

**Individual or group. (80 Responses)**

**Name (50 Responses)**

**Organization (50 Responses)**

**Group Name (30 Responses)**

**Lead Contact (30 Responses)**

**IF YOU WISH TO EXPRESS SUPPORT FOR ANOTHER ENTITY'S COMMENTS WITHOUT ENTERING ANY ADDITIONAL COMMENTS, YOU MAY DO SO HERE. (13 Responses)**

**Comments (80 Responses)**

**Question 1 (63 Responses)**

**Question 1 Comments (67 Responses)**

**Question 2 (44 Responses)**

**Question 2 Comments (67 Responses)**

Individual
Tammy Porter
Oncor Electric Delivery
No
Draft 6 of COM-003-1 appears to go beyond the recommendations and FERC 693 directives which were the basis for the SAR. The main objective to develop an operating protocol in alignment with other communications standards to improve reliability. Oncor's concerns with Draft 6 are: (1) R1 - subject to the Reliability Coordinator's approval: adding this to R1 potentially adds an administrative burden to an Entity/Industry without clear reliability benefits. Operating protocol should support an Entity's operations and functions which are not a "one size fits all". By requiring a RC's approval, the requirement empowers the RC to interpret the requirement (as well as defining "Operating Instructions") which may not be consistent with an Entity as well as the Regional Entity who will be enforcing the requirement. (2) R2/R3 - there is the potential for multiple levels of interpretation of these requirements; these requirement potentially creates a situation in which Operators will need to be able to assess the transition from normal to emergency operations and could quite impact efficiency and productivity of operations which is the opposite of the objective. In addition based on M2 & M3, Oncor has concerns with the administrative burden versus the reliability benefits gained in proving a negative condition.
No
R2 – it is unclear how a "failure" of using an operating protocol results in a reliability directive therefore the VSL indicates a zero tolerance level of performance which does not align to reliability based performance. R3 – not all failures of using three-part communication will automatically led to a Reliability Directive so the VSL should be designed to support more than a failure to use the protocols by the issuer of an Operating Instruction does not result
Individual
Scott McGough

Georgia System Operations
Yes
No
No, regarding R2 and R3, GSOC recommends to revise the wording as follows. In particular, we believe it advantageous to use NERC's definition of Emergency (BES Emergency) to provide entities escalating levels of severity as opposed to the single VSL - severe that appears in the current Draft 6. R2 - Each Balancing Authority, Reliability Coordinator, and Transmission Operator (R3 - Each Balancing Authority, Transmission Operator, Generator Operator and Distribution Provider) shall implement its communication protocols developed in Requirement R1 so that the failure to use the protocols by the issuer of an Operating Instruction does not result in any of the following: <ul style="list-style-type: none"> <li>• 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.</li> <li>• The failure of transmission facilities or generation supply that could adversely affect the reliability of the Bulk Electric System and automatic or immediate manual action to limit the failure was required.</li> <li>• An Adverse Reliability Impact</li> </ul>
Group
Northeast Power Coordinating Council
Guy Zito
No
The introduction of the condition in R2 “so that the failure to use the protocols by the issuer of an Operating Instruction does not result in an operating condition that requires the issuance of a Reliability Directive by the original issuer of the Operating Instruction or by another Balancing Authority, Reliability Coordinator, or Transmission Operator.” creates a number of issues with the standard. <p>a. The issuance of a Reliability Directive may be caused by a number of reasons, for example, the operating instruction (repeated or otherwise) may not be sufficient to address a potential condition that has an Adverse Reliability Impact; b. The operating instruction that is communicated, with or without adhering to the protocols developed in R1, is in fact moving other system conditions from a reliable state to one that has a potential of having Adverse Reliability Impact, for which a Reliability Directive needs to be issued after implementing the communicated operating instruction. c. The operating personnel may second guess whether or not a Reliability Directive will be issued if the established communication protocols are not implemented (such as by requiring 3-part communication) before it takes the required action. This puts the need to comply with a requirement into a condition assessment mode, which defeats the purpose of having a reliability standard to manage risk and meet performance expectation whose reliability outcome are predetermined, not on the fly. d. The added condition is a compliance assessment element with which to gauge violation severity or sanction; itself not a requirement. By introducing this to the requirement, it convolutes the</p>

requirement, adds nothing to meeting the reliability objectives, and may in fact jeopardize reliability. And what if a Reliability Directive was not issued despite the failure of Responsible Entity to implement its communication protocol? Is the Responsible Entity deemed compliant with the requirement? If so, do Requirements R2 and R3 drive the right behaviors? If not, then what's the value and influence of the added condition in the assessment outcome?

Requirement R1 clearly requires the responsible entity to develop documented communication protocols for the issuance of Operating Instructions. By Part 1.5, the instances where the issuer of an oral two party, person-to-person Operating Instruction requiring the receiver to repeat, restate, rephrase, or recapitulate the Operating Instruction and subsequent actions by the issuer are already clearly stipulated in the documented communication protocols. Responsible entities simply need to implement the protocols as documented, regardless of whether failure to do so would result in having to issue a Reliability Directive, or any other possible outcomes, for that matter. Similar comments apply to Requirement R3 when the responsible entities are required to close out the last part of the 3-part communication. The suggested rephrasing of the Purpose statement "To strengthen communications..." could be misleading. Communications could be strengthened with better equipment as well, but the intent of COM-003 is to deal only with communications protocols. Suggest changing the language to that which is found in the technical guidance document, "Enhance the effectiveness of communications..."

No

We agree with the VRFs, but not the VSLs because of the concerns with Requirements R2 and R3. We do not agree with the Long-term Planning Time Horizon for R1. Developing and documenting communication protocols for use during real-time operations is an operational planning process (or mid-term planning, at most), not a long-term planning process. We suggest to change the Time Horizon to Operations Planning. Regarding the Implementation Plan, it conflicts with Ontario regulatory practice with regards to the effective date of the standard. It is suggested that this conflict be removed by appending to the effective date wording, after "applicable regulatory approval" in the Effective Dates Section of the Implementation Plan: ", or, in those jurisdictions as otherwise made effective pursuant to the laws applicable to such ERO governmental authorities."

Individual

Bill Fowler

City of Tallahassee

No

TAL has voted NO because the standard is still not "clear and unambiguous". TAL is concerned at the degree to which the proposed standard complicates compliance for Operating Instructions without benefit to reliability. The FERC Directive was to tighten communications during Emergencies and Alerts. Operating Instructions deserve separate consideration under the standards. Requiring an entity's procedure to be subject to the Reliability Coordinator's approval creates an undue burden on the RC with no measurable improvement in reliability. While this addressed a commenter's concerns over uniformity within RC control areas, it would

be simpler and more efficient to have the RC create a procedure and provide it to all the entities in the footprint. Measure 3 should be changed to “when required by the issuer” in order to provide clarity and consistency with R3.

Individual

Nazra Gladu

Manitoba Hydro

Yes

Although Manitoba Hydro is in general support of the proposed draft, we suggest the following: (1) For clarity, consider rewriting the second paragraph of the definition of Operating Instruction as follows, An Operating Instruction is not: (1) A discussion of general information and of potential options or alternatives to resolve Bulk Electric System operating concerns (2) Exclusive and distinct from a Reliability Directive. There is no overlap between an Operating Instruction and Reliability Directive. (2) R1 and M1 - for consistency, add an “s” to the second instance of “Reliability Coordinator” as follows: “Each Balancing Authority, Reliability Coordinator, and Transmission Operator, in each Reliability Coordinator’s area, shall...” (3) R1 – the requirement instructs each BA, RC and TO develop separate communication protocols. Are these duplicative efforts practical? (4) R1, 1.4 – alpha-numeric clarifiers are limited to oral Operating Instructions only. For consistency with R1.1, 1.2 and 1.3, consider adding applicability to written Operating Instructions as well. (5) R1, 1.5 – is limited to oral Operating Instructions while R3 (which deals with the same situation) does not specify whether it is oral or written or both. (6) M2 – the measure does not seem to match the requirement. The requirement R2 states that the responsible entity implement its communication protocols so that there is no failure to use the protocols which results in a certain operating condition. The measure however requires that the responsible entity provide evidence that they did not create the certain operating condition. Manitoba Hydro suggests that the measure should more accurately require that the responsible entity provide evidence that it implemented its communication protocol so that...

Yes

Group

Pepco Holdings Inc & Affiliates

David Thorne

Agree

Group

NERC Compliance Group

Bill Thompson

Yes
As far as the August 2003 Blackout Report Recommendation, the COM-003-1 revisions address this concern. However, the criteria for communication protocols that need to be used should be established. The criteria needs to be applied to both COM-002 and COM-003. There is too much room for interpretation when it comes to measuring compliance.
Yes
Individual
Si Truc PHAN
Hydro-Quebec TransEnergie
Yes
Yes
Hydro Québec TransÉnergie proposes to change the wording of R2 to reflect the language used in M2. The current text has too many negative connotations and is difficult to understand. The requirement should be written : Each Balancing Authority, Reliability Coordinator, and Transmission Operator shall implement its communication protocols developed in Requirement R1 so that the failure to use the protocols by the issuer of an Operating Instruction does not result in an operating condition that requires the issuance of a Reliability Directive by the original issuer of the Operating Instruction or by another Balancing Authority, Reliability Coordinator, or Transmission Operator.
Group
PacifiCorp
Ryan Millard
Yes
No
PacifiCorp does not agree with the VRFs and VSLs associated with R2 because it is not clear how R2 is measured. M2 would require an entity to provide evidence that it did not issue an Operating Instruction that resulted in an operating condition that required the issuance of a Reliability Directive by the issuer or another Balancing Authority, Reliability Coordinator, or Transmission Operator due to the failure to use documented communications protocols developed for Requirement R1. In essence, an entity is required to prove that it did not do something that resulted in a condition which caused another entity to be issued a directive (that it may or may not be privy to, depending upon whether or not it was the original issuer of said directive). A requirement that is measured by the absence of evidence creates a challenging auditing environment for the industry. PacifiCorp strongly recommends that the drafting team reconsider the measures required for proving compliance with R2.

Individual
Joe O'Brien
NIPSCO
Agree
Julie Dyke , NIPSCO comments submitted Also, We would like to see COM-002 & 003 combined into a single standard. In R1 1.5 it appears that three way communication need only to be addressed in the communication protocol and not necessarily required. An operator may be reluctant to issue an RD which would possibly expose entities to R2 & R3 non-compliance.
Individual
Thomas Foltz
American Electric Power
No
AEP cannot vote in the affirmative for COM-003-1 as long as COM-002-2 R2 would be in effect at the same time. The standard establishes a higher bar for more routine communications than would be required for emergency situations. This would only confuse operators in determining which rules are to be followed under which specific circumstances. AEP still contends that it is unnecessary to obtain Reliability Coordinator's approval on the resulting documented communication protocols for the issuance of Operating Instructions in that Reliability Coordinator's area. Why would it be necessary to develop and document internal procedures regarding communication protocols when the proposed standard itself already provides specific instruction on the required communication? Is R 1.3 in any way redundant with TOP-002-2 R18? AEP proposes the elimination of COM-002-2 R2 and changing COM-003-1 as proposed below so that it covers all commands rather than a subset of commands. Operating Instruction —A command by a System Operator of a Reliability Coordinator, or of a Transmission Operator, or of a Balancing Authority, where the recipient of the command is expected to act 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. R1. Each Balancing Authority, Reliability Coordinator, and Transmission Operator shall adhere to the following communication protocols for the issuance of Operating Instructions in that entity's area. 1.1. The use of the English language when issuing or responding to an oral or written Operating Instruction, unless another language is mandated by law or regulation. 1.2. The instances, if any, that require time identification when issuing an oral or written Operating Instruction, specify the time zone unless the RC has previously established an operational timezone. 1.3. The nomenclature for Transmission interface Elements and Transmission interface Facilities when issuing an oral or written Operating Instruction. 1.4. The instances, when referencing letters, utilize the phonetic alphabet when issuing an oral Operating Instruction (Reference prior draft(s)) 1.5. In instances where the issuer of an oral two party, person-to-person Operating Instruction requires the receiver to repeat, restate, rephrase, or recapitulate the Operating Instruction and the issuer to: * Confirm that the response from the recipient of the

Operating Instruction was accurate; or \* Reissue the Operating Instruction to resolve a misunderstanding. R2. Each Balancing Authority, Transmission Operator, Generator Operator and Distribution Provider shall repeat, restate, rephrase, or recapitulate an Operating Instruction when required by the issuer of an Operating Instruction

Individual

Angela P Gaines

Portland General Electric Company

No

Portland General Electric Company (PGE) thanks you for the opportunity to provide comments. PGE is supportive of the intent of COM-003-1 and appreciates the work that the drafting team has put into the development of the proposed standard. However, the language in R2 and R3 is convoluted and confusing. The following is a suggestion for both R2 and R3: R2. Each Balancing Authority, Reliability Coordinator, and Transmission Operator shall implement its communication protocols developed in Requirement R1. Delete: so that the failure to use the protocols by the issuer of an Operating Instruction does not result in an operating condition that requires the issuance of a Reliability Directive by the original issuer of the Operating Instruction or by another Balancing Authority, Reliability Coordinator, or Transmission Operator. [Violation Risk Factor: Medium][Time Horizon: Real Time Operations] R3. Each Balancing Authority, Transmission Operator, Generator Operator and Distribution Provider shall repeat, restate, rephrase, or recapitulate an Operating Instruction when required by the issuer of an Operating Instruction in its communication protocols developed in Requirement R1. Delete: so that the failure to repeat, restate, rephrase, or recapitulate the Operating Instruction does not result in an operating condition that requires the issuance of a Reliability Directive by the original issuer of the Operating Instruction or by another Balancing Authority, Reliability Coordinator, or Transmission Operator. [Violation Risk Factor: Medium][Time Horizon: Real Time Operations] Then add the following to each Measure, (and RSAW) respectively: R2.1. Did the issuer of the Operating Instruction fail to use its approved Operating Instruction protocols it developed in R1? (yes/no) R2.2. Did the failure to use the approved Operating Instructions produce an operating condition requiring the issuance of an Reliability Directive? R3.1. Did the BA, TOP, GOP and DP fail to repeat, restate, rephrase, or recapitulate an Operating Instruction in its communications protocols developed in R1? R3.2 Did the failure to repeat, restate, rephrase, or recapitulate an Operating Instruction produce a condition requiring the issuance of an Reliability Directive? Also in R3, the phrase, "...in its communications protocols" do you mean in the issuer's protocol or the receiver's protocol?

Group

Arizona Public Service Company

Janet Smith, Regulatory Affairs Supervisor

Yes
Negative ballot cast on the Standard: For communication purposes, R1 should not include Reliability Coordinator (RC) approval. If a regional requirement (RC approval) is deemed necessary, then a regional standard should be developed that includes the procedure(s) and requirements to obtain RC approval of communication protocols.
Yes
Individual
Chris de Graffenried
Consolidated Edison Co. of NY, Inc.
No
Add the word "verbal" before the word "Operating Instructions" so that Requirement R1 reads: "R1. Each Balancing Authority, Reliability Coordinator, and Transmission Operator, in each Reliability Coordinator area, shall develop, subject to the Reliability Coordinator's approval, documented communication protocols for the issuance of verbal Operating Instructions in that Reliability Coordinator's area." Also make similar changes where required elsewhere.
No
FERC requires that VSL's be graded. The Requirement R3 VSL should be modified to reflect the following graded proposal: "The first failure following the effective date of this standard is a "Low VSL." However, should failures be more frequent, then the severity level for such failures should be increased. "For the second and subsequent failures following the effective date of the standard a single failure within a given 12-month rolling period is a Moderate VSL. "For the second and subsequent failures following the effective date of the standard and when there is more than one failure within a given 12-month rolling period the failure is a Severe VSL."
Individual
Russ Schneider
Flathead Electric Cooperative, Inc.
No
No, the 2003 Blackout recommendations were specific to control center and reliability coordinator entities. This standard appears to push down below to small DP entities that don't have control centers. Also, the Blackout recommendations were clearly concerned with "reliability" directives and did not contemplate a new category of Operating Instructions. The existing authority in other standards for registered entities to respond to reliability directives should be sufficient to address the recommendations without this standard.
No
Individual
Michelle R D'Antuono

Occidental Energy Ventures Corp.
Yes
<p>Occidental Energy Ventures Corp. (“OEVC”) would like to compliment the drafting team for finding a compliance solution that focuses only on the results of an improperly executed Operating Instruction. The approaches in previous drafts could be construed that entities retain proof that every applicable communication was monitored and verified – an impossible administrative task. We believe that Draft 6 of COM-003-1 removes the onerous compliance burden without freeing Operating entities from the obligation to perform responsibly. They are free to choose the level of sample communications to monitor, the amount of training they perform, and the internal disciplinary actions they take for non-compliance to the required protocols. However, there are consequences if their oversight is inadequate. We do have two concerns which we would like to air. First, that recipients of Operating Instructions must be informed that formal communication is being done. Although front-line Operators will be trained to comply with the appropriate protocol documents, they will be naturally inclined to follow the lead of the issuing entity – particularly if the communication is a borderline instruction. For example, a request for equipment status may be part of discussion concerning available alternatives, or information needed to confirm real-time stability. The recipient should not be left in a position to guess what the needs of the immediate situation are. Secondly, we would hope that the protocols developed by the various RCs, BAs, and TOPs are generally consistent. Even though we agree that each individual organization may have specific communications needs, it is in no one’s interest to have minor preferential differences between entities. Perhaps this is an issue that NERC’s performance management team can monitor – particularly as they have a highly vested interest in the resolution of Operating Instruction errors. These comprise a high percentage of outage root causes, and we are sure that uniformity will be a key improvement indicator.</p>
Yes
Individual
Anthony Jablonski
ReliabilityFirst
No
<p>ReliabilityFirst believes the newly included language in Requirement R1 “...subject to the Reliability Coordinator’s approval...” introduces three issues which need to be addressed prior to the draft standard being enforceable. The three issues include: 1) With the Reliability Coordinator being an Applicable Entity within this requirement, it is unclear which entity will be approving the Reliability Coordinator’s documented communication protocols? Based on the current language, the Reliability Coordinator would need to seek approval from themselves as the Reliability Coordinator. 2) There is no companion requirement requiring the Reliability Coordinator to approve the Balancing Authority’s and Transmission Operator’s documented</p>

communication protocols. It is inferred, but there is no requirement which explicitly requires the Reliability Coordinator to take action. Based on the current language in Requirement R1, if a Reliability Coordinator never takes action (approval or disapproval), where does this leave an entity for compliance purposes? 3) In the scenario where the Applicable Entity (Balancing Authority, Transmission Operator) develops documented communication protocols (which address the elements in sub parts 1.1 through 1.5) but the Reliability Coordinator disapproves, will the Applicable Entity be non-compliant with Requirement R1? The Applicable Entity has no control over action taken (approval or disapproval) by the Reliability Coordinator. Furthermore, since Requirement R2 and Requirement R3 depend on the documented communication protocols developed in Requirement R1, would the Applicable Entity be automatically found non-compliant with those two requirements as well? ReliabilityFirst offers the following two recommendations for the SDT to consider to address the ReliabilityFirst concerns with the newly included language "...subject to the Reliability Coordinator's approval...": 1) Remove the "...subject to the Reliability Coordinator's approval..." language from Requirement R1. Add a new requirement requiring the Applicable Entities to make their documented communication protocols available to all the other Applicable Entities within in each Reliability Coordinator area. 2) Make Requirement R1 applicable to only the Reliability Coordinator and remove the "...subject to the Reliability Coordinator's approval..." language. This will require the Reliability Coordinator to develop one consistent set of documented communication protocols for all entities within their Reliability Coordinator area. This will also allow the Reliability Coordinator to tailor the documented communication protocols to address uniqueness among Balancing Authorities and Transmission Operators (e.g., asset density, locations and organizational structure) within their area. If the SDT agrees with either of these recommendations, the sub-parts for Requirement R1 and both Requirement R2 and Requirement R3 would remain relatively unchanged.

No

ReliabilityFirst has a concern with the VSLs for Requirement R1. In the previous draft, the VSLs for Requirement R1 were gradated based on missing "x" out of nine sub-parts. For example, missing 44% (four out of nine) of the sub-parts was a Severe VSL). With the current draft only including five sub-parts under Requirement R1, the gradation should be adjusted accordingly. ReliabilityFirst believes that an entity not addressing more than half of the sub-parts within the documented communication protocols is missing the intent of the requirement and should be a Severe VSL. Furthermore, if the "...subject to the Reliability Coordinator's approval..." language continues to remain in Requirement R1 (against our recommendations in previous comments), this "Reliability Coordinator approval" needs to be included in the VSLs as well. ReliabilityFirst offers the following as an example for consideration: i. Lower VSL – none ii. Moderate VSL – "...did not develop one (1) of the five (5) parts..." iii. High VSL – "...did not develop one (2) of the five (5) parts..." iv. Severe VSL - "...did not develop one (3) of the five (5) parts..." v. Severe VSL - "The Responsible Entity did not receive Reliability Coordinator approval of its documented communication protocols as required in Requirement R1."

Individual

Texas Reliability Entity

Texas Reliability Entity

No

(1) Definition of Operating Instruction: We remain concerned about potential interference between COM-002 and COM-003. While it has been made abundantly clear in this draft that a Reliability Directive is not an Operating Instruction, it remains unclear exactly where the boundary between them is. We are concerned that an operator faced with an imminent emergency situation will have to stop to consider whether he needs to issue a Reliability Directive or an Operating Instruction, and entities will be subject to second-guessing as to whether they picked the right one. COM-002 and COM-003 should be melded into one coherent standard that will not interfere with system operations. (2) The present draft does not address one-to-many communications (hot-line calls, all-calls), which are commonly used to convey Operating Instructions in critical situations. A repeat-back procedure for those calls should be included in an entity's documented communications protocols. (3) While we respect the desire to avoid writing a "zero-defect" standard, we strongly object to the approach taken in requirements R2 and R3. Compliance with these requirements should not be based on whether a subsequent Reliability Directive was issued. Instead, compliance should be based on whether the communication protocols are routinely and effectively implemented (perhaps using an "identify/assess/correct" approach). The present draft allows system conditions over which the entity may have little control (i.e. luck) to determine whether a deviation from its protocols results in a violation. Importantly, the current draft may create an undesirable incentive for an operator to avoid issuing a Reliability Directive in order to avoid scrutiny of prior Operating Instructions. (4) We also object to basing compliance with R2 and R3 on whether the entity's conduct "resulted in" an adverse operating condition. The existence of a violation should be based solely on the entity's conduct, not on the results of that conduct on system conditions. The proposed approach creates an unmanageable compliance assessment burden, as parties will dispute whether events were causally related, which can be very difficult to conclusively assess. Furthermore, what does "result in" mean? Does it require proximate cause, direct cause, contributing cause, or some other measure of causal relationship? (5) The proposed revisions in COM-003 interact with the revisions in TOP-001-2 to create a reliability gap that will reduce the performance level required by the standards. The existing requirements 3 and 4 of TOP-001-1a require TOP, BA, GOP, DP and LSE entities to comply with reliability directives (not capitalized) issued by a TOP. We interpret "reliability directives" in that standard to include all operating instructions related to reliable system operation, including those that are proposed to be defined as both Reliability Directives and as Operating Instructions. The new version TOP-001-2 (pending at FERC) limits the compliance requirement to only Reliability Directives (defined term), and will no longer require compliance with Operating Instructions issued by TOPs. This problem is enhanced by the proposed definition of Operating Instructions, which now emphasizes that Operating Instructions and Reliability Directives are mutually exclusive. There needs to be a reliability standard that requires compliance with Operating Instructions issued by TOPs, and the absence of such a standard creates a reliability gap.

Group
City of Garland
Ronnie Hoeinghaus
No
<p>Three part communications is a standard business practice in transmission and distribution operations across the country. If by chance there is / was a company that was not using three part communications, that company would have had to develop a procedure / policy for three part communications to be compliant with COM-002-2 R2 (COM-002-3 R2 future). Therefore, the proposed COM-003 R1 requiring companies to develop “documented communication protocols” that have to be approved by the Reliability Coordinator is nothing more than a compliance burden to maintain documentation for an audit. Furthermore, COM-003 R3 requires use of three part communications and should be the only requirement in COM-003. Because of COM-002-2 R2 and COM-003 R3, COM-003 R1 is merely a paperwork compliance burden and should be deleted. COM-003 R2 relies on R1 and therefore it should be deleted also. As previously stated, COM-003 should only contain the requirement listed in the current R3.</p>
No
<p>R2 &amp; R3 only have a “Severe VSL” listing - As I understand it, NERC has recognized that “perfect” historical compliance is not practical and is one of the reasons NERC is moving to implement the RAI program. R2 &amp; R3 Severe VSL only listings require 100% perfection - Real life operations is not perfect (as recongnized by the RAI) – VSLs should be a gradient from “lower” to “severe”</p>
Individual
Dennis Schmidt
City of Anaheim
Yes
<p>The proposed Standard language appears to address the requirements of FERC Order 693. However, R3 is still confusing and appears to assume that the distribution provider or generator operator would have some way of knowing if an Operating Instruction would “result in an operating condition that requires the issuance of a Reliability Directive by the original issuer of the Operating Instruction or by another Balancing Authority, Reliability Coordinator, or Transmission Operator.” Also, more clarification is needed with respect to the terms "restate", "rephrase" and "recapitulate". We suggest the the following language for R3: “Balancing Authorities, Transmission Operators, Generator Operators and Distribution Providers shall repeat or restate an Operating Instruction given to them when required by the issuer of that Operating Instruction.”</p>
Group
Dominion

Connie Lowe
Yes
Dominion appreciates the SDT efforts on this project as we know it has not been an easy task to satisfy industry concerns while at the same time, addressing FERC directives relative to this issue. We believe that having a requirement that the communication protocol be approved by the RC, while possibly considered an administrative burden by them, greatly enhances consistency of such protocols. And, we greatly appreciate the fact that recipients are required to repeat, restate, rephrase, or recapitulate only when required by those approved protocol.
Yes
Group
PPL NERC Registered Affiliates
Brent Ingebrigtson
No
These comments are submitted on behalf of the following PPL NERC Registered Affiliates (PPL): Louisville Gas and Electric Company and Kentucky Utilities Company; PPL Electric Utilities Corporation, PPL EnergyPlus, LLC; and PPL Generation, LLC, on behalf of its NERC registered affiliates. 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. PPL has generally supported draft 4 and draft 5 of the COM-003 standard. However, the significant changes proposed in draft 6 introduce ambiguity, as well as several other issues that need to be addressed. First, the proposed definition of an “Operating Instruction” continues to require clarification. PPL NERC Registered Affiliates suggest the following definition to address the above issue: “Operating Instruction - A Real-time Operations command, other than a Reliability Directive, by a System Operator of a Reliability Coordinator, or of a Transmission Operator, or of a Balancing Authority, where the recipient of the Real-time Operations command is expected to act 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, potential options and/or alternatives to resolve Bulk Electric System operating concerns is not a command and is not an Operating Instruction. An Operating Instruction is exclusive and distinct from a Reliability Directive. There is no overlap between an Operating Instruction and Reliability Directive.” The focus of COM-003 is on operations, and therefore the communications subject to the COM-003 requirement should be those requiring action in the Real-time Operations time horizon — i.e., actions required within one hour or less. (See definition provided in a NERC document at: <a href="http://www.nerc.com/files/Time_Horizons.pdf">http://www.nerc.com/files/Time_Horizons.pdf</a> ). During the Q/A portion of the November 27, 2012 conference call hosted by the SDT, the SDT stated that they intended to narrow the focus of the timeframe of an Operating Instruction to the Real-time Operations time horizon. . Second, there is inconsistency in the wording of some parts of R1. Specifically, PPL

recommends revising part 1.5 as follows: “The instances, if any, where the issuer...” or removing the ‘if any’ from R1.2 and R1.4, since it is redundant to the R1 ‘where applicable’ and the use of ‘when, that, etc.’ in the sub requirements. Third, both R2 and R3 as currently written may not aid in enhancing reliability. PPL suggests R2 be revised to require the BA, RC, and/or TOP provide their communication protocols to the GOPs, DPs with whom they communicate. PPL suggests language for R3 be revised to read as follows: “Each Balancing Authority, Distribution Provider, Generator Operator, Reliability Coordinator, and Transmission Operator shall assess its adherence to the applicable documented communication protocols developed for R1 and R2.” As currently drafted, R2 and R3 appear to require that entities issuing or receiving Operating Instructions must prove that no BA, RC or TOP issued a Reliability Directive as a result of their lack of use of the R1 protocol or of three-part communication. The R2 draft language says that the BA/RC/TOP communication protocols must be developed such that even when the communication protocols are not used, there is still no need for a Reliability Directive. This could imply that if no Reliability Directive is required, the failure to use the protocols created no risk and the communication protocol was not needed. This appears to make inconsequential any reliability benefit of R1 of the Standard. Also, R3 has requirements for entities that may not have received the communication protocols developed by the BA/RC/TOP. Fourth, there is ambiguity introduced in R2 and R3 through the use of the phrase “that requires the issuance.” It is unclear who would determine whether the Reliability Directive was “required.” Likewise, if there are multiple incidents which contribute to the issuance of a Reliability Directive, it is not clear what weight would be given to the lack of use of communication protocols, nor is it clear how that determination is made. Finally, M2 and M3 introduce an expectation that applicable entities will need to coordinate to produce evidence. PPL recommends that M2 and M3 be revised to align with the changes made to R2 and R3 as noted above.

Individual

Matthew P Beilfuss

Wisconsin Electric Power Company

No

Version 6 of the standard does not explicitly limit the timeframe prior to the issuance of a Directive subject to review for compliance with communication protocol requirements. Additionally, the draft Standard and definition of Operating Instruction do not adequately define instances where Operating Instructions would require 3-way communications. The process by which a Reliability Coordinator approves instances where communication protocols are required will define the substantial requirements in the standard. Establishing the Reliability Coordinator as an approval authority for BA or TOP internal procedures implies the RC will have responsibility for operational activities and/or procedures owned by the BA or TOP and essentially outsources the standard development to the Reliability Coordinator.

Individual

Kathleen Goodman
ISO New England Inc.
Agree
ISO/RTO Standards Review Committee (SRC)
Individual
Joe Tarantino
Sacramento Municipal Utility District
Yes
<p>Although SMUD agrees with the draft 6 of COM-003-1. Also, we are in support of the finding from the Independent Standards Review Panel’s final report for mitigating BPS risks as noted:</p> <p>~~~~~</p> <p>~~~~~ Resolve COM-002 and COM-003 by requiring three-part communication for operational directives and for registered entity defined operational instructions that involve taking specific actions or steps that would cause a change in status or output of the BPS or a generator. This does not include three-part communication for myriad of conversations where information is being exchanged or options are being discussed.</p> <p>~~~~~</p> <p>~~~~~</p>
Group
North American Generator Forum Standards Review Team
Patrick Brown
No
<p>R3 can present an excessive or even impossible compliance burden, in that all parties receiving Operating Instructions must prove that no BA, RC or TOP issued a Reliability Directive as a result of their lack of three-part communication. This is not a matter of simply obtaining annually a “No known errors” letter from the BA, RC and TOP with which a receiving-end entity is directly involved, since all the neighboring BAs, RCs and TOPs are drawn-in by R3 as well. There is meanwhile no requirement that BAs, RCs or TOPs issue such letters when requested to do so, or that they must share any information at all regarding Reliability Directives issued. This leaves GOPs and other entities that receive Operating Instructions in danger of self-certifying compliance to R3, then being later confronted with evidence of non-compliance from a source from whom they had previously heard nothing. The issue of interpretation also creates undue ambiguity. Who will make the determination of cause when a Reliability Directive is issued, and is that opinion subject to review if objections are raised? If all GOPs in a region were instructed to bring all available generators online at their Emergency Rating due to tripping of a 2000 MW nuclear plant, for example, and the operator of a 10 MW blackstart unit did not respond in the prescribed fashion, and a Reliability Directive ultimately had to be issued to shed some load, did that 10 MW unit “cause” the load shedding? R3 should be revised to match the draft that</p>

was issued for comments several weeks ago, and which the NAGF found acceptable. That is, R3 should state that “Each Balancing Authority, Distribution Provider, Generator Operator, Reliability Coordinator, and Transmission Operator shall develop method(s) to assess, as applicable, System Operators’ and operators’ communication practices and implement corrective actions necessary to meet the expectations in its documented communication protocols developed for Requirement R1 and R2.”

No

The VRF and VSL language for R3 should be changed to that of the draft version of Draft 6 that was commented-on by the NAGF several weeks ago.

Individual

Michael Falvo

Independent Electricity System Operator

No

Despite we have always held a position that this standard was not needed given the approved COM-002-3 and the NERC OC’s operating guide on operating personnel communication, we supported the previous version of COM-003-1 (Draft 5) as it was a clearly written standard which would be an acceptable compromise for meeting the FERC directive and BoT’s direction without overburdening industry participants having to repeat every operating instruction. This latest version, Draft 6, however, turns an acceptable standard into one that is ambiguous and provides an escape clause for operating personnel to not comply with the basic requirement (R1). The introduction of the condition in R2 “so that the failure to use the protocols by the issuer of an Operating Instruction does not result in an operating condition that requires the issuance of a Reliability Directive by the original issuer of the Operating Instruction or by another Balancing Authority, Reliability Coordinator, or Transmission Operator.” creates a number of issues with the standard, as follows: a. The issuance of a Reliability Directive may be caused by a number of reasons, for example: the operating instruction (repeated or otherwise) may not be sufficient to address a potential condition that has an Adverse Reliability Impact; b. The operating instruction that is communicated, with or without adhering to the protocols developed in R1, is in fact moving other system conditions from a reliable state to one that has a potential of having Adverse Reliability Impact, for which a Reliability Directive needs to be issued after implementing the communicated operating instruction. c. The operating personnel may second guess whether or not a Reliability Directive will be issued if the established communication protocols are not implemented (such as by requiring 3-part communication) before it takes the required action. This puts the need to comply with a requirement into a “condition assessment” mode, which defeats the purpose of having a reliability standard to manage risk and meet performance expectation whose reliability outcome are predetermined, not on the fly. d. The added condition is a compliance assessment element with which to gauge violation severity or sanction; itself is not a requirement. By introducing this to the requirement, it convolutes the requirement, adds nothing to meeting the reliability objectives, and may in fact jeopardize reliability. And what if a Reliability Directive was not issued despite the failure of Responsible Entity to implement its communication protocol. Is the Responsible

Entity deemed compliant with the requirement? If so, do Requirements R2 and R3 drive the right behaviors? If not, then what's the value and influence of the added condition in the assessment outcome? Requirement R1 clearly requires the responsible entity to develop documented communication protocols for the issuance of Operating Instructions. By Part 1.5, the instances where the issuer of an oral two party, person-to-person Operating Instruction requiring the receiver to repeat, restate, rephrase, or recapitulate the Operating Instruction and subsequent actions by the issuer are already clearly stipulated in the documented communication protocols. Responsible entities simply need to implement the protocols as documented, regardless of whether failure to do so would result in having to issue a Reliability Directive, or any other possible outcomes, for that matter. Similar comments apply to Requirement R3 when the responsible entities are required to close out the last part of the 3-part communication.

Yes

We agree with the VRFs, but not the VSL since we do not agree with Requirements R2 and R3. We offer the following two additional comments: 1. We do not agree with the Long-term Planning Time Horizon for R1. Developing and documenting communication protocols for use during real-time operations is an operational planning process (or mid-term planning, at most), not a long-term planning process. We suggest to change the Time Horizon to Operations Planning. 2. The proposed Implementation Plan conflicts with Ontario regulatory practice with respect to the effective date of the standard. It is suggested that this conflict be removed by appending to the effective date wording, after "applicable regulatory approval" in the Effective Dates Section of the Implementation Plan, to the following effect: ", or as otherwise made effective pursuant to the laws applicable to such ERO governmental authorities." Prior to the wording "; or, In those jurisdiction....". Alternatively, the same language in the Effective Dates Section of the Implementation Plan could be used.

Individual

Terry Bilke

MISO

No

The blackout recommendation 26 had little or nothing to do with operator communications. The recommendation was to implement some type of communication system to keep Regions, NERC and regulators informed during emergencies. Here is the recommendation: "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." These are our comments on what is presented in this revision of COM-003-1. • We're generally OK with a requirement to develop a set of communication protocols and whereby the applicable entity does a periodic assessment of its operators' adherence to the protocols. •

While we believe that it is acceptable for a BA and TOP to develop their own protocols, it would be preferable that they be allowed to use a set of protocols developed by the RC. • We disagree that the RC should approve others' protocols. What are the criteria for approval? NERC should not put RCs in the role of de-facto compliance monitors. • There is a likely unintended consequence of the latest draft. This will plant a seed of doubt in an operator's mind whether or not to issue a reliability directive due to the scrutiny and second guessing that will be the outcome of each investigation associated with a directive. This standard will result in investigations associated with each directive. • We were OK with the previous version. We'd be OK with a revision to the current draft if there was an ex post assessment of operating instructions following the issuance of a directive. There should not be a rabbit-trail investigation following the issuance of each directive.

Group

Bonneville Power Administration

Jamison Dye

Yes

Yes

Individual

Alice Ireland

Xcel Energy

We are electing to not respond directly to this question, as we have expressed concern with the advancement of this project many times in the past. While this draft seems far superior to the others, the proposed change to R1 raises concern over the portion that dictates that the Reliability Coordinator has approval authority over the communications protocols for Operating Instructions. The majority of the Operating Instructions, as defined by the standard, will be between the System Operator at a Balancing Authority or Transmission Operator and their respective field personnel. Communications between System Operators of BAs and TOPs and field personnel have well-established protocols and should not necessarily be held to the same protocol as communications between BAs or TOPs and the Reliability Coordinator. In essence, the proposed change to R1 places the Reliability Coordinator in a position to dictate communication protocols that may breakdown the well-established protocols of the BAs and TOPs and create more burdensome communication with their field personnel.

Individual

Mary Downey

City of Redding

Agree
SMUD
Individual
Jack Stamper
Clark Public Utilities
No
<p>Requirement 1 does adequately address the concerns. Requirements 2 and 3 are confusing and difficult interpret. It was not until I rea the FAQ on COM-003 that I understood R2 and R3. I believe R2 and R3 should be revsed as described below. R2. R2 needs to indicate that it is only applicable to issuers of Operating Instructions. R2 should be revised to read as follows: Each Balancing Authority, Reliability Coordinator, and Transmission Operator that issues an Operating Instruction shall implement its communication protocols developed in Requirement R1 so that the failure to use the protocols by the issuer of an Operating Instruction does not result in an operating condition that requires the issuance of a Reliability Directive by the original issuer of the Operating Instruction or by another Balancing Authority, Reliability Coordinator, or Transmission Operator. With the change it is clearer that the standard is saying that an issuer of an Operating Instruction is supposed to have a communication protocol(R1). R2 is stating the issuer of an Operating Instruction needs to use the communication protocol and if the issuer's failure to use the communication protocol results in the issuance of a Reliabilty Directive, a violation has occured. R3. R3 needs to indicate that it is only applicable to recipients of Operating Instructions. R3 should be revised to read as follows: Each Balancing Authority, Transmission Operator, Generator Operator and Distribution Provider that receives an Operating Instruction shall repeat, restate, rephrase, or recapitulate the Operating Instruction when required by the issuer of the Operating Instruction (in accordance with the issuer's communication protocols developed in Requirement R1) so that the failure to repeat, restate, rephrase, or recapitulate the Operating Instruction does not result in an operating condition that requires the issuance of a Reliability Directive by the original issuer of the Operating Instruction or by another Balancing Authority, Reliability Coordinator, or Transmission Operator. With the change it is clearer that the standard is saying that a recipient of an Operating Instruction is supposed to to repeat, restate, rephrase, or recapitulate the Operating Instruction when required by the issuer and if the recipient's failure to repeat, restate, rephrase, or recapitulate the Operating Instruction (as long as it is required in the issuer's communication protocol) results in the issuance of a Reliabilty Directive, a violation has occured.</p>
Yes
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
<p>R1 • The phrase “subject to the Reliability Coordinator’s approval” is included in the requirement, but there is no reference to RC approval in the measure. It is unclear exactly what the expectations are for TOPs and BAs in this requirement. Are they to develop protocols and submit to the RC for approval, and have a record of this approval for compliance evidence? If so, the SDT needs to modify this requirement to make the required actions very clear. EOP-005-2 is an example of the TOP getting approval from the RC on its restoration plan. This may be a better model to use as it is more clear. • In addition, the RC is required to approve its TOPs / BAs protocols; however there is no guidance on what criteria to base this approval on. There needs to be very clear guidance that RCs are to ensure that the protocols are compatible with its protocol and that RCs are not “auditing” the TOPs / BAs protocols to confirm they include all the subparts of requirement R1. R3 • R3 can present an excessive or even impossible compliance burden, in that all parties receiving Operating Instructions must prove that no BA, RC or TOP issued a Reliability Directive as a result of their lack of three-part communication. This is not a matter of simply obtaining annually a “No known errors” letter from the BA, RC and TOP with which a receiving-end entity is directly involved, since all the neighboring BAs, RCs and TOPs are drawn-in by R3 as well. There is meanwhile no requirement that BAs, RCs or TOPs issue such letters when requested to do so, or that they must share any information at all regarding Reliability Directives issued. This leaves GOPs and other entities that receive Operating Instructions in danger of self-certifying compliance to R3, then being later confronted with evidence of non-compliance from a source from whom they had previously heard nothing.</p>
Individual
Bob Thomas
Illinois Municipal Electric Agency
Agree
Florida Municipal Power Agency, and SERC OC Standards Working Group
Group
Oklahoma Gas & Electric
Terri Pyle
Yes
<p>There is still concern that the intent of Recommendation 26 was strictly for emergency situations which are covered by COM-002-3. While well intentioned, based upon the spirit of the Paragraph 81 initiative, OG&amp;E believes the current draft of the COM-003-1 standard to be more of an administrative burden than an improvement to reliability.</p>
Yes

There were a couple of typos in the VSLs: R1 – Insert a space between ‘R1’ and ‘in’ in the Lower VSL. R3 – Insert ‘to’ between ‘failed’ and ‘repeat’ in the Severe VSL.

Individual

Don Weaver

New Brunswick System Operator

No

The introduction of the condition in R2 “so that the failure to use the protocols by the issuer of an Operating Instruction does not result in an operating condition that requires the issuance of a Reliability Directive by the original issuer of the Operating Instruction or by another Balancing Authority, Reliability Coordinator, or Transmission Operator.” creates a number of issues. • The issuance of a Reliability Directive may be caused by a number of reasons, for example: the operating instruction may not be sufficient to address a potential condition that has an Adverse Reliability Impact; • R2 has the unintended consequence of making Reliability Directives a subject of a Root Cause analysis. Whenever a Reliability Directive is issued it would be necessary for the issuer to prove that that Reliability Directive was not linked to an Operating Instruction protocol failure.

Individual

Steven R. Wallace

Seminole Electric Cooperative, Inc.

No

While the draft may meet the Blackout Recommendation and Order 693, the draft is problematic and is resulting in Seminole changing its votes from prior affirmation to negative with this ballot. The reasons are: 1. The requirement for RC approval of entity developed communications protocols (R1), which impose an unreasonable administrative and associated cost burden upon all of the applicable entities. 2. The new connection to Reliability Directives issued by an RC, TOP, or BA, which are due to the failure of an applicable entity to properly implement its communication protocols for Operating Instructions, seemingly implies compliance investigation following the issuance of any RC Reliability Directive, for all entities affecting the RC area’s footprint (R2&3). 3. The term Operating Instruction is so broad, that every System Operator communication might require logging, recording and compliance review.

No

The VSL’s are far too high given the ambiguity inherent to the R2 and R3 requirements as written.

Individual

Greg LeGrave

Wisconsin Public Service Corp

Yes

Also, since enforcement and compliance under Version 6 hinges on a Reliability Directive being issued, am I correct to assume that if emergency conditions requiring actions on the BES were to occur, but an issuing entity failed to announce their request for action as a Reliability Directive – then NO Directive was issued, and therefore there could be no COM-003 violation for that event and no need to analyze if preceding Operating Instructions were given which may have lead up to the Emergency condition? Note: COM-003 Rev. 6, R3 “... an operating condition that requires the issuance of a Reliability Directive...” so put another way, what if a Reliability Directive was required – but not clearly identified as in COM-002 V3, R1? The future COM-002 V3, R1 requires an issuing RC, TOP, or BA (or LBA) in part, to clearly call a Reliability Directive a Reliability Directive. I couldn’t find similar language for Operating Instructions in Rev. 6 of COM-003. Is it intended that this will need to be included in each entities communications protocol, along with the need for the issuing entity to clearly communicate “...and I will need you to repeat this back.”? My concern here is that while I like the SDT’s approach with R3 in Rev. 6, if only R3 applies to DP’s and GOP’s (and therefore they are not required to have or to implement communications protocols), if the issuer of an Operating Instruction doesn’t clearly identify it as such AND tell the recipient in advance that he requires a repeat-back, it will be difficult for the recipient who is a DP or GOP to meet the R3 requirement. Conversely, based on the high number of Operating Instructions occurring each day, perhaps it was the intent of the SDT that DP’s and GOP’s which are limited to simply how to respond to Directives and/or Instructions with repeat-backs. Please clarify. Lastly, I mentioned the concern under M3. Rather than just stating it is confusing, I’m listing a proposed change for consideration if the Standard doesn’t get approved as is. We hope it is more clear in its wording and its expectation that the issuer of any Directive should lead efforts to complete an analysis of what lead up to a Directive. Draft 6 proposal for M3: Each Balancing Authority, Generator Operator, Distribution Provider, and Transmission Operator shall provide evidence that it did not experience a failure to repeat, restate, rephrase, or recapitulate an Operating Instruction, when required, that resulted in an operating condition that required the issuance of a Reliability Directive by the issuer or by another Balancing Authority, Reliability Coordinator, or Transmission Operator due to the failure to use the protocols. A Balancing Authority, Generator Operator, Distribution Provider, and Transmission Operator may need to coordinate with a Reliability Coordinator, Balancing Authority and Transmission Operator to provide this evidence. WPS proposal for M3: The issuer of a Reliability Directive shall provide evidence that a failure to repeat, restate, rephrase, or recapitulate an Operating Instruction, when required, resulted in an operating condition that required the issuance of a Reliability Directive. A Balancing Authority, Generator Operator, Distribution Provider, and Transmission Operator may need to coordinate with a Reliability Coordinator, Balancing Authority and Transmission Operator to provide this evidence.

Yes

Individual

Carter B. Edge
SERC Reliability Corporation
Yes
It addresses parts of each. While a reliability standard may not be the most appropriate control to address the reliability concern, this standard, in conjunction with COM-003-2 does address the Standards Authorization Request to require that real time system operators use standardized communication protocols during normal and emergency operations to improve situational awareness and shorten response time. There is concern with making protocols (and any revisions) available to those who are expected to comply. R1 states that the RC must approve; M1 states that each...shall provide. It is not clear that those who must comply will have the latest version. Suggest that the Measure be tightened up to state that the RC must provide the approved communication protocols to the .... in thier footprint.
No comment
Individual
Randi Nyholm
Minnesota Power
Minnesota Power supports comments submitted by the MRO NERC Standards Review Forum (NSRF).
No
Similar to Restoration Plans, Registered Entities are capable of coordinating communication protocols with their neighbors without Reliability Coordinator approval. Minnesota Power recommends removing Reliability Coordinator approval from the Requirements.
No
Group
SERC OC Review Group
Stuart Goza
Yes
We agree on a very limited view that Recommendation 26 is addressed. However, when looking at reliability we are concerned that the administrative burden, and uncertainty of which Operating Instruction will become a Reliability Directive may negatively impact BES reliability in the reluctance of issuing a Reliability Directive. Therefore, we strongly recommend that the SDT review this draft and redraft to clarify these points. Measure 3 should be changed to "when required by the issuer" in order to provide clarity and consistency with R3. In addition, we believe that a statement needs to be added in R1 that includes providing or distributing those communication protocols developed by a BA or TOP to their associated DPs and GOPs. This would address a potential gap of DPs and GOPs not aware of the communication expectations when communicating with BAs and TOPs when given an

Operating Instruction.
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
ACES Standards Collaborators
Ben Engelby
No
(1) While we understand that there are numerous approaches to satisfy the FERC order and the 2003 Blackout Report, we disagree that the drafting team addresses these concerns in a measurable and uniform process. The FERC Order and the Blackout Report both call for a “tightening of communications.” We are not convinced that giving the RC the authority to approve communication protocols will result in less confusion and a tightening of communications. There are currently 15 Reliability Coordinators in the NERC Compliance Registry, which leaves 15 opportunities for inconsistent application of what constitutes an “Operating Instruction.” (2) Further, we are concerned that by granting the Reliability Coordinator the authority to approve a registered entity’s communication protocol, there may be differing protocols among the various RC areas, which would negatively impact registered entities that are located in more than one RC area. For entities that operate in multiple RC areas, there could be different criteria for what constitutes an Operating Instruction, differing line and equipment identifiers, and other nuances that result in confusion and lead to an increase in miscommunication. The standard does not require uniform communication protocols among the various Reliability Coordinators. (3) In addition, how would an entity communicate to a neighboring BA and TOP who are in a different RC area with different protocols? This draft poses significant issues for registered entities located on the seams of RC areas that communicate to other entities in other RC areas. (4) We have an issue with the language in the Measure M2. Measure M2 requires a registered entity to prove the negative that no reliability directives occurred. This presents an issue because some regions are reluctant to accept attestations as evidence. This approach is an increased compliance burden on registered entities. This draft did not include an RSAW for review and we recommend the drafting team provide further clarification that an attestation is acceptable for compliance and continue to work with NERC compliance on this issue. (5) Finally, we disagree with the revised definition of Operating Instruction and the approach of Requirement R2 and R3. Under the revised definition, an Operating Instruction is separate from a Reliability Directive, but an entity will only be in violation for failing to communicate effectively that would result in the issuance of a Reliability Directive. This is double jeopardy. An entity could be in violation of both COM-002 and COM-003 for failing to communicate effectively that results in an event on the Bulk Electric System. This issue has been stated in our earlier comments that the definitions and the two COM standards would be better as a combined standard instead of the separate projects to avoid this potential compliance issue.
No

(1) We disagree with the VSL for R1. The compliance violation should fall on the RC for failing to approve the communication protocol and it should be up to the RC to ensure the sub-parts 1.1 through 1.5 are included in the protocol. Under the current draft, the RC has approval authority without any accountability. The VSL would find the entity in violation of R1, even though it would be at the mercy of the RC to approve its protocol. (2) The VSLs for R2 and R3 imply that a violation of COM-002 also occurred. We cannot support a standard that has the potential for multiple violations.

Group

Southwest Power Pool Regional Entity

Emily Pennel

Yes

What is the expected time frame for the RC's initial approval of the protocols? NERC needs to clarify the protocol approval dates in relation to the effective/enforceable date.

Yes

Group

Associated Electric Cooperative, Inc. - JRO00088

David Dockery

No

AECI strongly supports the SERC OC Q1 comments posted for this draft. In addition, AECI believes that COM-003 fails to properly address related topics found within the August 2003 Blackout Report Recommendation number 26 and FERC Order 693, primarily because of the SDT's having included DPs within the COM-003 scope, and thereby overreaching these two citation's intended scope. In the case of the August 2003 Blackout Recommendation 26, while its terse two-sentences appear to be met by COM-003, the same report's pp 161-162 clarifies its intended scope being "during alerts, emergencies or critical situations." That same section's "particularly during alerts and emergencies", might be stretched to include COM-003 Operating Instructions for DPs, yet FERC's determination, expressed within Order 693 paragraphs 493, 509-512, suggests that NERC COM-003 is attempting to tread where FERC itself dared not go. Within that paragraph 493, FERC's rationale cites no more than "when generators with blackstart capability must be placed in service and nearby loads restored as an initial step in system restoration", in support of exercising governance over DP telecommunications. These two limited conditions for communication appear confined to COM-002, and not COM-003's drafted governance over external communications with DPs. Paragraph 509's real-time staffing requirement omits DPs. Paragraph 510.3 cites DPs as applicable under COM-002, and 510.4 "requires tightened communications protocols, especially for communications during alerts and emergencies" and then par 510 goes on to propose a new standard (COM-003?) for addressing the Blackout Report Recommendation 26. Paragraph 512's assertion "that, during both normal and emergency operations, it is essential that the transmission operator,

balancing authority and reliability coordinator have communications with distribution providers" appears to conflict with earlier par 509 with regard to levels of "essential", and then asserts that many DPs are "not a user, owner or operator of the Bulk-Power System" so not required to comply with COM-002 (nor therefore COM-003). However COM-003 fails to provide for such differentiation within its Applicability section 4.1.2, for its scope of governance over DP communications during "normal operations". AECl recommends that DP applicability be dropped from COM-003 and reserved for COM-002 where these citations rationale for inclusion is clear. Finally, because industry balloting appears highly conflicted over the terms under which COM-003's rules would be developed, AECl strongly suggests that the SDT limit scope to only communications between RCs and their external communicating parties. This stance would have stronger backing from the above citations, and would make more sense, because only RCs communicate changes to the BES. New governance over the exact manner in which communicated changes become executed, is where industry appears to have heartburn. This may be occurring because much of industry has already tweaked and tuned those operational methodologies long before RCs came into existence, and therefore see much greater Compliance risk being ventured, for relatively little BES-reliability gains.

No

See AECl comment to Q1 above, with respect to DPs. While the SDT did follow Guideline 5, the resulting VSLs with respect to communication with these functional entities under normal operating conditions, hardly merits a medium risk assessment, whereas COM-002 might. Further, the SDT's VRF and VSL justification for COM 003-1, R2 "FERC VRF G1 Discussion" assertion that R2 is consistent with Recommendation of 26...", ignores the same report's "particularly during..." qualifier. See AECl response to Q1 above.

Group

seattle city light

paul haase

No

Seattle remains confused as to the intent of the draft Standard. R1 appears to require a protocol for communications that need not be followed in R2 or R3, because only communications problems leading to a Reliability Directive are to be audited. Seattle does not know if this position satisfies the FERC Order or the SAR. As proposed, the present Standard draft could be simplified to a single requirement to "communicate in such a way as to avoid Reliability Directives." On the other hand, if the intent is to REQUIRE three-way communications, then present draft R2 and R3 do not do so.

Yes

Individual

Kayleigh Wilkerson

Lincoln Electric System

Agree

MRO NERC Standards Review Forum (NSRF)
Group
Tennessee Valley Authority
Brandy Spraker
Agree
SERC OC Standards Review Group
Group
MRO NERC Standards Review Forum (NSRF)
Russel Mountjoy
No
The NSRF does not believe that this Standard is necessary to address recommendation 26 of the Blackout Report, thus this project should be terminated. The NSRF suggests that COM-002-3 be filed with FERC as approved by the NERC BOT, as we believe it adequately addresses the Blackout recommendation 26 and FERC Order 693. However, if the NERC SC wants to continue with this development, we provide the following recommendations. For Measure 2 and Measure 3, the SDT is requiring each registered entity to 'prove the negative' by requiring each entity to demonstrate that each Operating Instruction issued by its System Operators did not result in an operating condition that required the issuance of a Reliability Directive. From the webinar on July 2, the SDT stated that all an entity needs to do is request an attestation letter from its, RC and neighboring TOPs and BAs. Some entities are reluctant to issue such blanket attestation letters and some Regional Entities do not accept attestation letters as proof of compliance. The SDT went on to say the Reliability Directives are rare. The NSRF suggests changing M2 & M3 to state: M2. When a Reliability Directive is issued, demonstrate that it was not the result of a Reliability Coordinator, Transmission Operator or Balancing Authority's failure to use documented protocols when issuing an Operating Instruction developed for Requirement 1. M3. When a Reliability Directive is issued, demonstrate that it was not the result of a failure of the Reliability Coordinator, Transmission Operator, Balancing Authority, Generator Operator or Distribution Provider to repeat, restate, rephrase, or recapitulate an Operating Instruction, when required by another Reliability Coordinator, Transmission Operator or Balancing Authority.
No
Individual
Kenneth A Goldsmith
Alliant Energy
Agree
MRO NSRF
Individual
Andrew Z. Pusztai

American Transmission Company, LLC
Yes
<p>And ATC supports the communication protocols identified in R1. However, ATC proposes changing R2 and R3 to make the protocols for issuing and receiving Operational Instructions consistent with the protocols for issuing and receiving Reliability Directives as defined in R2 and R3 of proposed Reliability Standard COM-002-3 as follows: R2. When instructed by a Balancing Authority, Reliability Coordinator, or Transmission Operator to repeat, restate, rephrase, or recapitulate an Operational Instruction, each Balancing Authority, Transmission Operator, Generator Operator, or Distribution Provider, that is the recipient of a Operational Instruction, shall repeat, restate, rephrase, or recapitulate the Operational Instruction. R3. Each Reliability Coordinator, Transmission Operator, and Balancing Authority that issues a Operational Instruction shall either: • Confirm that the response from the recipient of the Operational Instruction (in accordance with Requirement R2) was accurate, or • Reissue the Operational Instruction to resolve a misunderstanding. Each Balancing Authority, Reliability Coordinator, and Transmission Operator shall implement its communication protocols developed in Requirement R1 in a manner which identifies and corrects deficiencies in said communication protocols.</p>
Individual
John Bee
Exelon and its affiliates
Yes
<p>Exelon supports COM-003 Draft 6 but would like to submit the following comments for consideration by the SDT: Suggest rewording the last sentence of M2 to read: A Balancing Authority, Reliability Coordinator, and Transmission Operator shall coordinate with another Reliability Coordinator, Balancing Authority and Transmission Operator to provide this evidence. Suggest rewording the last sentence of M3 to read: A Balancing Authority, Generator Operator, Distribution Provider, and Transmission Operator shall coordinate with a Reliability Coordinator, Balancing Authority and Transmission Operator to provide this evidence.</p>
Individual
Ryan Walter
Tri-State Generation and Transmission Association, Inc.
No
<p>We appreciate the drafting team’s efforts and persistence in the drafting of this new standard. We believe that this proposal goes beyond what was contemplated in the Blackout Recommendation as well as FERC Order 693 directives 1 and 3 of paragraph 540. We urge the drafting team to reconsider the need for a new COM-003 standard, we already have a standard</p>

for communication (COM-002), the requirements of the FERC Order can be added to COM-002 with minimal effort reducing the need for yet another standard. Additionally, we feel that a new term to define "Operating Instruction" is not warranted or required to fulfill either the FERC directive or Blackout Recommendations.

No

No, we believe that the minimal changes to address the FERC directives and Blackout Recommendations should be included as a revision to COM-002, not in a new Standard. Additionally, the requirements to develop and document protocols were not contemplated or warranted in either the FERC Directives or the Blackout Recommendations. We recommend that the drafting team reconsider their decision to develop a new COM-003 and investigate incorporating the requirements into the existing COM-002.

Group

DTE Electric

Kathleen Black

Agree

DTE Electric

Group

Florida Municipal Power Agency

Frank Gaffney

No

Although FMPA voted affirmative, there are still significant improvements that can be made, and enough significant weaknesses remain to make this a difficult voting decision for FMPA. It still artificially separates COM-002-3 and Reliability Directives and COM-003-1 and Operating Instructions when in reality Reliability Directives (RD) are a subset of Operating Instructions. Contrary to the white paper, there will likely be confusion as to whether an instruction should or should not be a Reliability Directive, i.e., the only real difference is whether an Emergency condition exists or not. The only certain distinguishing factor in practice is that the issuer of an RD needs to identify it as an RD per COM-002-3. There will still be significant Monday morning quarterbacking after an event as to whether an Operating Instruction should have been issued as an RD or not, i.e., whether or not the issuer should have recognized an Emergency or not. The better solution is to treat RD and Operating Instructions the same and only differentiate with VRFs (as an analogy, look at difference between R1 and R2 of FAC-003-2) and whether there should be a difference in treatment regarding "zero tolerance" for RDs and some tolerance for Operating Instructions. Reliability Directives on "all-calls" are still a problem It still makes 3-part communication optional for Operating Instructions. Does "optional" meet FERC's directive, i.e." requires tightened communications protocols, especially for communications during alerts and emergencies" (Order 693, P 540) and "(w)e also believe an integral component in tightening the protocols is to establish communication uniformity as much as practical on a continent-wide basis ... This is important because the Bulk- Power System is so tightly interconnected that system impacts often cross several operating entities' areas."

(Order 693, P 532)? At minimum, the standard should require 3-part communication for alerts in addition to Emergencies. R2 and R3 try to limit potential violations for failure to follow the subject of the requirement (i.e., R2: “Each (responsible entity) shall implement its communication protocols developed in Requirement R1”) would not actually result in a violation unless an Emergency occurred as described in the predicate, (e.g., R2: “so that the failure to use the protocols by the issuer of an Operating Instruction does not result in an operating condition that requires the issuance of a Reliability Directive ....”). Remember, Reliability Directives are only given in a state of Emergency (Reliability Directive: “A communication initiated by a Reliability Coordinator, Transmission Operator, or Balancing Authority where action by the recipient is necessary to address an Emergency or Adverse Reliability Impact”). Does this serve reliability well, must we get to a state of Emergency to have a violation to the standard – and doesn’t that just highlight potential double jeopardy and overlap between COM-002-3 and COM-003-1, e.g., if an Operating Instruction is issued in COM-003-1 that is not followed that results in the same instruction being given as a Reliability Directive? This of course begs the question of whether or not the System Operator should have issued an RD in the first place. Does this address FERC’s requirement to tighten communication protocols, including emergencies and alerts? In addition, we don’t think the actual language limits the potential violations to those that meet the predicate as intended (i.e., we do not think the predicate – “so that ...” – modifies the subject so much as it describes and repeats the purpose of the standard. In other words, to us the requirements can be interpreted that the subject must always be met “so that” the purpose/predicate is accomplished. Hence, we do not think that it solves the zero tolerance issue without stating the requirement in a similar manner as the Measure is stated). Note that the Measure confirms that an Emergency is intended for potential violation: “Each (responsible entity) shall provide evidence that it did not issue an Operating Instruction that resulted in an operating condition that required the issuance of a Reliability Directive ...”. We still strongly believe that the better solution is to cause COM-003-1 to address Reliability Directives and retire COM-002-3. After all, when issuing a Reliability Directive, don’t we want the issuer to speak English, use a consistent clock time with their neighbors, etc., for which COM-002-3 is silent but COM-003-1 specifies? We still have not heard a good reason why this is not being done. We also think that it is necessary to require 3-part communication for “alerts” to meet FERC’s directives. Don’t we want 3-part communication to be followed during alerts?

Individual

John Brockhan

CenterPoint Energy Houston Electric LLC.

No

No

As stated in its Draft 5 comments, CenterPoint Energy firmly believes there should be no High or Severe VSL for simply failing to document a process, protocol, or procedure. It is

counterintuitive to allow for a scenario where an entity's System Operators are communicating effectively and correctly and yet that has the entity penalized with the highest severity level for not having the appropriate documentation. Additionally, CenterPoint Energy disagrees with the assignment of Severe VSL for R3, when a comparable violation in COM-002-3 R2 is also a Severe VSL. The VSL for failing to repeat an O.I. and for failing to repeat an R.D. should not be the same. CenterPoint Energy also has concerns with the following two aspects of Draft 6: 1. CenterPoint Energy disagrees with R1's stipulation that the RC must approve the BA's and the TOP's communication protocols, especially given the SDT's assertion that a possible outcome is for the RC to unilaterally develop the protocols and impose them on the BA and the TOP. Instead, CenterPoint Energy recommends that R1 be modified to state "Each Reliability Coordinator shall develop, and each Balancing Authority and Transmission Operator shall develop collaboratively with the Reliability Coordinator, documented communication protocols..." 2. CenterPoint Energy appreciates the efforts of the SDT to revamp COM-003-1 so that its Operating Instruction is compartmentalized from COM-002-3's Reliability Directive, effectively reducing the industry's compliance burden. However, the revision does not ease a System Operator's practical operational burden of having to distinguish in real-time whether a command that is about to be issued is an O.I. or an R.D. Rather than focusing solely on maintaining the integrity of the BES, an Operator may now be distracted by what to label that command and the consequences of assigning the incorrect label. The industry and NERC have been working on the proposed COM-003 standard for nearly four years, ever since the posting of draft 1 in 2009. The proposed standard is now at draft 6, and it is becoming apparent that the industry is struggling to achieve consensus on the specifications for COM-003. Furthermore, it's been more than nine years since the release of the Blackout Report and six years since Order 693. In that interim, the industry has improved and evolved in numerous areas, including operator communication effectiveness. Most of all, the industry and NERC have already approved COM-002-3 and its associated definition of Reliability Directive, which, once enforceable, will undoubtedly further tighten communication. Perhaps it is time then for NERC and the industry to start a dialogue with FERC to reevaluate the purpose and the need for COM-003 and to request from FERC refreshed, clear guidance on this subject.

Individual

Stanley T Rzad

Keys Energy Services

Agree

Florida Municipal Power Agency

Individual

Scott Berry

Indiana Municipal Power Agency

There is no place to submit "other" comments, so Indiana Municipal Power Agency (IMPA) is submitting comments under this question. For requirement R3, how will entities (BA, TOP,

GOP, and DP) who are responsible for the repeat back of the Operating Instruction know the “when required by the issuer” part of the requirement is in place or being required by the issuer? Will the issuer be stating their request is an Operating Instruction or be asking for the receiver to please repeat the Operating Instruction back to them? Maybe the issuer of the Operating Instruction can make their communication protocol available to the receiving entities in Requirement R3 to allow them to be familiar with their protocols which may help with know when a repeat back is required by the issuer.

Individual

Daniel Mason

HHWP

No

The draft standard does not clearly articulate the purpose nor an appropriate results based approach to addressing FERC objective to ensure clear communications between operators and users of the BES.

Group

Bureau of Reclamation

Erika Doot

No

The Bureau of Reclamation believes that the proposed changes to COM-003-1 do not adequately address Order 693 directives or 2003 Blackout Report Recommendation No. 26. First, Order 693 Paragraph 512 directed the ERO to modify COM-002-2 to address “both normal and emergency operations,” and because each Transmission Operator (TOP), Balancing Authority (BA), and Reliability Coordinator (RC) is able to design their own Operating Instructions under R1 of the proposed revision, Reclamation is unable to ascertain whether Operating Instructions will apply to normal operations. Second, Paragraph 532 of Order 693 specified that “an integral component in tightening [communication] protocols is to establish communication uniformity as much as practical on a continent-wide basis.” As written, R1 would allow each BA and TOP to develop their own Operating Instructions, which does not promote the continent-wide uniformity called for by FERC in Order 693. Third, the 2003 Blackout Report Recommendation No. 26 specified that NERC should improve internal and external communications during “alerts, emergencies, or other critical situations.” Under the proposed definition of Operating Instruction and R1, it seems that BAs and TOPs have discretion to determine under what conditions Operating Instructions are issued in their operating area, so it is not possible for Reclamation to determine whether Recommendation No. 26 is adequately addressed by the standard. In addition, Reclamation would like to emphasize that the revised definition of Operating Instruction is not clear enough to distinguish between real-time operations coordination (“discussion of general information and potential options?”), Operating Instructions (applicable in circumstances as defined by various TOPs and

BAs), and Reliability Directives (real-time emergency conditions addressed by COM-002). COM-003 does not clearly define the timeframe for Operating Instructions, and should make clear what the line of demarcation is between “real-time emergency” communications governed by COM-002 and other alert conditions governed by COM-003. If each BA and TOP is allowed to define separate circumstances under which “Operating Instructions” apply, Reclamation believes that COM-003 will not achieve continent-wide standardization of communications protocol that FERC recommended in Order 693. Also, Reclamation does not believe that violations of R3 should be tied to a failure to repeat an Operating Instruction only if it “result[s] in an operating condition that required the issuance of a Reliability Directive.” To reinforce the importance of repeat-back communications, repeat-back communications should be required under all circumstances like in the aviation industry. Further, Reclamation believes that Generator Operators (GOPs) and Distribution Providers should provide concurrence or have a role in Operating Instructions development required under R1 to avoid potential miscommunications (e.g., in nomenclature for Transmission interface elements). Lastly, Reclamation believes that COM-002 should include provisions parallel to IRO-001 and TOP-001 that allow Generator Operators to inform the TOP, BA, or RC that they are unable to comply with an Operating Instruction because the actions requested “would violate safety, equipment, regulatory or statutory requirements” so that the TOP, BA, or RC “can implement alternate remedial actions,” If the intent of the standard is to avoid Operating Instructions escalating to Reliability Directives, GOPs should be able to inform the TOP, BA or RC of their “inability to perform” the Operating Instruction like they are able to inform the TOP, BA, or RC of the inability to perform a Reliability Directive. The Bureau is proactive about assisting with transmission system events, but at certain times of year dramatic changes in reservoir levels could endanger the public in reservoirs or on rivers, could cause unlawful total dissolved gas (TDG) levels, or violate Endangered Species Act requirements. Other safety and equipment circumstances could also lead to an inability to follow an Operating Instruction. Reclamation suggests that the previous draft of the standard was clearer and that perhaps the drafting team could revisit it.

No

Reclamation does not believe that R3 should only be accompanied by a Severe Violation Severity Level (VSL), especially because BA and TOP “Operating Instruction” protocols could vary significantly among BAs and TOPS. Reclamation reiterates that if the intent of the standard is to avoid Operating Instructions escalating to Reliability Directives, GOPs should be able to inform the TOP, BA or RC of their “inability to perform” an Operating Instruction because it “would violate safety, equipment, regulatory, or statutory requirements” so that the Operating Instruction does not become a Reliability Directive. Reclamation suggests that the drafting team develop thresholds for failure to repeat that would amount to low, medium, high or severe violations.

Individual

Daniel Duff

Liberty Electric Power

Agree

Essential Power
Group
Hydro One Networks Inc.
Sasa Maljukan
No
<p>We support this proposed draft (version 6) of the standard on the basis of it being a compromise between what the industry would like to see and what the US regulator is mandating. That said, we still have concerns with the proposed standard (comment below). As proposed, the standard may be ambiguous and difficult to measure. For example, Requirement 2, states that the entity shall implement its communication protocols in such a way that failure to use them would not result in an operating condition that requires the issuance of a Reliability Directive. How does the SDT envision enforcing such requirement? It is difficult to determine if the failure to follow the protocols when addressing Operating Instructions is truly the reason for a new operating condition that requires issuance of a Reliability Directive or is the result of the original instruction being insufficient or in error. Also, the corresponding measure M2 puts the burden on the entities to provide evidence that it did not have any such cases. We see this as an ever encompassing and burdensome approach for collecting and presenting evidence. The issue of three-part communications has always been very central to the development of this standard. So far the SDT has not been able to produce a draft standard to achieve industry consensus on this issue. While at least partially addressing FERC orders, we believe that the approach the SDT chose, makes the day-to-day duties inside the control room more complicated, cumbersome and hard to implement. If the current version 6 does not achieve the required industry approval rate, we still stand by our prior comments and consideration should be given to modify the COM-002 standard to incorporate into it the matters that COM-003 has been trying to address, all in one communications standard.</p>
Yes
Group
FirstEnergy
Larry Raczkowski
Yes
<p>(1) FirstEnergy (FE) believes that Requirement 2 is confusing as worded, and as such, we propose the following for clarity: [R2. Each Balancing Authority, Reliability Coordinator, and Transmission Operator that issues an Operating Instruction shall follow its documented communication protocols developed in Requirement R1 such that it does not result in an operating condition that requires the issuance of a Reliability Directive by the original issuer of the Operating Instruction or by another Balancing Authority, Reliability Coordinator, or Transmission Operator.] (2) FE believes that clarity will also be attained with clear and precise RSAWs. The latest RSAW that has been posted is applicable to Draft 4 and provides no</p>

guidance to stakeholders the intent of the requirements from Draft 6. FE appreciates the FAQs from July 2, 2013 Industry Webinar the SDT has provided and would recommend the SDT incorporate into the RSAW for Requirement 2 the intent of the response to Question 2 regarding when an evaluation to an Operating Instruction shall be used as evidence.

Yes

Individual

John Seelke

Public Service Enterprise Group

Agree

Essential Power, LLC

Individual

Karen Webb

City of Tallahassee - Electric Utility

No

TAL has voted NO because the standard is still not “clear and unambiguous”. TAL is concerned at the degree to which the proposed standard complicates compliance for Operating Instructions without benefit to reliability. The FERC Directive was to tighten communications during Emergencies and Alerts. Operating Instructions deserve separate consideration under the standards. Requiring an entity’s procedure to be subject to the Reliability Coordinator’s approval creates an undue burden on the RC with no measurable improvement in reliability. While this addressed a commenter’s concerns over uniformity within RC control areas, it would be simpler and more efficient to have the RC create a procedure and provide it to all the entities in the footprint. Measure 3 should be changed to “when required by the issuer” in order to provide clarity and consistency with R3.

Group

DTE Electric

Kathleen Black

Agree

Individual

Scott Langston

City of Tallahassee

No

TAL has voted NO because the standard is still not “clear and unambiguous”. TAL is concerned at the degree to which the proposed standard complicates compliance for Operating

Instructions without benefit to reliability. The FERC Directive was to tighten communications during Emergencies and Alerts. Operating Instructions deserve separate consideration under the standards. Requiring an entity's procedure to be subject to the Reliability Coordinator's approval creates an undue burden on the RC with no measurable improvement in reliability. While this addressed a commenter's concerns over uniformity within RC control areas, it would be simpler and more efficient to have the RC create a procedure and provide it to all the entities in the footprint. Measure 3 should be changed to "when required by the issuer" in order to provide clarity and consistency with R3.

Individual

Philip Tice

Deseret Power Electric Cooperative

No

As written, R1 would allow each BA and TOP to develop their own Operating Instructions, which does not promote the continent-wide uniformity called for by FERC in Order 693. The revised definition of Operating Instruction is not clear enough to distinguish between real-time operations coordination ("discussion of general information and potential options"?), Operating Instructions (applicable in circumstances as defined by various TOPs and BAs), and Reliability Directives (real-time emergency conditions addressed by COM-002). COM-003 does not clearly define the time frame for Operating Instructions, and should make clear what the line of demarcation is between "real-time emergency" communications governed by COM-002 and other alert conditions governed by COM-003. If each BA and TOP is allowed to define separate circumstances under which "Operating Instructions" apply, Reclamation believes that COM-003 will not achieve continent-wide standardization of communications protocol that FERC recommended in Order 693. COM-003 should include provisions parallel to IRO-001 and TOP-001 that allow Generator Operators to inform the TOP, BA, or RC that they are unable to comply with an Operating Instruction because the actions requested "would violate safety, equipment, regulatory or statutory requirements" so that the TOP, BA, or RC "can implement alternate remedial actions," If the intent of the standard is to avoid Operating Instructions escalating to Reliability Directives, GOPs should be able to inform the TOP, BA or RC of their "inability to perform" the Operating Instruction like they are able to inform the TOP, BA, or RC of the inability to perform a Reliability Directive.

No

R3 should only be accompanied by a Severe Violation Severity Level (VSL), especially because BA and TOP "Operating Instruction" protocols could vary significantly among BAs and TOPS. If the intent of the standard is to avoid Operating Instructions escalating to Reliability Directives, GOPs should be able to inform the TOP, BA or RC of their "inability to perform" an Operating Instruction because it "would violate safety, equipment, regulatory, or statutory requirements" so that the Operating Instruction does not become a Reliability Directive. The drafting team should develop thresholds for failure to repeat that would amount to low, medium, high or severe violations.

Individual
Michael Lowman
Duke Energy
Yes
<p>Duke Energy agrees in part that draft 6 of the proposed COM-003-1 does address the recommendations of the 2003 Blackout Report, FERC Order 693, and the COM-003-1 SAR. However, Duke Energy believes that this draft has gone beyond the expectations outlined in the documents mentioned above. Measure 3 should be changed to “when required by the issuer” in order to provide clarity and consistency with R3. Requirement 2 language leads to uncertainty (risk) as to when an Operating Instruction will become a Reliability Directive. This could negatively impact BES reliability in creating reluctance, by the entity, to issue a Reliability Directive and furthermore places Operators in the position of acting in compliance with the Requirement at the time only to be deemed non-compliant later when circumstances change. This is an untenable position and leads to less reliability. Such a finding of non-compliance cannot be mitigated leaving the Responsible Entity without means to “control” performance. We are also concerned with the language in Requirement 2 “so that”. This vague language can be interpreted as to intent which is unmeasurable and therefore adds to the uncertainty (risk). In addition, Duke Energy believes that a statement needs to be added in R1 that includes providing or distributing those communication protocols developed by a BA or TOP to their associated DPs and GOPs. This would address a potential gap of DPs and GOPs not aware of the communication expectations when communicating with BAs and TOPs when given an Operating Instruction. Lastly, while Duke Energy applauds the efforts made by the SDT, we are not convinced that a standard can be developed that will garner the requisite support from industry stakeholders. Duke Energy recommends the SDT to delineate other options, such as a Guideline document or White Paper, before addressing the recommendations in the 2003 Blackout Report.</p>
No
<p>Duke Energy believes that the VSL(s) need to use the same language as in the standard requirements. In order to stay consistent with the VSL(s), we believe that “Functional Entities” should be replaced with “Responsible Entities” in the Applicability Section of this standard.</p>
Individual
Wryan Feil
Northeast Utilities
Yes
No
<p>Requirements R2 and R3 need to be written to clarify requirements. The current draft could result in differing interpretations.</p>
Individual

John Hagen

Pacific Gas and Electric Company

No

Pacific Gas and Electric believes that the proposed changes to COM-003-1 do not adequately address Order 693 directives or 2003 Blackout Report Recommendation No. 26. First, Order 693 Paragraph 512 directed the ERO to modify COM-002-2 to address "both normal and emergency operations," and because each Transmission Operator (TOP), Balancing Authority (BA), and Reliability Coordinator (RC) is able to design their own Operating Instructions under R1 of the proposed revision, PG&E is unable to ascertain whether Operating Instructions will apply to normal operations. Second, Paragraph 532 of Order 693 specified that "an integral component in tightening [communication] protocols is to establish communication uniformity as much as practical on a continent-wide basis." As written, R1 would allow each BA and TOP to develop their own Operating Instructions, which does not promote the continent-wide uniformity called for by FERC in Order 693. Third, the 2003 Blackout Report Recommendation No. 26 specified that NERC should improve internal and external communications during "alerts, emergencies, or other critical situations." Under the proposed definition of Operating Instruction and R1, it seems that BAs and TOPs have discretion to determine under what conditions Operating Instructions are issued in their operating area, so it is not possible to determine whether Recommendation No. 26 is adequately addressed by the standard. In addition, PG&E would like to emphasize that the revised definition of Operating Instruction is not clear enough to distinguish between real-time operations coordination ("discussion of general information and potential options?"), Operating Instructions (applicable in circumstances as defined by various TOPs and BAs), and Reliability Directives (real-time emergency conditions addressed by COM-002). COM-003 does not clearly define the timeframe for Operating Instructions, and should make clear what the line of demarcation is between "real-time emergency" communications governed by COM-002 and other alert conditions governed by COM-003. If each BA and TOP is allowed to define separate circumstances under which "Operating Instructions" apply, PG&E believes that COM-003 will not achieve continent-wide standardization of communications protocol that FERC recommended in Order 693. Also, PG&E does not believe that violations of R3 should be tied to a failure to repeat an Operating Instruction only if it "result[s] in an operating condition that required the issuance of a Reliability Directive." To reinforce the importance of repeat-back communications, repeat-back communications should be required under all circumstances like in the aviation industry. The use of three-way communication has been proven as an effective error prevention tool in the military, aviation, and in the nuclear power industry. It is time that the same discipline and rigor be implemented in the electric industry. The current version of this Standard is moving away from reliability and will be difficult for compliance and enforcement. Further, Generator Operators (GOPs) and Distribution Providers should provide concurrence or have a role in Operating Instructions development required under R1 to avoid potential miscommunications (e.g., in nomenclature for Transmission interface elements). PG&E suggests that the previous draft of the standard was clearer and that perhaps the drafting team could revisit it.

No
<p>PG&amp;E does not believe that R3 should only be accompanied by a Severe Violation Severity Level (VSL), especially because BA and TOP "Operating Instruction" protocols could vary significantly among BAs and TOPS. Reclamation reiterates that if the intent of the standard is to avoid Operating Instructions escalating to Reliability Directives, GOPs should be able to inform the TOP, BA or RC of their "inability to perform" an Operating Instruction because it "would violate safety, equipment, regulatory, or statutory requirements" so that the Operating Instruction does not become a Reliability Directive.</p>
Group
Puget Sound Energy
Denise Lietz
No
<p>Puget Sound Energy appreciates the drafting team's work to simplify the requirements of this standard and believes that the standard's language is moving in the right direction. However, Puget Sound Energy cannot vote to approve this standard for the following reasons. Requirement R1, by requiring the Reliability Coordinator (RC) to approve each communication protocol, is unnecessarily burdensome on the RC and all the entities that must receive that approval. This type of approval makes sense for restoration plans (EOP-005-2) because of the required coordination in an emergency situation, but not for the communications protocols that apply in non-emergency situations. There is certainly a benefit to uniformity of communication protocols within an interconnection; however, uniformity should be achieved by requiring the RC to specify its requirements for communication protocols and then requiring Balancing Authorities and Transmission Operators to comply with that specification (similar to the approach of IRO-010). There should be an additional requirement for Reliability Coordinators, Balancing Authorities and Transmission Operators to provide information about the communication protocol requirements that apply to other entities within their area to those entities. It is only appropriate to hold an entity responsible for complying with communication protocol requirements when it has advance notice of what those requirements will be. The language connecting miscommunications to Reliability Directives in requirements R2 and R3, along with the associated VSLs, should address degrees of compliance. While the approach does narrow the scope of possible violations, it seems that the language could easily lead to a debate on whether a miscommunication "results in" an impact. Typically, events have many elements that contribute to their occurrence and in some cases a miscommunication might only indirectly or tangentially relate to the event. Given the assigned VSL of severe for all violations of these requirements, a miscommunication with an indirect relationship to a subsequent Reliability Directive will likely have the same compliance impact as one that has a more direct and substantial relationship. Thank you for your consideration of these comments.</p>
Individual
Clay Young

SCE&G
No
<p>FERC Order 693 states "We also believe an integral component in tightening the protocols is to establish communication uniformity as much as practical on a continent-wide basis." R1 allows each BA, RC, and TOP to develop their own, separate communication protocols. Criteria 1.1 thru 1.5 are open-ended. As a result, each BA and TOP will have different protocols that they submit to the RC for approval. The standard does not give RCs guidance on how to evaluate submitted protocols for consistency/uniformity before approval. Without such guidance, it is unclear how consistency and uniformity will be promoted among the various BA/TOP documented protocols. Furthermore, if such criteria were added, the standard would still only promote uniformity within an RC footprint. It would not promote uniformity across the continent, as directed within Order 693, or even the regions. It seems the only way for the SDT to fully address the FERC directive, is for the SDT to specify the specific protocols they want BAs TOPs and RCs to use. Many entities are opposed to this approach because they are concerned about monitoring and maintaining compliance with such a standard. These concerns could be alleviated if the SDT writes the standard in a way such that a violation only occurs if a BES Emergency results from failure to use the specified protocols.</p>
Individual
Catherine Wesley
PJM Interconnection, L.L.C.
No
<p>PJM does not support Draft 6 of this standard. There is a concern specific to the potential, unintended compliance responsibility in R2 because of the way the requirement is written, as well as the associated M2. Applicable entities will be required to prove a negative which may result in unnecessary Root Cause Analysis (RCA) efforts that are not required and are solely performed to satisfy an administrative, compliance item, yet adds no discernible reliability value.</p>
Group
Santee Cooper
S. Tom Abrams
No
<p>Santee Cooper believes the issuing authority should specifically identify a communication as an Operating Instruction, thereby triggering the need for three-part communications, and the receiver to use three part.</p>
Yes

Group
Cooper Compliance Corp
Mary Jo Cooper
No
While we agree that the proposed Standard addresses the FERC Order 693, we do not feel that R3 is well drafted and assumes that the distribution provider or generator operator would be able to determine if the Operating Instruction would “result in an operating condition that requires the issuance of a Reliability Directive by the original issuer of the Operating Instruction or by another Balancing Authority, Reliability Coordinator, or Transmission Operator.” In addition, the dictionary term for restate, rephrase, or recapitulate all have the same meaning and it seems odd that an auditor would be able to distinguish any difference. We suggest the drafting team simplify R3 as follows: “Each Balancing Authority, Transmission Operator, Generator Operator and Distribution Provider shall repeat or restate an Operating Instruction when required by the issuer of an Operating Instruction.”
Yes
Individual
Brenda Hampton
Luminant Energy Company LLC
Yes
While draft 6 of COM-003-1 is largely acceptable, the wording of R3 may create confusion about what is required. R3 reads, in part: R3. Each Balancing Authority, Transmission Operator, Generator Operator and Distribution Provider shall repeat, restate, rephrase, or recapitulate an Operating Instruction when required by the issuer of an Operating Instruction in its communication protocols developed in Requirement R1 so ... This language suggests that the receiving entity must know what is in the issuer's communication protocol and repeat, restate, rephrase or recapitulate the Operating Instruction without any prompts from the issuer. If that is the case, then there needs to be a requirement that the developer of a communication protocol must provide that communication protocol to all relevant parties prior to implementation. However, after reading the Technical Justification, that doesn't appear to be the intent. Rather the intent is that the issuer will request the receiver to repeat the Operating Instruction back during the phone call. To make that clear, Luminant suggests the following language change to R3: R3. Each Balancing Authority, Transmission Operator, Generator Operator and Distribution Provider shall repeat, restate, rephrase, or recapitulate an Operating Instruction when requested by the issuer of an Operating Instruction in accordance with the communication protocols developed in Requirement R1 so ... With this change, we would be in support of this draft standard.
Yes

Group
IRC Standards Review Committee
Gregory Campoli
<p>The SRC has reviewed the current COM-003 posting and offer the following comments that augments previously provided comments on the standard. • Requirement R1 now requires each BA and TOP’s to have protocols approved by the RC. One question certain SRC Members have is whether the RC is being asked to “assess” whether the BA/TOP’s protocols are “compliant” with the Standard. Another question is whether the RC is being asked to “approve” the TOP communication protocols with other Registered Entities (e.g., TOs). Depending on the answers to these questions, the SRC proposes that the “approval” requirement could be revised to a “coordination” obligation. • Requirement R2 now has add a trigger for non compliance for not implementing the communications protocol if following an operating instruction, a reliability directive is issued to correct the problem caused by a failure to implement its communication protocol. We ask NERC to comment on whether this will produce an obligation for compliance authorities to begin a compliance investigation on every Reliability Directive to assess whether communication protocols were followed. Reliability Directives are an important means of communications to address all emergencies. Poor communications have yet to be clearly identified as a root cause. The SRC would also like NERC and the SDT to consider comments provided by NERC at the recent FERC Technical Conference stating, ‘complementary approaches should also be examined where the risks to reliability can effectively be mitigated through other means, such as through guidelines, data collection or other technical approaches.’ NERC should continue to consider the effectiveness of the NERC Operating Committee communications protocol. Note, ERCOT and PJM, members of the IRC Standards Review Committee did not join these joint comments and have submitted individual comments.</p>
Individual
Brett Holland
Kansas City Power & Light
No
We feel that this standard is not necessary if the COM-002 standard is properly followed. Also, R3 could cause an over burdensome amount of effort to prove compliance with COM-003.
No
Group
SPP Standards Review Group
Robert Rhodes

Yes
Although there still remain some concerns that the intent of Recommendation 26 was strictly for emergency situations which are covered by COM-002-3.
Yes
There were a couple of typos in the VSLs. R1 – Insert a space between ‘R1’ and ‘in’ in the Lower VSL. R3 – Insert ‘to’ between ‘failed’ and ‘repeat’ in the Severe VSL.
Individual
Kaleb Brimhall
Colorado Springs Utilities
No
<p>Colorado Springs Utilities appreciates the commitment and long, hard work of the Drafting Team as well as the opportunity to comment on this draft. R.1: The clause, “subject to the Reliability Coordinator’s approval” is unclear in its intent. If the intent is that the RC must review and approve all Communication Protocols, there should be discrete requirements (a la EOP-005-2 &amp; EOP-006-2) in the Standard. If that is not the explicit intent, what is? If the intent is to make it optional or suggested for the RC to review and approve Protocols, then that is not a Standard – it is a suggestion. Please state whatever is the intent clearly in the requirement. CSU proposes the clause be removed entirely. R1.3: Should be removed. This requirement is redundant to TOP-002-2.1b, R18; “Neighboring Balancing Authorities, Transmission Operators, Generator Operators, Transmission Service Providers and Load Serving Entities shall use uniform line identifiers when referring to transmission facilities of an interconnected network.” R2 &amp; R3: CSU prefers the language along the lines of the previous draft (R2 &amp; R4). The clause, “failure to use the protocols by the issuer of an (or R3- failure to repeat, restate, rephrase, or recapitulate the) Operating Instruction does not result in an operating condition that requires the issuance of a Reliability Directive” is unworkable, probably unauditible, and definitely an evidentiary nightmare. If one entity issues a Reliability Directive, what chain of evidence from how many other entities is required to prove that no other entity failed to use its communications protocols in such a way that failure resulted in the operating condition requiring the first entity to issue a Reliability Directive? Or, to view it from the other direction: if CSU is being audited on compliance with COM-003-1, how shall it prove that it did not have a failure to properly implement any communication protocol which then contributed to operating conditions which may have required any other reliability entity in the western interconnect to have to issue a Reliability Directive? How does one establish the causal relationship, or lack thereof? In lieu of a return to the previous draft’s language, CSU recommends adding another sub-part to R1, “R1.6 A method to assess System Operator’s communication practices and implement improvements as necessary to meet the expectations in its documented communications protocols developed for this Requirement.” Then R2 could be written, “Each ... shall implement its communication protocols developed in R1.” R3 could state, “Each ... shall repeat, restate, rephrase, or recapitulate an Operating Instruction, when required by the issuer in its communication protocols developed in requirement R1, to the</p>

satisfaction of the issuing System Operator.” M2 & M3: Reliability Standards need to get away from asking for negative evidence. The Standard is probably written incorrectly if negative evidence is required for compliance. Even sticking with the negative theme; “Each ... shall provide evidence that it did not fail to use its documented communications protocols developed for Requirement R1 in a way that resulted in an operating condition that required <anyone> to issue a Reliability Directive,” comes closer to supporting the Requirement as drafted. Thank you! Sincerely, Colorado Springs Utilities

Yes

No Comments

“...current comments and voting on behalf of DTE Electric Co. The vote is still negative and both Kent Kujala and Daniel Herring agree with this vote and comments.”

**Comments - Eizans:**

In response to request for comment number 1 and a literal reading of the question and associated documents:

The August 2003 Blackout Report Recommendation number 26 speaks to “tightening communication protocols, especially for communications during alerts and emergencies.” In the context of the entire document, it highlights the lack of sharing of critical information during the blackout event. It does not really address “Operating Instructions” or mention a failure to correctly understand, follow or execute a direction/instruction. The focus is on what information would have assisted the operators in dealing with the event, not mistakes in execution of Operating Instructions. Page 109 of the report summarizes “Effectiveness of Communications” and states “Under normal conditions, parties with reliability responsibility need to communicate important and prioritized information to each other in a timely way, to help preserve the integrity of the grid. This is especially important in emergencies. During emergencies, operators should be relieved of duties unrelated to preserving the grid. A common factor in several of the events described above was that information about outages occurring in one system was not provided to neighboring systems.” Information exchange seems to be the focus, not communication of Operating Instruction.

FERC Order 693 (which refers back to the Blackout Report) also requires tightening communication protocols “especially for communications during alerts and emergencies” to “establish communication uniformity” and “eliminate ambiguities.” The proposed standard is focused on Operating Instructions and lacks requirements regarding consistency in information sharing.

Regarding COM-003-1 SAR, the SAR states its’s scope is “to establish essential elements of communications protocols and communications paths such that operators and users of the North American bulk electric system will efficiently convey information and ensure mutual understanding. “ It also states that the purpose of the standard is “to ensure that effective

communication is practiced and delivered in clear language via pre-established communications paths among pre-identified operating entities.” Version 6 of COM-003-1 does not address Applicability number 1 “relay critical reliability-related information in a timely and effective manner.” It also does not address Applicability number 3: “requirements for entities that experience abnormal conditions to use pre-defined terms such as proposed in the “Alert Level Guideline” (attached) to communicate the operating condition to other entities that are in a position to either assist in resolving the operating situation condition or to entities that are impacted by the operating condition.” It only focuses on Operating Instructions, not communication of the status/condition of the electrical system. The SAR Scope mentions “consistency across regions,” yet the standard does not address RC to RC communications within/across regions.

The purpose of COM-003-1 revision 1 was closer to addressing the above than the purpose in revision 6. It seems the standard has strayed from the intent and although there may be value in having a standard that addresses protocols for issuance of Operating Instructions, this version does not address the concerns laid out in the documents listed above. Items such as sharing of tie line trips, major generation loss trips, high risk situations/evolutions (possibly tripping critical items), loss of EMS capabilities/control center functionality, declared alerts/emergencies and other pertinent information would be the types of information would be standardized and addressed in a standard in order to meet the objectives of the SAR and FERC rather than Operating Instructions.

General comments regarding revision 6 of the standard “as written,” the purpose of which is different from the question asked in the comment form:

As this standard seems to focus on verbal communication, written communications should not be included this standard. It is not clear what is intended to be in scope for “written” Operating Instruction. The standard should not introduce vague terminology subject to different interpretations. If there is a need (or reliability reason) to address written Operating Instructions, they should be included in a separate standard. Focus on 3-way communication and use of alpha-numeric clarifiers in COM-003-1 do not readily fit written communications. Not sure how R2 and R3 would be applied to written Operating Instruction.

Since COM-003-1 has emphasized the difference between Operating Instruction and Reliability Directive as exclusive and distinct, it appears that COM-003-1 communication protocols are more strict for Operating Instruction (regarding use of time zone, alpha-numeric clarifiers, etc.) than COM-002-3 requiring only 3-way communication (no time zone, etc.). If COM-003-1 protocols (other than 3-way communication) are not followed for Reliability Directives, there is no standard violation of either COM-002-3 or COM-003-1. This seems to leave a reliability gap.

Should NOT require RC approval of an entity’s communication protocol. By requiring RC approval of each responsible entity’s communication protocol document, it sets up the possibility of disagreements. Entities should be responsible to develop protocols that are compatible with RC protocols, but that may differ on the “downstream” side (i.e. with entity’s

field personnel). This may be required if RC demands use of Standard Time and BA must communicate with field personnel in Daylight Time. RC should not be able to dictate these types of issues. No defined resolution process in cases of disagreement. If RC is final word, then standard should require RC to develop protocol with input from other entities and all entities should use RC protocol (no requirement for individual protocols). Who would “approve” RC to RC communication protocols?

R2 and R3 documentation is onerous. It really requires a coordinated investigation into every Reliability Directive that is issued to verify it was NOT caused by a communication protocol violation somewhere in the chain (as it may not be between just two responsible entities/protocol documents).

How wide a net needs to be cast in gathering attestations of “No Reliability Directives issued?” How deep in connected systems or entities? An entity may issue a Reliability Directive to a different entity than violated the communication protocol if that problem surfaces in their system.

**Comments - Stefaniak:**

R1.1, R 1.2, R1.3: It is not clear what is intended to be in scope for “written” Operating Instruction. The standard should not introduce vague terminology subject to different interpretations.

R2, R3: Failing to use communication protocols would not directly lead to an operating condition that requires the issuance of a Reliability Directive. It is more likely that failing to use communication protocols could cause an Operating Instruction to be incorrectly executed. Such an error could lead to an operating condition that requires the issuance of a Reliability Directive. Consider changing R2 and R3 as follows:

R2. Each Balancing Authority, Reliability Coordinator, and Transmission Operator shall implement its communication protocols developed in Requirement R1 so that the failure to use the protocols by the issuer of an Operating Instruction does not result in an Operating Instruction to be incorrectly executed thus leading to an operating condition that requires the issuance of a Reliability Directive by the original issuer of the Operating Instruction or by another Balancing Authority, Reliability Coordinator, or Transmission Operator. [Violation Risk Factor: Medium][Time Horizon: Real Time Operations ]

R3. Each Balancing Authority, Transmission Operator, Generator Operator and Distribution Provider shall repeat, restate, rephrase, or recapitulate an Operating Instruction when required by the issuer of an Operating Instruction in its communication protocols developed in Requirement R1 so that the failure to repeat, restate, rephrase, or recapitulate the Operating Instruction does not result in an Operating Instruction to be incorrectly executed thus leading to an operating condition that requires the issuance of a Reliability Directive by the original issuer of the Operating Instruction or by another Balancing Authority, Reliability Coordinator, or Transmission Operator. [Violation Risk Factor: Medium][Time Horizon: Real Time Operations ]