

Consideration of Comments on First Draft of SAR for Operating Personnel Communications Protocols

The Operating Personnel Communications Protocols SAR requesters thank all commenters who submitted comments on Draft 1 of the Communications Protocols SAR. This SAR was posted for a 30-day public comment period from March 15 through April 17, 2007. The requesters asked stakeholders to provide feedback on the standard through a special standard Comment Form. There were 23 sets of comments, including comments from 69 different people from more than 45 companies representing 9 of the 10 Industry Segments as shown in the table on the following pages.

Based on the comments received, the drafting team is recommending the SAR be submitted to the Standards Committee for authorization to proceed to the standard drafting step. The SAR was not materially changed. The description of the SAR scope was re-written to convey the intent of the standard more clearly.

In this “Consideration of Comments” document stakeholder comments have been organized so that it is easier to see the responses associated with each question. All comments received on the standards can be viewed in their original format at:

http://www.nerc.com/~filez/standards/Op_Comm_Protocol_Project_2007-02.html

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Director of Standards, Gerry Adamski, at 609-452-8060 or at gerry.adamski@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

¹ The appeals process is in the Reliability Standards Development Procedure manual: <http://www.nerc.com/standards/newstandardsprocess.html>.

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The Industry Segments are:

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

	Commenter	Organization	Industry Segment											
			1	2	3	4	5	6	7	8	9	10		
1.	Anita Lee (G1)	AESO		✓										
2.	Fred Waites (G6)	Alabama Power Company			✓									
3.	Ken Goldsmith (G3)	ALT												✓
4.	Jeff Hackman	Ameren Services	✓											
5.	Jason Shaver	American Transmission Co.	✓											
6.	Dave Rudolph (G3)	BEPC												✓
7.	Susan Renne	BPA	✓											
8.	Brent Kingsford (G1)	CAISO		✓										
9.	Ed Thompson (G4)	ConEd	✓											
10.	CJ Ingersoll	Constellation			✓									
11.	Michael Gildea (G4)	Constellation Energy						✓						
12.	Ed Davis	Entergy Services, Inc.	✓											
13.	Coleen Frosch	ERCOT		✓										
14.	Steve Myers (G1)	ERCOT		✓										
15.	David Folk	FirstEnergy Corp.	✓		✓			✓	✓					
16.	Dick Pursley (G3)	GRE												✓
17.	David Kiguel (G4)	Hydro One Networks	✓											
18.	Roger Champagne (I) (G4)	Hydro-Québec TransÉnergie (HQT)	✓											
19.	Ron Falsetti (I) (G1) (G4)	IESO		✓										
20.	Matt Goldberg (G1)	ISO-NE		✓										
21.	Kathleen Goodman (I) (G4)	ISO-NE		✓										
22.	William Shemley (G4)	ISO-NE		✓										
23.	Brian Thumm	ITC Transco	✓											
24.	Jim Cyrulewski (G2)	JDRJC Associates										✓		
25.	Mike Gammon	KCPL	✓											

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	Commenter	Organization	Industry Segment											
			1	2	3	4	5	6	7	8	9	10		
26.	Eric Ruskamp (G3)	LES												✓
27.	Donald Nelson (G4)	MA Dept. of Tel. and Energy											✓	
28.	Robert Coish (I) (G3)	Manitoba Hydro	✓		✓			✓	✓					
29.	Tom Mielnik (G3)	MEC												✓
30.	Terry Bilke (G2) (G3)	MISO		✓										
31.	William Phillips (G1)	MISO, SERC, MRO		✓										
32.	Carol Gerou (G3)	MP												✓
33.	Michael Brytowski (G3)	MRO												✓
34.	Randy Macdonald (G4)	NBSO		✓										
35.	Herb Schrayshuen (G4)	NGRID	✓											
36.	Michael Ranalli (G4)	NGRID	✓											
37.	Michael Schiavone (G4)	NGRID	✓											
38.	Guy V. Zito (G4)	NPCC												✓
39.	Alan Boesch (G3)	NPPD												✓
40.	Murale Gopinathan (G4)	NU	✓											
41.	Mike Calimano (I) (G1)	NYISO		✓										
42.	Greg Campoli (G4)	NYISO		✓										
43.	Al Adamson (G4)	NYSRC												✓
44.	Alicia Daugherty (G1)	PJM		✓										
45.	Phil Riley (G5)	Public Service Commission of SC											✓	
46.	Mignon L. Clyburn (G5)	Public Service Commission of SC											✓	
47.	Elizabeth B. Fleming (G5)	Public Service Commission of SC											✓	
48.	G. O'Neal Hamilton (G5)	Public Service Commission of SC											✓	
49.	John E. Howard (G5)	Public Service Commission of SC											✓	
50.	Randy Mitchell (G5)	Public Service Commission of SC											✓	
51.	C. Robert Moseley (G5)	Public Service Commission of SC											✓	
52.	David A. Wright (G5)	Public Service Commission of SC											✓	
53.	Roman Carter (G6)	Southern Company Transmission	✓											
54.	Marc Butts (G6)	Southern Company Transmission	✓											
55.	J.T. Wood (G6)	Southern Company Transmission	✓											

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Commenter		Organization	Industry Segment											
			1	2	3	4	5	6	7	8	9	10		
56.	Jim Busbin (G6)	Southern Company Transmission	✓											
57.	Jim Griffith (G6)	Southern Company Transmission	✓											
58.	Charles Yeung (G1)	SPP		✓										
59.	Ron Taylor	SRP	✓											
60.	Jim Haigh (G3)	WAPA												✓
61.	Neal Balu (G3)	WPS												✓
62.	Pam Oreschnik (G3)	Xcel												✓
63.	David Lemmons (G2)	Xcel Energy							✓					
64.	Nancy Bellows (G7)	WAPA												✓
65.	Mike Gentry (G7)	SRP												✓
66.	Bob Johnson (G7)	Xcel (PSC)												✓
67.	Frank McElvain (G7)	RDRC												✓
68.	Greg Tillitson (G7)	CMRC												✓
69.	Howard Rulf	We Energies			✓	✓	✓							

I – Indicates that individual comments were submitted in addition to comments submitted as part of a group

G1 – IRC Standards Review Committee (IRC SRC)

G2 – Midwest Standards Collaboration Group (Midwest SCG)

G3 – MRO Members

G4 – NPCC CP9 Reliability Standards Working Group (NPCC CP9)

G5 – Public Service Commission of South Carolina

G6 – Southern Company Transmission

G7 – WECC Reliability Coordination Comments Work Group (WECC RCCWG)

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- 4. The SAR includes a list of standards that include requirements that involve the issuing or receipt of real-time communications. If you are aware of additional requirements, beyond those listed on pages 8-9, please identify them here.21
- 5. Please provide any other comments (that you have not already provided in response to the first four questions on this form) that you have on the revised SAR.....22

Consideration of Comments — SAR for Operating Personnel Communications Protocols

1. Do you believe that there is a reliability-related need to establish a set of communications protocols to improve situational awareness and shorten response time? If "No," please explain why.

Summary Consideration: The majority of comments indicate that there is a reliability need for this SAR. Many comments took issue with the phrase "pre-defined scripts" and the SAR DT has re-written the SAR scope description to clarify that it is not the intent of the standard to require an extensive list of scripts to be used for all operating conditions. The SAR DT intent is for the Standard DT to develop requirements for communications protocols that include essential elements such that when applied, information is efficiently conveyed and mutually understood.

Question #1			
Commenter	Yes	No	Comment
Ameren Services	<input checked="" type="checkbox"/>		
BPA	<input checked="" type="checkbox"/>		
Entergy Services	<input checked="" type="checkbox"/>		
ERCOT	<input checked="" type="checkbox"/>		
FirstEnergy	<input checked="" type="checkbox"/>		
IESO	<input checked="" type="checkbox"/>		
IRC SRC	<input checked="" type="checkbox"/>		
ITC Transco	<input checked="" type="checkbox"/>		
Manitoba Hydro	<input checked="" type="checkbox"/>		
Midwest SCG	<input checked="" type="checkbox"/>		
MRO Members	<input checked="" type="checkbox"/>		
PSC of South Carolina	<input checked="" type="checkbox"/>		
WECC RCCWG	<input checked="" type="checkbox"/>		
We Energies	<input checked="" type="checkbox"/>		
<p>Response: The SAR DT acknowledges the commenters' affirmative response to this question and appreciates their submission.</p>			

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Question #1			
Commenter	Yes	No	Comment
ATC LLC	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The SAR needs further clarification before it is moved into the next stage. The SAR should identify at a minimum the words and procedures that the SDT is going to consider for a reliability standard.
<p>Response: The SAR's detailed description was revised to delete the sentence that indicated the standard would require scripts to be used. The SAR DT's intent is for the standard to require that communications include essential elements or protocols such that information is efficiently conveyed and mutually understood.</p>			
Constellation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	ECD believes there is a reliability reason for establishing a set of communication protocols.
<p>Response: The SAR DT acknowledges the commenter's affirmative response to this question and appreciates its submission.</p>			
Hydro-Québec TransÉnergie	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	HQT supports establishing communication protocols to define consistent emergency determinations. However, the standard should not extend to establishing pre-defined scripts that operators must follow in their communications without the element of judgment and discussion that are needed in such situations.
<p>Response: The SAR's detailed description was revised to delete the sentence that indicated the standard would require scripts to be used. The SAR DT's intent is for the standard to require that communications include essential elements or protocols such that information is efficiently conveyed and mutually understood.</p>			
ISO-NE	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	ISO New England supports establishing communication protocols to define consistent emergency determinations. However, the standard should not extend to establishing pre-defined scripts that operators must follow in their communications without the element of judgment and discussion that are needed in such situations.
<p>Response: The SAR's detailed description was revised to delete the sentence that indicated the standard would require scripts to be used. The SAR DT's intent is for the standard to require that communications include essential elements or protocols such that information is efficiently conveyed and mutually understood.</p>			
NPCC CP9	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	NPCC participating members agree with the need to establish communication protocols

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Question #1			
Commenter	Yes	No	Comment
			to define consistent emergency determinations. However, the standard should not extend to establishing pre-defined scripts that operators must follow in their communications without the element of judgment and discussion that are needed in such situations.
<p>Response: The SAR’s detailed description was revised to delete the sentence that indicated the standard would require scripts to be used. The SAR DT’s intent is for the standard to require that communications include essential elements or protocols such that information is efficiently conveyed and mutually understood.</p>			
NYISO	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	See comments in Question #2.
<p>Response: The SAR’s detailed description was revised to delete the sentence that indicated the standard would require scripts to be used. The SAR DT’s intent is for the standard to require that communications include essential elements or protocols such that information is efficiently conveyed and mutually understood.</p>			
Southern Company Transmission	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<p>If all Owners, Operators, and Users of the Bulk Electric system adhered to the current NERC standards (and previous Operating Policies), we do not believe this standard would be necessary. However, we understand that this SAR is an attempt to make it very clear what is expected of a RC, TOP, BA, GO, and DP in way of communciations during emergency situations.</p> <p>We feel that this communication protocol should be only applicable under the current EEA Level 1 and above state or with the new Transmission Emergency state currently being developed.</p>
<p>Response: The SAR DT believes that communications protocols that enable information to be efficiently conveyed and mutually understood are necessary under all operating conditions and not only during emergency or abnormal operating conditions.</p>			
KCPL		<input checked="" type="checkbox"/>	Not to the extent this SAR is addressing itself. The Black Out Report is overly broad and vague regarding this issue. This SAR would make more sense if it were addressing itself to tightening existing protocols and documenting them between entities. The way this SAR has been presented, pre-defined terms would have to be developed. Who would be responsible to determine what these pre-defined terms would be and would the terms be applicable to all operating entities? Adjacent operating entities have a long history of

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Question #1			
Commenter	Yes	No	Comment
			communicating and differing terms are understood.
<p>Response: The SAR's detailed description was revised to delete the sentence that indicated the standard would require scripts to be used. The SAR DT's intent is for the standard to require that communications include essential elements or protocols such that information is efficiently conveyed and mutually understood.</p>			

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2. Do you agree with the scope of the proposed standard? If “No,” please explain why

Summary Consideration: Many commenters expressed concern with “pre-defined scripts”. The SAR DT did not intend to prescribe scripts for all possible conditions, and the SAR DT has re-written the SAR’s description to clarify that it is not the intent of the standard to require an extensive list of scripts to be used for all operating conditions but rather for the Standard DT to develop requirements for communications protocols that include essential elements such that when applied, information is efficiently conveyed and mutually understood.

There was a comment that the standard should apply to “local control centers”. The SAR DT noted that although the system operators who work in local control centers operate under the direction of a TOP or RC, the local control center is typically owned and operated by the Transmission Owner. The SAR DT has added the functional entity of Transmission Owner as an applicable entity to give the standard DT maximum flexibility to do their work.

Question #2			
Commenter	Yes	No	Comment
BPA	<input checked="" type="checkbox"/>		
Entergy Services	<input checked="" type="checkbox"/>		
FirstEnergy	<input checked="" type="checkbox"/>		
PSC of South Carolina	<input checked="" type="checkbox"/>		
<p>Response: The SAR DT acknowledges the commenters’ affirmative response to this question and appreciates their submission.</p>			
Southern Company Transmission	<input checked="" type="checkbox"/>		As mentioned in the answer to question #1, we feel it should be applicable for EEA Level 1 and above or with the new Transmission Emergency state currently being developed.
<p>Response: The SAR DT believes that communications protocols that enable information to be efficiently conveyed and mutually understood are necessary under all operating conditions and not only during emergency or abnormal operating conditions.</p>			
Constellation	<input checked="" type="checkbox"/>		CECD agrees with the scope, however, CECD would caution that pre-defined action in response to grid operations would need to be broad enough to allow the flexibility that is required by a diverse system. The statement that raises this concern in the Scope is the first sentence which states, the scope of the proposed standard or revised standards is to establish a common lexicon of communications protocols and communication paths

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Question #2			
Commenter	Yes	No	Comment
			such that all operators and users of the North American bulk electric system have the same understanding as to its meaning, usage and take pre-determined action in response. The standard should focus on the communication paths, per-determined contacts (regular communication/testing), the applicable language and the terminology but not necessarily a specific action.
<p>Response: The SAR's detailed description was revised to delete the sentence that indicated the standard would require scripts to be used. The SAR DT's intent is for the standard to require that communications include essential elements or protocols such that information is efficiently conveyed and mutually understood.</p>			
WECC RCCWG	<input checked="" type="checkbox"/>		While the WECC RCCWG agrees in general with the scope of the proposed standard, the work group has some questions and comments regarding terms used in the scope. The scope of the SAR may be widened to "establish and implement a lexicon of communications protocols and communications paths." Please define "communication path" as used in the scope - is this the expected communications between entities as opposed to the actual physical paths of those communications? Additionally, there is a general comment that establishment of a lexicon does not, in itself ensure pre-determined action as noted in the scope. What type of pre-determined actions are expected, operating or communications?
<p>Response: The SAR DT defines communications path as the means/method used to communicate. The SAR DT does not intend to prescribe which means/method to use but that one is in place. Pre-determined actions are previously agreed upon communication actions taken in response to specific operating conditions.</p>			
Hydro-Québec TransÉnergie	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	See response to Question #1.
IESO	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	The scope of the SAR is too broad and too prescriptive. The Applicability section of the SAR where it states "... the protocol shall define a rigorous script for the Sender and Receiver of information..." is too prescriptive yet not exhaustive enough to cover all situations. We support the notion of defining standard terms to be used in operation personnel communication, but do not believe predetermined script is required in every communication situation, nor do we think it is possible to have a set of scripts that covers all possible cases.
ISO-NE	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	See response to Question #1.
NPCC CP9	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	See our comments to Question #1.

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Question #2			
Commenter	Yes	No	Comment
<p>Response: The SAR’s detailed description was revised to delete the sentence that indicated the standard would require scripts to be used. The SAR DT’s intent is for the standard to require that communications include essential elements or protocols such that information is efficiently conveyed and mutually understood.</p>			
Ameren Services		<input checked="" type="checkbox"/>	<p>There is no doubt that during alerts and emergencies, both parties in communication require a common definition. To the extent the standard requires neighboring BAs, TOs and RCs to use the same word with the same meaning, then the scope of the proposed standard makes sense. However, as written the standard appears to indicate the kind of scripting that is better suited to selling magazines from a boiler room. No defined protocol can match every situation. And if in fact that was even a goal, the operators would have the time-consuming task of identifying which script currently was needed when their time would be better spent resolving the situation.</p> <p>The SAR also proposes that any reliability impacts beyond a Reliability Coordinator's area must be coordinated and approved by the impacted Reliability Coordinator. Clearly, if time permits, this coordination is appropriate. However, in an emergency, the RC may have to use independent judgment.</p>
<p>Response: The SAR’s detailed description was revised to delete the sentence that indicated the standard would require scripts to be used. The SAR DT’s intent is for the standard to require that communications include essential elements or protocols such that information is efficiently conveyed and mutually understood.</p> <p>The coordination between RC and TOP/BA is addressed in a separate project 2006-6 Reliability Coordination and is not part of this SAR.</p>			
ATC LLC		<input checked="" type="checkbox"/>	<p>The SAR should be expanded to include local control center’s system operators.</p> <p>See our comments to question 3.</p> <p>The SAR should specify how each of the identified standards will be addressed through this process.</p>
<p>Response: The SAR DT believes that while “local control centers” are under the purview of either a Transmission Operator/Balancing Authority or Distribution Service Provider the SAR DT have added the functional entity of Transmission Owner as an applicable entity to give the standard DT maximum flexibility to do their work.</p>			
ERCOT		<input checked="" type="checkbox"/>	<p>There may be a need for pre-defined terms, however we do not agree with the concept of a rigorous script for communications. It would not be possible to identify every operational situation.</p>
<p>Response: The SAR’s detailed description was revised to delete the sentence that indicated the standard would require</p>			

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Question #2			
Commenter	Yes	No	Comment
<p>scripts to be used. The SAR DT's intent is for the standard to require that communications include essential elements or protocols such that information is efficiently conveyed and mutually understood.</p>			
IRC SRC		<input checked="" type="checkbox"/>	<p>We are concerned that the scope of "... the protocol shall define a rigorous script for the Sender and Receiver of information" is too prescriptive yet not exhaustive enough to cover all situations. We support the notion of defining standard terms to be used in operation personnel communication, but do not believe predetermined script is required in every communication situation, nor do we think it is possible to have a set of scripts that covers all possible cases.</p>
<p>Response: The SAR's detailed description was revised to delete the sentence that indicated the standard would require scripts to be used. The SAR DT's intent is for the standard to require that communications include essential elements or protocols such that information is efficiently conveyed and mutually understood.</p>			
ITC Transco		<input checked="" type="checkbox"/>	<p>The SAR scope needs to be clear in that it refers to specific protocols for communication, and not to "scripted" responses for every situation. Although the SAR discusses the use of protocols, other context of the remaining passages in the SAR lead one to believe otherwise.</p>
<p>Response: The SAR's detailed description was revised to delete the sentence that indicated the standard would require scripts to be used. The SAR DT's intent is for the standard to require that communications include essential elements or protocols such that information is efficiently conveyed and mutually understood.</p>			
KCPL		<input checked="" type="checkbox"/>	<p>The SAR description suggests establishment of "protocols shall define a rigorous script" to be followed. It would be impracticable to presume to think through every operating condition that scripting would require. Although the notion of everyone using the same terms or phrases sounds good, the development of such an operating "dictionary" is not practicable. Who will be the final word on terminology the industry must adopt that changes the way in which operating entities have described their adopted practices and procedures for decades?</p> <p>The scope of the SAR should limit itself to the principles of effective communication for operating entities to follow and not so prescriptive such as pre-definition of terms. Operating entities are smart enough to be able to use effective communication principles in a standard to determine and document communication protocols and terminology between them that provides effective communication. The same should apply between Reliability Coordinators. Follow the basic standards development: a standard should not say how something should be done, it should say what the required outcome should be.</p>
<p>Response: The SAR's detailed description was revised to delete the sentence that indicated the standard would require scripts to be used. The SAR DT's intent is for the standard to require that communications include essential elements or protocols such that information is efficiently conveyed and mutually understood.</p>			

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Question #2			
Commenter	Yes	No	Comment
Manitoba Hydro		<input checked="" type="checkbox"/>	<p>The scope of this SAR is much to far reaching. It appears that the intention is for the this Standard to reach into the intra region operation. This could become a safety issue as Utility Safety Rule Books could be in conflict with terminalogy being proposed by the standard writer. Getting this standard accepted by the industry at large will be a major hurtle to jump.</p>
<p>Response: The SAR's detailed description was revised to delete the sentence that indicated the standard would require scripts to be used. The SAR DT's intent is for the standard to require that communications include essential elements or protocols such that information is efficiently conveyed and mutually understood.</p> <p>The coordination between RC and TOP/BA is addressed in a separate NERC Project 2006-6 entitled Reliability Coordination and is not part of this SAR.</p> <p>It is not the intent of the standard to define terms that may conflict with other programs but rather to prescribe essential elements (not necessarily specific terms) in communications protocols such that information is efficiently conveyed and mutually understood.</p>			
Midwest SCG		<input checked="" type="checkbox"/>	<p>The recommendation from the blackout report is overly broad and vague. Tightening does not sound like a complete overhaul but rather tweaking the existing protocols and documenting them if they are informal. This may not even require a standard across all functional entities. For instance, establishing a common lexicon makes sense at face value; however, it may not be needed for communications between neighboring BAs. BAs and TOPs in a given region have long history of communication and differing terms are already understood. However, for communications that occur between regional areas, there may be a need for common terms.</p> <p>We do not agree with the concept of a rigorous script for communications. This sounds like it would require the team to identify any operational situation that could ever occur and then establish a script. If this were possible, it would be great. However, it is not possible. This is why we have trained (yes there is a training standard) operators to make decisions when new operational situations occur.</p> <p>The SAR also proposes that any reliability impacts beyond a Reliability Coordinator's area must be coordinated and approved by the impacted Reliability Coordinator. This is certainly a laudable goal but is not reasonable in all cases. If there is an IROL violation in RC A's area and the action the RC would take would impact the area of RC B, RC A could not take action until RC B approved the action. Let's assume the impact on RC B is</p>

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Question #2			
Commenter	Yes	No	Comment
			that a small load would be radialized when RC A opens a circuit to correct the IROL. This seems like a small risk to subject to RC B since the action will immediately correct the IROL. After the IROL is corrected, then RC A and RC B could begin determining other options. With the proposed language in the SAR, RC A would have violated this standard even though they eliminated that risk of more widespread outages.
<p>Response: The SAR's detailed description was revised to delete the sentence that indicated the standard would require scripts to be used. The SAR DT's intent is for the standard to require that communications include essential elements or protocols such that information is efficiently conveyed and mutually understood.</p> <p>The coordination between RC and TOP/BA is addressed in a separate NERC Project 2006-6 entitled Reliability Coordination and is not part of this SAR.</p>			
MRO Members		<input checked="" type="checkbox"/>	<p>The scope need not be so expansive , it should start at a high level with no scripted message.</p> <p>We do not agree with the concept of a rigorous script for communications. This sounds like it would require the team to identify any operational situation that could ever occur and then establish a script. If this were possible, it would be great. However, it is not possible. This is why we have trained (yes there is a training standard) operators to make decisions when new operational situations occur.</p> <p>The Communication Training can be made part of Operator Training Procedures.</p>
<p>Response: The SAR's detailed description was revised to delete the sentence that indicated the standard would require scripts to be used. The SAR DT's intent is for the standard to require that communications include essential elements or protocols such that information is efficiently conveyed and mutually understood.</p> <p>The SAR DT agrees that training is essential.</p>			
NYISO		<input checked="" type="checkbox"/>	<p>The NYISO is concerned that the scope of "... the protocol shall define a rigorous script for the Sender and Receiver of information" is too prescriptive yet not exhaustive enough to cover all situations. We support the notion of defining standard terms to be used in operation personnel communication, but do not believe predetermined script is required in every communication situation, nor do we think it is possible to have a set of scripts that covers all possible cases.</p>
<p>Response: The SAR's detailed description was revised to delete the sentence that indicated the standard would require scripts to be used. The SAR DT's intent is for the standard to require that communications include essential elements or protocols such that information is efficiently conveyed and mutually understood.</p>			

Consideration of Comments — SAR for Operating Personnel Communications Protocols

Question #2			
Commenter	Yes	No	Comment
We Energies		<input checked="" type="checkbox"/>	The scope should be limited to communications between entities and should not prescribe communication protocols for communication within an organization. Intra-company communications are most appropriately addressed by internal policies and procedures tailored to an entity's specific needs and characteristics.
Response: The SAR DT agrees — that the scope of this standard does not apply to internal non-reliability related company communications; however it does apply to separate functional entities within a single company.			

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3. The proposed standard will be applicable to Transmission Operators, Balancing Authorities, Reliability Coordinators, Generator Operators and Distribution Providers. Do you agree with the proposed applicability? If “No,” please explain why

Summary Consideration: The majority of the commenters agreed that the proposed requirements should be applicable to the RC, BA, TOP, GO and DP functional entities.

Question #3			
Commenter	Yes	No	Comment
Ameren Services	<input checked="" type="checkbox"/>		
BPA	<input checked="" type="checkbox"/>		
Constellation	<input checked="" type="checkbox"/>		
Entergy Services	<input checked="" type="checkbox"/>		
ERCOT	<input checked="" type="checkbox"/>		
FirstEnergy	<input checked="" type="checkbox"/>		
Hydro-Québec TransÉnergie	<input checked="" type="checkbox"/>		
IESO	<input checked="" type="checkbox"/>		
IRC SRC	<input checked="" type="checkbox"/>		
ISO-NE	<input checked="" type="checkbox"/>		
ITC Transco	<input checked="" type="checkbox"/>		
KCPL	<input checked="" type="checkbox"/>		
Manitoba Hydro	<input checked="" type="checkbox"/>		
NPCC CP9	<input checked="" type="checkbox"/>		
NYISO	<input checked="" type="checkbox"/>		
PSC of South Carolina	<input checked="" type="checkbox"/>		
<p>Response: The SAR DT acknowledges the commenters’ affirmative response to this question and appreciates their submission.</p>			

Consideration of Comments — SAR for Operating Personnel Communications Protocols

Question #3			
Commenter	Yes	No	Comment
Southern Company Transmission	<input checked="" type="checkbox"/>		However, there is only one "real time" requirement that is applicable to the DP. It is contained in TOP-001-1, R4. Response: The SAR DT agrees that the DP comply with direction from TOP. This standard does not conflict with that requirement but is intended to ensure quick, clear and mutual understanding of any directives from the TOP to the DP.
WECC RCCWG	<input checked="" type="checkbox"/>		The WECC RCCWG generally agrees, but some questions remain. The standard will apply to TO, BA, GO, DP; however, the SAR (Applicability Section #2) states that all those entities "will be required to adopt and employ directives that use pre-defined terms, and will require entities that receive those directives to respond to the reliability coordinator using pre-defined terms." Entities that receive those directives should respond to the entity issuing the directives using pre-defined terms. Additionally, the WECC RCCWG believes that the SAR drafting committee should consider adopting the term "directive" for reliability coordinator issue only and adopt another term, such as "operating instructions" for those actions directed by other than the reliability coordinator to distinguish between the two terms. Response: The SAR's detailed description was revised to delete the sentence that indicated the standard would require scripts to be used. The SAR DT's intent is for the standard to require that communications include essential elements or protocols such that information is efficiently conveyed and mutually understood. The SAR DT believes that limiting the use of the word directive by RC's only is not within the scope of this standard. The use of the word "directive" occurs throughout several NERC standards.
ATC LLC		<input checked="" type="checkbox"/>	Issue 1: The recommendation from the blackout report is overly broad and vague. Tightening does not sound like a complete overhaul but rather tweaking the existing protocols and documenting them if they are informal. This may not even require a standard across all functional entities. TOPs and BAs in a given region have long history of communication and differing terms are already understood. However, for communications that occur between regional areas, there may be a need for common terms. ATC does not agree with the concept of a rigorous script for communications. This may sound like it would require the team to identify any operational situation that could ever occur and then establish a script. If this were possible, it would be great. However, it is not possible. This is why we have trained operators to make decisions when new operational situations occur.

Consideration of Comments — SAR for Operating Personnel Communications Protocols

Question #3			
Commenter	Yes	No	Comment
			<p>Issue 2: The SAR needs to include local control center’s system operators. The inclusion of this group of system operators will not be simple because local control centers are not an identified entity in NERC’s functional model. Never the less if the SDT is going to create a common lexicon and procedures it’s important that these system operators are required to follow the standard. ATC believes that the purpose behind this SAR would be better address through NERC’s CEH program then through reliability standards.</p> <p>SAR Scope:</p> <p>“The scope of the proposed standard or reviewed standards is to establish a common lexicon of communications protocols and communications paths such that all operators and users of the North American bulk electric system have the same understanding as to its meaning, usage and take pre-determined action in response.”</p> <p>PER FERC Final Rule RM06- “1343. Clearly, in a region where an RTO or ISO performs the transmission operator function, its personnel with primary responsibility for real-time operations must receive formal training pursuant to PER-002-0. IN addition, personnel who are responsible for implementing instructions at a local control center also affect the reliability of the Bulk Power System. These entities may take independent action under certain circumstances, for example, to protect assets, personnel safety and during system restorations. Whether the RTO or the local control center is ultimately responsible for compliance is a separate issue addressed above, but regardless of which entity registers for that responsibility, these local control center employees must receive formal training consistent with their roles, responsibilities and tasks. Thus, while we direct the ERO to develop modifications to PER-002-0 to include formal training for local control center personnel, that training should be tailored to the needs of the positions.”</p> <p>“1345. Another organization structure, typically representative of relative smaller entities, consists of a single control center that implements operating instructions from its transmission operator, e.g., an RTO, ISO or pooled resources. Similar to the discussion above, operators at these control centers also may take independent action to protect assets, safety and system restoration. Such control center personnel must also receive formal training pursuant to PER-002-0.”</p>

Consideration of Comments — SAR for Operating Personnel Communications Protocols

Question #3			
Commenter	Yes	No	Comment
			Because NERC has been order to create training plans for local control center’s system operator any common lexicon and communications protocols could be dealt with for all entities most effectively in NERC’s CEH program.
Response: See previous responses to Questions 1 and 2.			
Midwest SCG		<input checked="" type="checkbox"/>	We agree that these functional entities should be considered for applicability; however, it is possible that the final standard should not apply to all of them. Further examination of the reason for the recommendation of the from the blackout report would help determine this.
Response: The SAR DT view is all of the applicable entities, RC, BA, TOP, GO, DP should be guided by communication protocols to ensure quick, clear and mutual understanding of information between them in real time. The specific reasons identified in the Blackout report are addressed by this SAR but is not limited by them.			
MRO Members		<input checked="" type="checkbox"/>	We agree that these functional entities should be considered for applicability; and in addition it should apply to Interchange Coordinator Function.
Response: The SAR DT believes the Interchange Authority function is under the BA function. The IA does ‘receive’ info from other entities and may, under some circumstances relay that info to others – see FM V3 P32, Real-time #7.			
We Energies		<input checked="" type="checkbox"/>	Scope should be limited to communication among separate entities/organizations. For example, the standard should not address communication protocols between a Balancing Authority, Generaotr Operator and a Distribution Provider tha are the same corporate entity. The requirement to maintain situational awareness within a given entiy is addressed by other standards.
Response: The SAR DT agrees that the scope of this standard does not apply to internal non-reliability related company communications protocols, however it does apply to separate functional entities within a single company.			

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

Summary Consideration: Based on stakeholder comments, the SAR DT modified the SAR to clarify that EOP-001-0 Attachment 1 should be addressed by the standard drafting team.

Question #4				
Commenter	Yes	No	Requirement	Comment
Southern Company Transmission	<input checked="" type="checkbox"/>		IRO-016-1, R1	We do not recommend bringing the requirement over to this SAR. It is better to leave in the IRO standards.
Response: The SAR DT would like the Standard DT to consider communication-related requirements in other standards for duplication, conflicts and consolidation.				
BPA				None identified.
Hydro-Québec TransÉnergie				No others.
ISO-NE				No others.
Manitoba Hydro				If it is the intention of the standard writer to re write these requirements into scripts than we see problems, especially if it is intended to push these scripts into the entities' intra region operating procedures.
Response: The SAR DT does not intend to re-write any requirements into scripts.				
MRO Members	<input checked="" type="checkbox"/>			EOP-001-0 Attachment 1
Response: The SAR DT agrees with the commenter.				
NPCC CP9				No others.

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

Summary Consideration: Based on stakeholder comments, the SAR DT modified the SAR to clarify that three-part communications will be included in the proposed requirements.

Question #5			
Commenter	Yes	No	Comment
PSC of South Carolina			The PSCSC believes the SAR should specifically acknowledge the power and effectiveness of three-part communications in ensuring common understanding of verbal exchanges. Three-part communications include the sender giving the information, the receiver repeating the information back, and the sender acknowledging the correctness of the repeated information. This form of communication is used in nuclear plant communications and in other industries where it is critical that everyone involved has a common understanding of the intended message.
Response: The SAR DT thanks the commenter for this item and has incorporated the use of three-part communications into the scope of the SAR.			
Southern Company Transmission			<p>*Under FERC staff's Preliminary Assessment contained on page 7 of the SAR (items i and ii), item ii should not be addressed in this SAR. There are numerous requirements in the IRO standards already that adequately cover communications to other RCs for situations in which a reliability impact may go beyond a RC's area of view. In particular, the following standard requirements address the 2nd part (ii): IRO-001-1, Req. 7; IRO-003-2, Req.1; IRO-004-1, Req.2; IRO-014-1, Req.1,2,3; IRO-015-1, Req.1,2; IRO-016-1, Req.1;</p> <p>*If the SAR drafting team removes the requirements of the standards referenced in the "Related Standards" section of this SAR and move them to this SAR, it will become difficult for a Reliability Coordinator to know where to go for standards applicable to them. For example, currently most of the requirements related to real time actions taken by a RC are contained in the IRO standards. If the 4 IRO standard requirements are removed from the IRO standards and placed into this SAR, the RC system operators will now have to refer to more standards to find requirements related to their responsibilities. This same scenario also applies to the other standard drafting teams who are considering the same actions.</p> <p>It would be helpful if NERC were to provide on the Standards Homepage a listing of</p>

Consideration of Comments — SAR for Operating Personnel Communications Protocols

Question #5			
Commenter	Yes	No	Comment
			standards by Function: RC, BA, TOP, etc. Then the RC could review the RC function and know all standards that are applicable to them in a quick and easy fashion.
<p>Response: The SAR DT would like the Standard DT to consider communication-related requirements in other standards for duplication, conflicts and consolidation.</p> <p>There is a link to a document "Version 0 and Version 1 Matrix of Requirements by Function" on the NERC Standards website. The link may be found on the "BOT Approved Standards" webpage in the center of the page. Many standards include requirements that are applicable to more than one functional entity.</p>			
FirstEnergy			No additional comments.
Manitoba Hydro			<p>We believe that there is a need to clean up the communication protocol in as far as full name identification of all parties for all communications between entities and three part communication: the sender giving the information or direction, the receiver repeating the information or direction back as to his understanding, and the receiver confirming or correcting the repeated statement. If there is a correction than the process is repeated.</p> <p>A glossary of terms for industry standard operating terms is essential. This glossary with input from the entities should be an integral part of this SAR.</p>
<p>Response: The SAR DT thanks the commenter for the item regarding three part communications and have incorporated it into the scope of the SAR.</p> <p>The SAR's detailed description was revised to delete the sentence that indicated the standard would require scripts to be used. The SAR DT's intent is for the standard to require that communications include essential elements or protocols such that information is efficiently conveyed and mutually understood.</p>			
MRO Members			<p>Proof of the pudding is in tightly defining the Requirements and stipulating the Severity Levels and VRFs accurately so that the penalties are commensurate with the severity level and the VRF.</p> <p>Is there a consistent methodology between IRO-014-1 R1.1 footnote 1 and CIP-008-1 R1.2?</p> <p>Is IRO-001-1 R3 a repeat of IRO-005-2 R3?</p> <p>There is an overlapping request for requirements for communication facilities for use during emergencies. These requests are made in this SAR (Operating Personnel Communications Protocols Project 2007-02) and in the SAR for Project 2006-06 Reliability Coordination-Attachment 1. Perhaps both the associated drafting teams could</p>

Consideration of Comments — SAR for Operating Personnel Communications Protocols

Question #5			
Commenter	Yes	No	Comment
			work together so that there are no overlapping requirements among developed standards. We do not see the purpose behind not including the recommendation regarding the upgrade to communication system hardware in this SAR. This SAR should include , if need be, the recommendations to upgrade communication system hardware.
<p>Response: The Standard DT and Compliance Elements DT will work together to ensure the VRF and VSL assignments are appropriate.</p> <p>The SAR DT will endeavor to eliminate any duplication and/or contradictions with other reliability standards.</p> <p>COM-001 addresses hardware requirements and continue to be in effect until it is formally retired. The retirement can occur all at once or can occur on a requirement by requirement basis.</p>			
NPCC CP9			NPCC participating members agree with the concepts in the SAR.
SRP			The SAR is a proposal for protocols to be used over "pre-established communications paths". This is good as far as it goes. When Operations sits down to write up these protocols with their peers, I recommend that they have a Communications person from at least one of the utilities on the panel to initially clearly delineate what the recommended path(s) are between the subject utilities. This will be based on use of private systems first with the possibility of widespread unavailability of commercial services, etc.
<p>Response: Thank you for your comment, the scope of this SAR concerns itself with communication protocols (verbal, written and visual) and not with telecommunications systems. (See COM-001-1)</p>			