsible Entities must adhere to the Requirements of NERC Standards and how they accomplish this should not be dictated by a Standard Requirement. Additionally, to the extent that the SDT concludes that training on 3-part communication is necessary to ensure an adequate level of reliability, then any training requirements should this would already be covered under the PER Standard, which requiring training on job tasks. To the extent training requirements should be imposed on GOP/DP personnel, the PER Standard could be slightly modified to include them. Overall, if NERC is going to add additional training requirements, they should be located in PER to avoid complexity in the organization of NERC Standards. Finally, under RAI principles, NERC and Regions can determine what type of monitoring is appropriate of Responsible Entities' compliance with the new COM Standard based on the quality of their Training programs. This would further support reliability by changing the requirement from a one-time audit (i.e., initial training) to an ongoing assessment. In conclusion, even though the BOT resolved that there should be training associated with the COM requirements, it would be beneficial to

address the BOT's concern through existing Standards (PER). Basic principles of drafting regulation should strive to avoid making the organization and relationship among NERC Standards more complex than need to be. 4. Measurement 6. Measurement 6 needs to be revised so that it is consistent with NERC Enforcement policies. Specifically, the last sentence needs to be rewritten so that "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 and transcripts." NERC has repeatedly affirmed that a Registered Entity may provide an attestation that it has complied with a Standard. See NERC Compliance Process Bulletin#2011-001 ("Data Retention Requirements") (May 20, 2011), at p 3 (in the context of explaining that the CMEP requires a registered entity to demonstrate that it was compliant through the entire audit period, NERC stated that some examples of evidence may include "An attestation of any employee who has participated in the activity on a regular basis throughout the audit period, supported by other corroborating evidence (such as schedules, emails and other applicable documentation). Recipients of oral Operating Instructions during an Emergency have ample means of maintaining records, providing corroborating material, etc... demonstrating that they adhered to the emergency Operating Instruction. To establish an expectation that other Registered Entities may be maintaining audit evidence for the Registered Entity to which the Requirement applies is inconsistent with NERC's enforcement rules and establishes a flawed practice and expectation with regard to recordkeeping requirements and "audit trails."

Individual

Scott Berry

Indiana Municipal Power Agency

Yes

Requirement R3 is not clear in defining if it covers all Operating Instructions received by a Distribution Provider and Generator Operator. Distribution Providers and Generator Operators can receive Operating Instructions from outside parties (Balancing Authority, Reliability Coordinator, and Transmission Operator) and from internal parties (its own Market Operations). The current word in Requirement 3 requires Distribution Providers and Generator Operators to repeat back both outside and internal parties Operating Instructions. IMPA does not believe this was the intent of the SDT since there are no requirements that cover Distribution Providers or Generator Operators issuing Operating Instructions (the Generator Operator's Market Operations issuing an Operating Instruction to its generating power plant; Generator Operators cannot issue Operating Instructions to any Registered Entities such as the Balancing Authority or Reliability Coordinator). IMPA also believes that operating personnel need to know at the time an instruction is given if it is an Operating Instruction or a Directive. This clarification needs to come from the entity giving the

instruction and reviewing the call afterwards to make that determination is very problematic.
Individual
Gregory Campoli
New York Independent System Operator
Yes
The NYISO would like to request confirmation that Operating Instructions are limited to verbal or written communications and that electronic dispatch signals are not in scope for this standard. The NYISO would also note that we support comments submitted by both the IRC/SRC and NPCC/RSC.
Individual
Bill Temple
Northeast Utilities
Yes
Comment 1 Systematic Approach to Training is already covered in PER-005-1 and including a requirement for training would seem to be redundant. Comment 2 The applicability of Distribution Provider (DP) functional responsibility presents potential for confusion. New England LCC's (Transmission Operators) operate at the direction of ISO-NE the Regional Transmission Operator (RTO) and enforcing the communication protocols to distribution companies/distribution providers may present challenges, identifying, documenting and implementing COM-002-4 to the DP. Comment 3 The language used in Requirement 1.6 is vague and needs to be clarified for Registered Entities to know how to comply with it. How would one "specify nomenclature" system-wide?
Individual
Jen Fiegel
Oncor Electric Delivery Company LLC
No

The Operating Instruction during an Emergency is unclear, vague, and subject to interpretation. By using the NERC defined term of Emergency, certain tasks that are a non-emergency action would now be considered an Emergency. Oncor supports GTC's recommendation of the removal of the terms "or limit" within this definition. One could argue that every single Operating Instruction is utilized to limit failures of transmission facilities. Emergency should be more appropriately defined without this ambiguity. We submit, for the SDT's consideration, a revised definition of Emergency in an attempt to remove this ambiguity. Emergency – Any abnormal system condition that requires automatic or immediate manual action to prevent the failure of transmission facilities or generation supply that would adversely affect the reliability of the Bulk Electric System. Oncor does not believe that COM-002-4 accurately reflects the proper applicability for entities that have an impact on the operations of the Bulk Electric System in normal and emergency conditions. Oncor understands that the inclusion of Distribution Providers to this standard stems from various FERC directives, but because of the relationship of Distribution Providers with Transmission Operators as identified in NERC's functional model in being only a receiver of instructions to implement voltage reduction or to shed load to prevent the failure of the BES, or related to restoration activities as coordinated with the Transmission Operator; the TOP is ultimately responsible for the proper execution of the instructions, continues to recommend that Distribution Providers be removed from the applicability of COM-002-4. Knowing that it will be difficult to remove the Distribution Provider from the applicability of COM-002-4 per FERC's directives, Oncor supports the alternatives recommended by GTC as an opportunity to address this. In addition, the COM-002-4 does not align with the evaluation and findings of the NERC Reliability Issues Steering Committee (RISC) and Operating Committee (OC) which supports the importance of clear communications but found no evidence that non-emergency communications represent a reliability gap.

No

COM-002-4 goes beyond the August 2003 Blackout Report Recommendation number 26, FERC Order 693 for neither identify requirements for normal operations. EOP-001-2, R3.1 and COM-002-2, R2 already address the requirements of the Blackout Report and FERC Order 693. The intent of the 2003 Blackout recommendation was to provide tighter communication during emergency situations. Due to the ambiguity that exists between Operating Instruction and Operating Instruction during an Emergency, we believe that this recommendation was not addressed. In addition, the NERC BOT directed the NERC Operating Committee (OC) to evaluate the COM standards (previously COM-003) and responses from the Reliability Issues Steering Committee (RISC), the Independent Experts Review and NERC Management. Their report issued September 23, 2013 to the NERC BOT Chairman identifies the importance of clear communications but found no evidence including the NERC event analysis process nor recent events which supports that non-emergency communications represents a reliability gap. The OC created a guideline for verbal communications which provides industry best practices and recommended utilizing the guideline to promote continuous improvement versus implementing a mandatory standard.

Yes

Yes

Oncor recommends Requirement 4 and Measurement 4 be removed. The “assess adherence and assess effectiveness” language mirrors the same concepts as the “Identify, Assess and Correct (IAC)” language that was included in the CIP V5 standards which FERC directed the removal of. The removal or modification of this language was included in the Final Rule of NERC CIP V5 (Order No. 791). FERC stated that IAC language was “overly-vague, lacking definition and guidance is needed” and that these control concepts would be best addressed in the NERC compliance processes, such as through the NERC Reliability Assurance Initiative (RAI), rather than standards requirements. Reliability Standards must be revised to focus on strategic and critical reliability objectives incorporating requirements for meeting and sustaining reliability of the BES. The current state of Standards must transition from a prescriptive zero tolerance approach to results-based requirements which assure the reliability and security of the critical infrastructure. A reliability results-based approach should not be an additive to the Reliability Standards; hence, controls requirements should not be incorporated within the Standards, rather controls should be considered at the Program level. Reliability Standards should define the results (“what”) Entities are mandated to meet and maintain and the “how” should be handled by each Entity for there is not a “one size fits all”. Incorporating detective controls as requirements and prescriptive measurements can lead to unintended consequences and again, an additive versus a process that helps provide a registered entity with reasonable assurance they comply with the Standard(s) or the operating function(s) and processes that the Standard(s) require. Rewording of R1.6 as follows: “Specify the nomenclature to be used for Transmission interface Elements and Transmission interface Facilities when issuing an oral or written Operating Instruction to Neighboring Entities.” While the Technical Justification document suggests that R1.6 applies to communication with neighboring entities, it is unclear that this requirement, as worded in the current draft of COM-002-4, is specifically discussing communication with neighboring entities. M2 should include “initial training” and be reworded as follows in order to maintain consistency with the requirement: “Each Balancing Authority, Reliability Coordinator, and Transmission Operator shall provide initial 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.”

Individual

Maggy Powell

Exelon Corp and its affiliated business units

No

Revision 8 addresses the Board Resolution, but it goes beyond the resolution by including GOP’s and DP’s as applicable entities thereby creating redundant and unnecessary compliance obligations for many of those entities. See comments below in response #4. Furthermore, while the new approach in this draft is an improvement, it does not achieve the desired goal to move away from a zero tolerance focus on the use of three part

communication within this standard. If time is allowed for further work on this standard, we offer potential adjustments below in response #4. A couple points of potential confusion: - Question 1 and the link to the Board Resolution on the Project page cites a November 19, 2013 Resolution; however, the link takes readers to a November 7, 2013 Resolution. We assume the November 7, 2013 Resolution is the correct reference. - The first bullet of the November 7, 2013 Board Resolution refers to the Operating Committee Guidelines for good communication practice. This OC document does not appear to be linked to the Project page. It is unlikely that many stakeholders would have found and/or reviewed the document relative to the proposed COM-002-4 draft.

No

2003 Blackout Report Recommendation No. 26 reads: "Tighten communications protocols, especially for communications during alerts and emergencies. Upgrade communication system hardware where appropriate (footnote omitted). NERC should work with reliability coordinators and control area operators to improve the effectiveness of internal and external communications during alerts, emergencies, or other critical situations, and ensure that all key parties, including state and local officials, receive timely and accurate information. NERC should task the regional councils to work together to develop communications protocols by December 31, 2004, and to assess and report on the adequacy of emergency communications systems within their regions against the protocols by that date." While Exelon believes that COM-002-4 goes beyond the Recommendation and includes the requirement to implement communication protocols for operating BES elements in non-emergency and other non-critical situations, Exelon also recognizes that the NERC Board believes that the words "especially for" in the recommendation are the reason to include a standard for normal communications. We also understand that in paragraph 540 of Order No. 693, FERC directed the ERO to expand the applicability of the communication standard to distribution providers (DP's) but that directive tied back to communications protocols "especially for communications during alerts and emergencies." Although Recommendation 26 addresses "key parties" and FERC directive addresses DP's in the context of Blackout Recommendation No. 26, we don't believe that either was intended to include DP's and GOP's for non-emergency /Operating Instructions communications.

Yes

- A "qualified" application of COM-002-4 for a DP that performs voltage reduction or load shedding as directed by an RC, BA or TOP could clarify the standard and place the emphasis on the functional entities that matter most.
- Remove R6 and M6. The BA, RC or TOP, as issuers, record Operating Instructions (OI). R1.2 requires an entity issuing an OI to confirm the receiver's response, reissue if necessary and take alternate action if the receiver does not confirm or understand the OI. Similarly, per R5, issuers of an OI are required to confirm the receiver's response, reissue if necessary and take alternate action if the receiver does not confirm or understand the OI. There is little reliability benefit in requiring the DP and GOP receiver documenting their role in this exchange. The training requirement for receivers of OI's in R3 is sufficient.
- If R6 and M6 are not removed. R6. To clarify, suggest that the word

“Operating Instruction” be inserted after “excluding written” so it is clear it is applicable to both conditions. M6. Need a comma after “voice recordings” so as to separate it from dated operator logs. "Voice recordings" is repeated twice in M6. M7. "Voice recordings" is repeated twice in M7. • R6 / M6. Exelon is concerned that demonstrating compliance with R6 may prove difficult for some entities. A generator operator may not have voice recording available at the entity’s facility and it may not be possible to procure voice recording or attestations from the issuer of an Operating Instruction. The measurement says dated operator logs are acceptable evidence. The RSAW further discusses auditor discretion and risk assessment respecting this requirement and measure. If audited per the measurement and RSAW guidance, log entries would be acceptable evidence but we are concerned that an auditor may find otherwise. • Should this proposal fail to pass ballot, we encourage the drafting team to build on the positive work done in this version and address the compliance concerns that remain. All stakeholders would be best served if this standard could incent improvement in communication through effective self-assessment and applied lessons learned. This iteration presents an opportunity to truly step away from placing the compliance burden that judges operators for their use of three-part communication and to focus on programmatic measures to promote effective communication. Specifically, replacing R5, R6 and R7 with meaningful assessment criteria to include in entity review programs could increase the qualitative components of the program, focus on efforts to improve effective communication and remove the zero tolerance compliance approach that currently exists. • While it’s been difficult to keep “starting over” with new standard language approaches, we believe that this version sets solid groundwork to address the hurdles and conflicts of previous approaches. Should more time be allowed to continue development of this most recent proposal, we would welcome the chance to discuss our ideas further.

Individual

Alice Ireland

Xcel Energy

Yes

Xcel Energy is voting negative because the standard no longer contains clarity for all parties on when they have entered an emergency state and therefore 3-part communication would be required. Since the requirements to conduct 3-part communication on emergency operating instructions will remain zero tolerance, it is important that the line of when the entity entered an emergency state be clear to the registered entities involved as well as ERO compliance and enforcement personnel. We think incorporating some of the mechanics from COM-002-3 could easily remedy our concerns. Alternatively, please consider requiring an Operating Instruction that is issued during an Emergency situation be identified as ‘This is an Emergency.’.

Individual
RoLynda Shumpert
South Carolina Electric and Gas
Agree
SERC OC
Group
Bonneville Power Administration
Jamison Dye
Yes
Yes
Yes
No
Individual
Anthony Jablonski
ReliabilityFirst
No
ReliabilityFirst submits the following comments related to the VSL for the SDTs consideration: 1. Requirement R4 VSL - For the Lower VSL, ReliabilityFirst recommends gradating the number of months an entity is late in assessing adherence and effectiveness of the documented communications protocols. For example, there is a big difference if an entity is late by one month or 12 months. As drafted, there is a big difference if an entity is late by one month or 12 months. As drafted, an entity that is late by 12 months would still fall under the Lower VSL. ReliabilityFirst recommends gradating the VSLs in three month intervals. For example, the last "AND" text for the Lower VSL would read: "The responsible entity exceeded twelve (12) but less than or equal to fifteen (15) calendar months between assessments." The Moderate VSL would read; "The responsible entity exceeded fifteen (15) but less than or equal to eighteen (18) calendar months between assessments." The High and Severe VSLs would follow the same rationale. 2. Requirement R5 VSL - Requirement R5 does not speak to instability, uncontrolled, separation, or cascading failures occurring as a result of correctly issuing an oral two-party, person-to-person Operating Instruction. To be consistent with the requirement, ReliabilityFirst recommends deleting the text after the AND qualifier and deleting the Moderate VSL. Hence, there will

only be one Severe VSL for this requirement. 3. Requirement R6 VSL - Similar comment as the Requirement R5 VSL 4. Requirement R7 VSL - Similar comment as the Requirement R5 VSL

Yes

ReliabilityFirst submits the following comments for consideration: 1. Requirements R1, R2, R3 and R4 - The term “operating personnel” is used throughout the draft standard. This term is undefined and it is unclear to which individuals the communications protocol applies. ReliabilityFirst recommends defining this term to eliminate any confusion and remove any questions around who encompasses “operating personnel”. ReliabilityFirst suggests replacing the term “operating personnel” with the draft PER-005-2 definition of “System Operator” (e.g., “An individual at a Control Center of a Balancing Authority, Transmission Operator, or Reliability Coordinator, who operates or directs the operation of the Bulk Electric System in Real-time.”). ReliabilityFirst believes it is the intent of the standard to apply to individuals who operate or direct the operation of the Bulk Electric System in Real-time, and not personnel that may be involved in supporting roles. 2. Requirement R4 a. The intent of Requirement R4 a. R4.1 appears to limit possible violations for deviations to the context of emergency operations, while only requiring that Responsible Entities to assess and correct deviations “as appropriate” in the non-Emergency setting. ReliabilityFirst is concerned that the qualifier “as appropriate” is vague and creates concerns similar to those expressed by the Commission in Order 791. In Order 791, the Commission supported the RAI’s goal to develop a framework for the ERO Enterprise’s use of discretion in the compliance monitoring and enforcement space, but rejected the codification of “identify, assess, and correct” language within the CIP Version 5 Reliability Standards because it is vague. ReliabilityFirst is also concerned that the qualifier “as appropriate” codifies discretion within COM-002-4. ReliabilityFirst believes that neither discretion nor controls should be codified in Reliability Standards. Rather, the ERO Enterprise should utilize discretion in the compliance monitoring and enforcement space when determining the relevant scope of audits and whether to decline to pursue a noncompliance as a violation. With the RAI, the ERO Enterprise is developing a singular and uniform framework to inform the ERO Enterprise’s use of discretion in the compliance monitoring and enforcement space. Therefore, ReliabilityFirst recommends removing the qualifier “as appropriate” from R4.1 and allowing the ongoing RAI effort to create a meaningful and unambiguous framework that the ERO Enterprise will utilize to inform its use of discretion in the compliance monitoring and enforcement of all Reliability Standards. ReliabilityFirst cautions that codifying discretion in some Reliability Standards may create confusion once the ERO Enterprise begins to implement RAI discretion in its compliance monitoring and enforcement work. For example, there may be confusion of whether discretion codified in certain Requirements of Reliability Standards precludes the ERO Enterprise’s use of RAI discretion for those Requirements where discretion is not codified. b. Flowing from 2.a. above, ReliabilityFirst recommends that Measure 4 be modified to remove discretion, and should read as follows: 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 also provide evidence that it took appropriate corrective actions as part of its assessment for all instances of operating personnel's nonadherence to the protocols developed in Requirement R1.

Individual

Richard Vine

California ISO

Yes

1. Requirement R4 is an administrative task, not a reliability-related task. The ISO does not see the value added or where BES reliability is enhanced by R4. 2. The ISO uses an Automated Dispatch System (ADS) to direct dispatch levels of generation in the ISO Balancing Authority Area. Though different ADS instructions are sent to multiple parties (different Generators) each individual instruction is an electronic communication that is "resource specific" (i.e. – we send one resource an electronic communication to position its unit at a specific level and another resource a different electronic communication to position its resource at a different level, etc.) In this respect the ISO considers the ADS to be a "single-party to single-party" communication rather than a "single-party to multiple-party burst" communication. The ISO requests standards drafting team confirmation that it does not interpret R1.4 (or R7 which contains similar language in the Emergency context) to apply to resource-specific ADS dispatch instructions.

Individual

Sergio Banuelos

Tri-State Generation and Transmission Association Inc.

Yes

Yes

Yes

Yes

Tri-State G&T disagrees with removing the term reliability directive. The proposed definition for Reliability Directive should be modified to provide technical justification, as requested in the November 21, 2013 FERC NOPR, and require Reliability Coordinators to use Reliability Directives to issue instructions to maintain reliable operations. As addressed in the NOPR, Reliability Directives from an entity responsible for the reliable operation of the BES should be mandatory at all times, not just during emergencies. Owners, Operators and others

responsible for reliability of the BES have used the term reliability directive effectively for many years. Removing this term does not enhance the reliability of the BES and places a burden on industry to adjust to accommodate a new method to accomplish what is done today with reliability directives. Our proposal is to make Reliability Directives applicable to RC, TOP and BA's to ensure reliable operation the BES. The term Operating Instructions should be applicable to Operators who issue commands to control elements essential to the reliable operation of the BES. We do not believe the term, as currently defined, should apply to Reliability Coordinators. According to the NERC Functional Model, Reliability Coordinators are not real time operators and are not operating personnel. Reliability Coordinators oversee the reliability of the BES and direct real time operations as needed to assure reliability of the BES. TSGT requests clarification of the term operating personnel, which positions is this term referring to? As previously stated, if operating personnel are the personnel that operate BES elements, then operating personnel should not include Reliability Coordinators since that is not the role they currently provide. TSGT requests clarification on the proposed multiple-party burst communication. This method of communication is not widely used and we are concerned that the use of this type of communication may create additional reliability issues. TSGT requests a clarification of time identification in R1.5.

Group

Luminant

Brenda Hampton

Yes

No

Recoomendation 26 of the August 2003 Blackout Report was to "Tighten communications protocols, especially for communications during alerts and emergencies. Upgrade communication system hardware where appropriate." Technology is now available and already in use in some places that allow receiptants of an All-Call/Burst Message type Operating Instruction to press a button on the phone keypad to acknowledge understanding of the Operating Instruction. This allows the issuer a quick and easy way to confirm the understanding of all recieptants of the Operating Instruction. Allowing the issuer of an Operating Instruction to seek confirmation from only one recipient in R7 ignores the recommendation from the Black Out Report to use new technology.

Yes

Yes

1). R1.3 and R3 should also allow the receiver of an Operating Instruction to respond by explaining that a requested action cannot be performed (e.g., due to safety, equipment, regulatory, or statutory requirements as described in TOP-001 R3 and IRO-001 R8). The requirement to either repeat or request that the instruction be reissued does not account for the realistic situation that an entity may not be able to perform an Operating Instruction. 2).

Specific to R.6, consideration should be given to revise the verbiage from, “during an Emergency” to “identified by the sender as constituting an Emergency directive.” The rationale for the recommendation is offered to provide clarity to the Requirement, as it is anticipated that there will be cases when it is not clear the Operating Instruction is associated with an Emergency. Additionally, the definition of “Emergency” in the NERC Glossary is broad and consequently it may be difficult, at times, to determine which inputs are subject to COM-002-4 requirements, especially if the TO or TOP calls a plant operator directly rather than going through the respective dispatchers. Note: On the 1/17/14 COM-002-4 SDT webinar the question was asked, how a DP or GOP would know that an Operating Instruction occurred during an Emergency. The drafting team stated that after every Operating Instruction the DP should call its TOP to determine if the Operating Instruction occurred during an Emergency. Luminant once again reiterates that it would be more efficient and the industry would benefit as a whole, if the sender of the Operational Instruction, states the instruction is associated with an Emergency.

Group

Santee Cooper

S. Tom Abrams

Agree

We agree with the comments submitted by SERC.

Individual

Ralph Meyer

The Empire District Electric Company

Yes

Yes

Yes

Yes

I feel that the requirement to an assessment to communication protocols is somewhat excessive and should be left as a part of the audit process or following NERCs RAI directive be left up to the internal compliance department of the company rather than having this as a requirement in the standard.

Individual

daniel mason

HHWP

no comment

no comment
no comment
Yes
I appreciate the work done on this Standard by the SDT. The current version of the draft is much improved. I propose one change before supporting this proposed standard. That change is in Requirement 4 where I believe the standard would be improved by replacing the "at least once every twelve (12) calendar months" language with "at least annually, with no more than X months between reviews." Such a change to the language of Requirement 4 would allow each entity to determine the best cycle for its review of adherence to and effectiveness of its communications protocols per CAN-0010. If that language is used, I believe that 15 months is an appropriate value for 'X'.

Additional comments received from Marcus Pelt, Southern Company

Definition of Emergency

Southern does not agree with replacing Reliability Directive with Emergency as it is currently used in Draft 8. In the NERC Glossary, the term Emergency is defined as follows:

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.

This definition is very broad and, if read literally, every breaker operation on the system would be considered an Emergency. This causes a great deal of concern. If this is the case and absent any compliance guidance to state otherwise, it would require Operating Entities to add additional staff to listen to all voice recordings to review adherence to the strict 100% compliance requirement for communications issued/received during Emergencies. These requirements/measures create an undue burden for Operating Entities and would likely not garner support from the industry.

We suggest that the SDT modify this approach to scope down actions that could be considered "Emergencies" by allowing entities to define and make it very clear that the expectation is not for Operating Entities to have to review all voice recordings (could be millions in a single year) to ensure compliance, but only a representative sample of voice recordings for both non-emergency and emergency communications.

From a DP and GOP standpoint, the RSAW and technical justification wording states that an attestation that no emergency had been called requiring a three part response would suffice for evidence. The rationale and technical justification document has some very good

explanations of the INTENT of the drafting team and how they want the industry to view the standard requirements. If the standard and the subsequent audits adhered ONLY to what was in the justification document, then there should be little or no concerns. Unfortunately, the justification document carries no statutory weight and the standard as written does.