

Comment Report

Project Name: 2015-07 Internal Communications Capabilities
Comment Period Start Date: 3/23/2016
Comment Period End Date: 5/9/2016
Associated Ballots: 2015-07 Internal Communications Capabilities COM-001-3 AB 2 ST
2015-07 Internal Communications Capabilities COM-001-3 Non-binding Poll AB 2 NB

There were 42 sets of responses, including comments from approximately 37 different people from approximately 34 companies representing 9 of the Industry Segments as shown in the table on the following pages.

Questions

1. Do you agree that the proposed Requirements R12 and R13 in the proposed COM-001-3 address the directive in Order No. 808? If not, please explain why you do not agree and, if possible, provide specific language revisions that would make it acceptable to you.
2. If you have any other comments on the proposed COM-001-3 that you haven't already mentioned above, please provide them here:

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
ACES Power Marketing	Ben Engelby	6		ACES Standards Collaborators - COM-001 Project	Ellen Watkins	ACES Power Marketing	1	SPP RE
					Bob Solomon	ACES Power Marketing	1	RF
					Bill Hutchison	ACES Power Marketing	1	SERC
					John Shaver	ACES Power Marketing	1,4,5	WECC
					Shari Heino	ACES Power Marketing	1,5	Texas RE
					Doug White	ACES Power Marketing	3,4,5	SERC
					Mike Brytowski	ACES Power Marketing	1,3,5,6	MRO
					Ginger Mercier	ACES Power Marketing	1,3	SERC
					Kevin Lyons	ACES Power Marketing	1	MRO
					Amber Skillern	ACES Power Marketing	1,3	SERC
					Greg Froehling	ACES Power Marketing	3	SPP RE
Chris Gowder	Chris Gowder		FRCC	FMPA	Tim Beyrle	Chris Gowder	4	FRCC
					Jim Howard	Chris Gowder	5	FRCC
					Lynne Mila	Chris Gowder	4	FRCC
					Javier Cisneros	Chris Gowder	3	FRCC
					Randy Hahn	Chris Gowder	3	FRCC
					Don Cuevas	Chris Gowder	1	FRCC
					Stan Rzad	Chris Gowder	4	FRCC
					Matt Culverhouse	Chris Gowder	3	FRCC
					Tom Reedy	Chris Gowder	6	FRCC
					Steve Lancaster	Chris Gowder	3	FRCC
					Mike Blough	Chris Gowder	5	FRCC
					Mark Brown	Chris Gowder	4	FRCC
					Chris Adkins	Chris Gowder	3	FRCC
Ginny Beigel	Chris Gowder	9	FRCC					

Duke Energy	Colby Bellville	1,3,5,6	FRCC,RF,SERC	Duke Energy	Doug Hils	Duke Energy	1	RF
					Lee Schuster	Duke Energy	3	FRCC
					Dale Goodwine	Duke Energy	5	SERC
					Greg Cecil	Duke Energy	6	RF
Dominion - Dominion Resources, Inc.	Randi Heise	5		Dominion - RCS	Larry Nash	Dominion - Dominion Resources, Inc.	1	SERC
					Louis Slade	Dominion - Dominion Resources, Inc.	6	SERC
					Connie Lowe	Dominion - Dominion Resources, Inc.	3	RF
					Randi Heise	Dominion - Dominion Resources, Inc.	5	NPCC
Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7	NPCC	RSC No IESO Con-Ed and National Grid	Paul Malozewski	Northeast Power Coordinating Council	1	NPCC
					Guy Zito	Northeast Power Coordinating Council	NA - Not Applicable	NPCC
					Rob Vance	Northeast Power Coordinating Council	1	NPCC
					Mark J. Kenny	Northeast Power Coordinating Council	1	NPCC
					Gregory A. Campoli	Northeast Power Coordinating Council	2	NPCC
					Randy MacDonald	Northeast Power Coordinating Council	2	NPCC
					Wayne Sipperly	Northeast Power Coordinating Council	4	NPCC

Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7	NPCC	RSC No IESO Con-Ed and National Grid	David Ramkalawan	Northeast Power Coordinating Council	4	NPCC
					Glen Smith	Northeast Power Coordinating Council	4	NPCC
					Brian Robinson	Northeast Power Coordinating Council	5	NPCC
					Bruce Metruck	Northeast Power Coordinating Council	6	NPCC
					Alan Adamson	Northeast Power Coordinating Council	7	NPCC
					Edward Bedder	Northeast Power Coordinating Council	1	NPCC
					David Burke	Northeast Power Coordinating Council	3	NPCC
					Michele Tondalo	Northeast Power Coordinating Council	1	NPCC
					Kathleen Goodman	Northeast Power Coordinating Council	2	NPCC
					Sylvain Clermont	Northeast Power Coordinating Council	1	NPCC
					Si Truc Phan	Northeast Power Coordinating Council	2	NPCC
					Sean Bodkin	Northeast Power Coordinating Council	4	NPCC

Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7	NPCC	RSC No IESO Con-Ed and National Grid	Silvia Parada Mitchell	Northeast Power Coordinating Council	4	NPCC
Southwest Power Pool, Inc. (RTO)	Shannon Mickens	2	SPP RE	SPP Standards Review Group	Shannon Mickens	Southwest Power Pool, Inc. (RTO)	2	SPP RE
					Jason Smith	Southwest Power Pool, Inc. (RTO)	2	SPP RE
					James Nail	Southwest Power Pool, Inc. (RTO)	3,5	SPP RE
					Ron Losh	Southwest Power Pool, Inc. (RTO)	2	SPP RE
					Sean Simpson	Southwest Power Pool, Inc. (RTO)	NA - Not Applicable	NA - Not Applicable
					kevin Giles	Southwest Power Pool, Inc. (RTO)	1,3,5,6	SPP RE
					Carl Stelly	Southwest Power Pool, Inc. (RTO)	2	SPP RE
					John Allen	Southwest Power Pool, Inc. (RTO)	1,4	SPP RE
					J. Scott Williams	Southwest Power Pool, Inc. (RTO)	1,4	SPP RE
Colorado Springs Utilities	Shawna Speer	1		Colorado Springs Utilities	Shawna Speer	Colorado Springs Utilities	1	WECC
					Shannon Fair	Colorado Springs Utilities	6	WECC
					Charles Morgan	Colorado Springs Utilities	3	WECC
					Kaleb Brimhall	Colorado Springs Utilities	5	WECC
Oxy - Occidental Chemical	Venona Greaff	7		Oxy	Venona Greaff	Oxy - Occidental Chemical	7	SERC
					Michelle D'Antuono	Oxy - Occidental Chemical	5	Texas RE

1. Do you agree that the proposed Requirements R12 and R13 in the proposed COM-001-3 address the directive in Order No. 808? If not, please explain why you do not agree and, if possible, provide specific language revisions that would make it acceptable to you.

Bob Thomas - Illinois Municipal Electric Agency - 4

Answer No

Document Name

Comment

The proposed R12 & R13 address the directive in Order No. 808, but are not necessary. Illinois Municipal Electric Agency (IMEA) does not believe proposed R12 and R13 are consistent with NERC's risk-/results-based Reliability Standards or the Paragraph 81 initiative. R12 and R13 would increase demands on Compliance resources (e.g., procedure development/revision, internal controls identification/development, compliance monitoring/demonstration, RSAW development, etc.) with no improvement to the reliability of (no reduced risk to) the BES/BPS. During the most recent COM-001-3 WebEx Q&A session, it was indicated there is no awareness of a system event being caused or exacerbated by a DP or GOP lacking internal Interpersonal Communication capability. The point here is not that DP and GOP internal communication capability is not important; the point is that with current technology such communication capability is already in place. R12 and R13 address a risk (are trying to fix a problem) that doesn't exist. For R12, IMEA defers to entities impacted by the proposed language. For R13, IMEA recommends deletion of this proposed requirement.

Likes 0

Dislikes 0

Response

Jay Barnett - Exxon Mobil - 7

Answer No

Document Name

Comment

FERC comments at P. 41 in Order No. 808 mention geographically separate control centers and the standard rationale acknowledges that certain communications in single Control Centers that are ongoing and occur throughout the day as part of day-to-day control center operation are not the focus of COM-001-3. This same rationale should be used as well for personnel at single facilities that are not geographically separated (i.e. personnel within a single generating unit). Information necessary for the Reliable Operation of the BES might be communicated between field operators at a single generating unit; however, this capability is inherent and necessary for the safe and reliable operation of that unit. Requiring an entity to retain, for instance, evidence of having radio communications between field operators is an unnecessary administrative burden. Requirement R12 should be modified as:

"R12. Each RC, TOP, GOP, and BA shall have internal Interpersonal Communication capabilities for the exchange of information necessary for the Reliable Operation of the BES. This includes communication capabilities between Control Centers within the same functional entity, or between a Control Center and field personnel, **and excludes communication capabilities between personnel within an individual Facility.**"

Likes 0

Dislikes 0

Response

Scott Berry - Indiana Municipal Power Agency - 4 - RF**Answer** No**Document Name****Comment**

The proposed Requirements R12 and R13 meet the Paragraph 81 initiative criteria and are purely administrative in nature. IMPA is not aware of an electrical industry entity that does not operate or conduct business with some form of Interpersonal Communication capability. Generally, entities operate with many redundant forms of communication that will prevent them from having a scenario where they have a complete loss of Interpersonal Communication capability.

Likes 0

Dislikes 0

Response**Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO****Answer** No**Document Name****Comment**

R12 and R13:

(A) Within FERC Order 808, P. 41, (1), FERC directs the adequacy of internal communications that have an adverse effect on reliability, within a single functional entity that is geographically separated. The currently proposed R12 does not address FERC's directive (1). Recommend R12 to read as: *"This includes communication capabilities between geographically separated Control Centers ..."* be incorporated into this portion of R12. Without this qualifier, CEAs may believe that this is applicable between Primary and Backup Control Centers for BA, TOP, and RC per EOP-008-1. As written in EOP-008-1, R1 and R1.2.3, the BA, TOP and RC have to have an Operating Plan describing voice communications in order to meet their functional obligations and not communications between Primary and Backup Control Centers.

(B) To ensure consistency, recommend R13 also be revised as follows: *"This includes communication capabilities between geographically separated control centers ..."*

(C) Within FERC Order 808, P. 41, (1) and (2) FERC uses the word "and" where the SDT uses the word "or". These two words have drastically different meanings within the context of a Reliability Standard. Recommend that "or" be changed to "and" in order to fulfill the FERC directive.

Likes 0

Dislikes 0

Response**Scott Hoggatt - WEC Energy Group, Inc. - 6****Answer** No**Document Name****Comment**

I support the comments provided by Matthew Beilfuss of the WEC Energy Group.

Likes 0

Dislikes 0

Response

Ben Engelby - ACES Power Marketing - 6, Group Name ACES Standards Collaborators - COM-001 Project

Answer

No

Document Name

Comment

1. The SDT has introduced significant ambiguity to Requirement R13 by categorizing Distribution Provider centers as lowercase “control centers.” This is the opposite approach from most SDTs that provide clarity by referencing a NERC defined term. Including a lowercase glossary term and expecting industry to know the meaning will only create confusion and uncertainty. The requirements for DPs should not be identical to communication requirements imposed RCs, BAs, TOPs, and GOPs because DPs do not have the same impacts and the grid and do not necessarily have control centers. Distribution entities could be second-guessed by auditors, even though their facilities are for the operation of the distribution system, which poses a minimal risk to the Bulk Electric System. Requirement R13 creates unnecessary compliance burdens that are not outweighed by reliability benefits. We strongly suggest that the SDT strike R13.
2. If the SDT chooses not to take our suggestion above to strike R13, we offer an alternative approach for consideration. We recommend the SDT add an exemption to DPs that pose a low risk to the BES. To achieve this, the SDT could revise the applicability section to apply only to DPs that have a role in a TOP’s restoration plan or DPs that are part of a UFLS scheme. This modification would focus on the subset of DPs that pose a risk to reliability of the BES.
3. For requirements R12 and R13, there could be a wide range of auditor interpretations, including treating any failure of a communication system as a violation. We suggest the SDT adopt language similar to what is in place for external communication capabilities requirements to notify affected entities and develop plan to remedy the situation. A failure of external communication capabilities is not a violation in and of itself. The SDT needs to be clear that a simple failure of an internal communication capabilities is not a violation either.
4. While we appreciate the SDT providing additional time to implement the standard, we feel the proposed implementation plan of nine months should be increased to 18 months.
5. The VSLs for R12 and R13 should be revised to be on a graduated scale that includes the amount of time communications were unavailable. The binary nature of the current VSLs result in a severe violation level for any communication failure.

Likes 0

Dislikes 0

Response

Anthony Jankowski - WEC Energy Group, Inc. - 4**Answer** No**Document Name****Comment**Matthew Beilfuss, **On Behalf of:** WEC Energy Group, Inc.

Likes 0

Dislikes 0

Response**Amy Casuscelli - Amy Casuscelli****Answer** No**Document Name****Comment**

Xcel Energy supports the comments provided by the MRO NERC Standards Review Forum.

Likes 0

Dislikes 0

Response**M Lee Thomas - Tennessee Valley Authority - 5****Answer** No**Document Name****Comment**

While the Requirements R12 and R13 in the proposed COM-001-3 address the directive in Order No. 808 sufficiently, TVA believes the standard is inadequate in that additional clarification is needed. The Rationale for R12 states

“Therefore, the applicable entities must have the capability to exchange information between Control Centers of that functional entity . . . Also, applicable entities must have the capability to exchange information between a Control Center and field personnel.”

This clearly establishes that the required internal Interpersonal Communication Capability consists of, and is sufficiently demonstrated by, communication capability between Control Centers within the same functional entity and between Control Centers and field personnel.

However, Requirement R12 as written uses the phrase

“This includes communication capabilities between Control Centers within the same functional entity, or between a Control Center and field personnel.”

Saying only that the required capabilities “includes” the two aspects listed leaves the possibility that other capabilities, such as between a single generating unit’s control room and its field personnel, should be considered, thus rendering the scope of Requirement R12 indefinite.

The required communication capabilities between the Control Center and field personnel also needs clarification. It is possible that field personnel would be operating in an area where radio and cellular coverage does not exist. When this is the case, the field personnel would normally travel or locate themselves to a point where communication is possible while receiving or reporting the completion of Operating Instructions.

Accordingly, TVA suggests the following rewording for R12 as follows:

“This *consists of* communication capabilities between Control Centers within the same functional entity, or between a Control Center and field personnel. *Interpersonal Communications Capability with field personnel is required only during issuance of Operating Instructions or receipt of condition reports following performance of Operating Instructions, but is not required while Operating Instructions are actually being performed.*”

Although the Rationale for R13 is varies slightly from that of R12, the same argument applies.

Likes	0
Dislikes	0
Response	
Andrew Pusztai - American Transmission Company, LLC - 1	
Answer	No
Document Name	
Comment	

ATC supports the comments that were submitted by the MRO NSRF(see below)

R12 and R13:

1. Within FERC Order 808, P. 41, (1), FERC directs the adequacy of internal communications that have an adverse effect on reliability, within a single functional entity that is geographically separated. The currently proposed R12 does not address FERC's directive (1). Recommend R12 to read as: *"This includes communication capabilities between geographically separated Control Centers ..."* be incorporated into this portion of R12. Without this qualifier, CEAs may believe that this is applicable between Primary and Backup Control Centers for BA, TOP, and RC per EOP-008-1. As written in EOP-008-1, R1 and R1.2.3, the BA, TOP and RC have to have an Operating Plan describing voice communications in order to meet their functional obligations and not communications between Primary and Backup Control Centers.
2. To ensure consistency, recommend R13 also be revised as follows: *"This includes communication capabilities between geographically separated control centers ..."*
3. *Within FERC Order 808, P. 41, (1) and (2) FERC uses the word "and" where the SDT uses the word "or". These two words have drastically different meanings within the context of a Reliability Standard. Recommend that "or" be changed to "and" in order to fulfill the FERC directive.*

Likes 0

Dislikes 0

Response

Diana McMahon - Salt River Project - 1,3,5,6 - WECC

Answer

No

Document Name

Comment

Thank you for the effort of drafting and addressing Order 808. As drafted the requirements do not account for the intention to address issues "whenever internal communications could directly affect the reliable operation of the Bulk-Power System". Co-located operational teams would need to provide evidence of compliance when they are within the same room. While the rationale for 12 appears to address this issue, the language of the standard does not exempt these situations. Additionally, the requirement of Interpersonal communication to field personnel and the documentation of such communication is overly burdensome. To ensure that all field personnel have Interpersonal Communications entities will be required to maintain records demonstrating that all personnel have adequate coverage areas and have communication devices at all times. An employee leaving his cell at a remote site could result in an inadvertent violation.

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7 - NPCC, Group Name RSC No IESO Con-Ed and National Grid

Answer

No

Document Name

Comment

The second sentence of R12 should encompass all Control Centers, and all personnel that affect the Real-time operation of the Bulk Electric System. Even though Order No. 808 refers specifically to the Bulk-Power System, the assumption is that FERC is referring to the Bulk Electric System. Suggest revising Requirement R12 to read:

Each Reliability Coordinator, Transmission Operator, Generator Operator, and Balancing Authority shall have internal Interpersonal Communication capabilities for the exchange of information that is necessary for the Reliable Operation of the BES. This includes communication capabilities between Control Centers within the same functional entity, and between Control Centers and all personnel whose responsibilities can impact the Real-time operation of the BES.

Similarly, suggest revising Requirement R13 to read:

Each Distribution Provider shall have internal Interpersonal Communication capabilities for the exchange of information that is necessary for the Reliable Operation of the BES. This includes communication capabilities between Control Centers within the same functional entity, and between Control Centers and all personnel whose responsibilities can impact the Real-time operation of the BES.

Likes 0

Dislikes 0

Response

Oshani Pathirane - Hydro One Networks, Inc. - 1,3 - NPCC

Answer

No

Document Name

Comment

Hydro One Networks Inc. believes that the term “*field personnel*” is subject to interpretation and is an undefined term. For example, site maintenance staff, site security personnel, or site cleaning staff who typically would not have direct contact with BES assets may be subject to the requirement and such an interpretation would be unnecessarily onerous on entities, with no significant improvement to BES reliability. We suggest adding more specificity by adding, “*field personnel authorized to directly control BES assets*”.

We also support the IESO (Ontario) in suggesting that the words “*geographically separate Control Centers*” be added to explicitly state that “*between Control Centers within the same functional entity*” implies geographically separate locations.

While Hydro One Networks Inc. agrees that the intent of the directive in FERC Order 808 is adequately addressed, the requirement verbiage could be more specific by including the term “*Operating Instruction*”.

Therefore, we suggest the following wording which incorporates all our suggestions above:

“Each Reliability Coordinator, Transmission Operator, Generator Operator, and Balancing Authority shall have internal Interpersonal Communication capabilities for the exchange of information involving Operating Instructions that are necessary for the Reliable Operation of the BES. This includes communication capabilities between geographically separate Control Centers within the same functional entity, or between a Control Center and field personnel authorized to directly control BES assets”.

Likes 0

Dislikes 0

Response

Shawna Speer - Colorado Springs Utilities - 1, Group Name Colorado Springs Utilities

Answer No

Document Name

Comment

Colorado Springs Utilities does not see a reliability gap requiring the addition of Requirements R12. and R13. Communication with field personnel is a requirement of conducting business.

Likes 0

Dislikes 0

Response

Leonard Kula - Independent Electricity System Operator - 2

Answer Yes

Document Name

Comment

We agree that the proposed Requirements R12 and R13 address the directive in Order 808, although their clarity can be further improved to leave no doubts on the requirement to have the required communication capability between geographically separate control centers within the same functional entity. We suggest the SDT to insert the words “geographically separate” into R12 and R13 as we previously suggested.

Likes 0

Dislikes 0

Response

Matthew Beilfuss - WEC Energy Group, Inc. - 3,4,5,6 - RF

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Chris Gowder - Chris Gowder, Group Name FMPA

Answer	Yes
Document Name	
Comment	
See response to question 2.	
Likes 0	
Dislikes 0	
Response	
Jared Shakespeare - Peak Reliability - 1	
Answer	Yes
Document Name	
Comment	
Peak Reliability supports this Standard.	
Likes 0	
Dislikes 0	
Response	
Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group	
Answer	Yes
Document Name	
Comment	
<p>We commend the drafting team on their efforts in reference to the proposed changes pertaining to Requirement R12 and Requirement R13. Especially in Requirement R13, the way they captured the Distribution Provider (DP) facilities supporting the reliability of the Bulk Electric System (BES) by using the lower-case form of 'control center'. However, we have a concern that the team didn't capitalize the term 'reliable operation' (third sentence of page 18 of the Supplemental Material-Rationale Section). In the following sentence in that paragraph, the term is capitalized there as well as in Requirement R13. We would ask the drafting team to provide some clarity on why the term was not capitalized in the Rationale Section.</p>	
Likes 0	
Dislikes 0	
Response	
Venona Greaff - Oxy - Occidental Chemical - 7, Group Name Oxy	
Answer	Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Michelle D'Antuono - Oxy - Ingleside Cogeneration LP - 5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Robert Coughlin - ISO New England, Inc. - 2 - NPCC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Robert Coughlin - ISO New England, Inc. - 2 - NPCC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Robert Coughlin - ISO New England, Inc. - 2 - NPCC**Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

Response**Randi Heise - Dominion - Dominion Resources, Inc. - 5, Group Name Dominion - RCS****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

Response**Michael Puscas - ISO New England, Inc. - 2****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

Response**Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Laura Nelson - IDACORP - Idaho Power Company - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Elizabeth Axson - Electric Reliability Council of Texas, Inc. - 2

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Tom Haire - Rutherford EMC - 3

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

John Fontenot - Bryan Texas Utilities - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

John Fontenot - Bryan Texas Utilities - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response**Julie Hall - Entergy - 6****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Karie Barczak - DTE Energy - Detroit Edison Company - 3****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Karie Barczak - DTE Energy - Detroit Edison Company - 3****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Karie Barczak - DTE Energy - Detroit Edison Company - 3**

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Yvonne McMackin - Public Utility District No. 2 of Grant County, Washington - 1,4,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Gerry Adamski - Essential Power, LLC - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Erika Doot - U.S. Bureau of Reclamation - 5	
Answer	
Document Name	
Comment	

The Bureau of Reclamation appreciates the drafting team's efforts to address the reliability gap discussed in FERC Order No. 808 P 41 (Apr. 16, 2015) that was created when internal communications addressed in Requirement R1.1 of COM-001-1 were not included in COM-001-2. Reclamation believes that the proposed requirements are appropriate for the Reliability Coordinator, Transmission Operator, and Balancing Authority functions.

Reclamation reiterates that the proposed changes in COM-001-3 go beyond the scope of FERC Order No. 808 by adding requirements for internal communications for Generator Operators and Distribution Providers. Reclamation notes that P 41 of Order No. 808 addressed Requirement R1.1, which only applied to Reliability Coordinators, Transmission Operators and Balancing Authorities. Therefore, Reclamation suggests that the Generator Operator and Distribution Provider functions should be removed from requirements R12 and R13.

Reclamation believes that requiring internal communication capabilities between geographically separate Generator Operator control centers that direct the operations of different facilities, under the supervisor of separate Transmission Operators or Balancing Authorities, will not improve BES reliability. Instead, it may have an adverse impact on BES reliability (especially during system disturbances) by introducing communications capability between additional, unnecessary parties who do not have familiarity with local configurations, operations or area-wide system impacts. For example, requiring internal communication capabilities between generation control centers in the Pacific Northwest, Desert Southwest, and/or Rocky Mountain states that coordinate with different Transmission Operators and do not direct operations of any overlapping facilities will not improve BES reliability. However, as proposed, the standard would impose unnecessary additional communication and compliance costs for these Generator Operators. Reclamation does not believe that the R12 caveat regarding "information necessary for the Reliable Operation of the BES" adequately addresses this concern, and opens the door for a wide range of audit interpretations on the issue.

Likes	0
Dislikes	0
Response	

2. If you have any other comments on the proposed COM-001-3 that you haven't already mentioned above, please provide them here:

Gerry Adamski - Essential Power, LLC - 5

Answer

Document Name

Comment

We vote in the affirmative with the understanding that we can demonstrate we have the internal communication systems established between our control room personnel and personnel within the plant as a means to satisfy R12. If this is not the drafting team's intent, then further clarifications are necessary to the language in the standard. Furthermore, we do not believe these requirements are necessary at all but understand that NERC is required to respond to the FERC directive.

Likes 0

Dislikes 0

Response

Shawna Speer - Colorado Springs Utilities - 1, Group Name Colorado Springs Utilities

Answer

Document Name

Comment

Internal Interpersonal Communications used solely to communicate within a Facility (i.e. radio communication between operators) are inherent and necessary for the safe and reliable operation of that Facility and should be excluded from COM-001-3 due to the lack of reliability benefit.

Likes 0

Dislikes 0

Response

Karie Barczak - DTE Energy - Detroit Edison Company - 3

Answer

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response

John Fontenot - Bryan Texas Utilities - 1

Answer

Document Name

Comment

na

Likes 0

Dislikes 0

Response

John Fontenot - Bryan Texas Utilities - 1

Answer

Document Name

Comment

na

Likes 0

Dislikes 0

Response

Tom Haire - Rutherford EMC - 3

Answer

Document Name

Comment

This standard should be clearly restricted to only BES elements.

Likes 0

Dislikes 0

Response

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group

Answer

Document Name

Comment

We suggest to the drafting team/review panel to include all the Rationale information from the Standard into the RSAW. We feel including this information will help improve the communication efforts in the auditing process amongst the auditor and the industry.

Likes 0

Dislikes 0

Response**Jared Shakespeare - Peak Reliability - 1**

Answer

Document Name

Comment

Peak Reliability supports this Standard.

Likes 0

Dislikes 0

Response**Chris Gowder - Chris Gowder, Group Name FMIPA**

Answer

Document Name

Comment

The proposed requirements undoubtedly address FERC’s directive in Order No. 808, but they also go beyond “ensuring the adequacy of internal communications capability”. As currently drafted, the added requirements are very broad and difficult to measure. There were several concerns from industry stakeholders in the last comment period that the drafting team has not answered.

The drafting team states several times in its response to comments that FERC did not limit its directive to specific functional entities or state any limitation for internal Interpersonal Communications, but has not provided any justification for including entities that do not operate control centers (capitalized or otherwise). Simply addressing a FERC directive should not be the drafting team’s goal. It should be to write a quality, results-based standard with input from industry.

The examples contained in the requirements do not affect the scope of who, under what conditions, shall perform what action, to achieve the desired outcome of the requirement. Who determines what information is “necessary for the Reliable Operation of the BES”? Does the plant operator sitting in front of an HMI need communication capability with the instrument and control technician walking around the plant site? Stated differently, does the GOP need to prove such a capability exists to be found compliant? Does a DP that does not have any BES equipment need to do anything, or can they show through studies that they cannot cause “instability, uncontrolled, separation or cascading failures” (from definition of Reliable Operation)?

Industry agreed with the inclusion of DPs and GOPs as applicable entities for the other requirements in COM-001, but there are many who do not agree with them being included in these requirements. All applicable entities of a standard do not necessarily need to be a part of every requirement of that standard, so the drafting team’s reasoning for including the DP and GOP is not convincing.

We appreciate the time and efforts of the drafting team but it is our position that the standard as currently written leaves too many questions unanswered and is too ambiguous to be effective and achieve the goal of increased reliability. We look forward to the drafting team’s response to our concerns.

Likes 0

Dislikes 0

Response

Elizabeth Axson - Electric Reliability Council of Texas, Inc. - 2

Answer

Document Name

Comment

ERCOT recommends that the SDT modify the second sentence in Requirements R12 and R13 to read as follows: “This includes communication capabilities between Control Centers within the same functional entity, or between a functional entity’s Control Center and its field personnel.” Adding these words ensures clarity that the field personnel identified are those associated with the same functional entity that operates the Control Center.

Likes 0

Dislikes 0

Response

M Lee Thomas - Tennessee Valley Authority - 5

Answer

Document Name

Comment

While Measures M8, M11, and M12 all imply that the Generator Operator has some discretion regarding what evidence to retain, the language of C.1.2 Evidence Retention could be construed to mean that voice recordings are mandatory evidence:

“ . . . shall retain written documentation for the most recent twelve calendar months and voice recordings for the most recent 90 calendar days.”

While written documentation as described in the respective Measures is a normal expectation for almost every Reliability Standard, the implication that GOP “shall retain” voice recordings could require installation of new equipment, systems, and programs that represent an otherwise unnecessary and significant expenditure. Accordingly, TVA suggests the following rewording of C.1.2 Evidence Retention:

“ . . . shall retain written documentation for the most recent twelve calendar months and, *where the capability exists*, voice recordings for the most recent 90 calendar days.”

Likes 0

Dislikes 0

Response

Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy

Answer

Document Name

Comment

Duke Energy requests more clarification from the drafting team regarding the level of detail required for demonstration of compliance with R12 and R13. For example, is it the drafting team’s intent that producing detailed telecommunications diagrams displaying the interpersonal communications capabilities, or would it be satisfactory to demonstrate the actual phone used to perform said communications? Is it the intent of the drafting team to only require an entity to produce or identify the actual medium used to communicate?

Likes 0

Dislikes 0

Response

Ben Engelby - ACES Power Marketing - 6, Group Name ACES Standards Collaborators - COM-001 Project

Answer

Document Name

Comment

Thank you for the opportunity to comment.

Likes 0

Dislikes 0

Response

Scott Berry - Indiana Municipal Power Agency - 4 - RF**Answer****Document Name****Comment**

Requirement R11 (and similar requirements) needs clarification. If an entity does have a failure of its Interpersonal Communication capability (loss of all communications), how is it supposed to consult each entity affected by the failure? Therefore, an entity has to use some back up form of communication, so does it really have a failure of Interpersonal Communication capability if it is consulting with entities that are affected by the loss of communication(s)?

Likes 0

Dislikes 0

Response**Matthew Beilfuss - WEC Energy Group, Inc. - 3,4,5,6 - RF****Answer****Document Name****Comment**

It is difficult to contemplate a scenario where a functional entity would be meeting existing reliability standards and not have an internal Interpersonal Communication capability between control centers or to field personnel necessary for the Reliable Operation of the BES. The measures for Reliable Operation of the BES are the existing standards, not the existence of an internal communications capability.

The Violation Severity Levels (VSLs) associated with R12 / R13 identify a scenario of non-compliance that is not practical. How could a Reliability Coordinator, Transmission Operator, Generator Operator, or Balancing Authority, or Distribution Provider fail to have an internal Interpersonal Communication capability for the exchange of operating information and meet operational obligations under other reliability standards?

R12 and R13 as written do not meet the tenants of a results based standard. Specifically they do not focus on required actions or results (the "what"), but rather focus on the methods by which to accomplish actions or results (the "how"). Results based standards require "each requirement to identify a clear and measurable expected outcome, such as: a) a stated level of reliability performance, b) a reduction in a specified reliability risk (prevention), or c) a necessary competency."

R12:

- As a matter of practice RCs and BAs do not have field personnel.
- Is there an example in North American of a Control Center (NERC Glossary term) that does not have some type of Interpersonal Communication capability?
 - If the answer is "yes," then they likely are in violation of COM-001-2.
 - If the answer is "no," then a Requirement to have communication capability between Control Centers has no practical impact.
- It is not clear who would be considered "field personnel" related to the GOP functional role?
 - Are field personnel plant site operators or others doing tasks at the facility considered "field personnel?"
- The NERC Glossary "Control Center" definition, includes "4) a Generator Operator for generation Facilities at two or more locations."
 - A single location with a 1,500 MW Facility may present more risk to the BES than two facilities at multiple locations with a total of 200 MW. However, R12 requires internal communication capability at the less risky location?
- Is it intended that the "or" be an "and?"

*This includes communication capabilities between Control Centers within the same functional entity, **or** between a Control Center and field personnel.*

R13:

- Is there an example in North American of a Distribution Provider control center (NERC Glossary term) that does not have some type of Interpersonal Communication capability?
 - If the answer is "yes," then they likely are in violation of COM-001-2.
 - If the answer is "no," then a Requirement to have communication capability between control centers has no practical impact.
- Is it intended that the "or" be an "and?"

*This includes communication capabilities between Control Centers within the same functional entity, **or** between a Control Center and field personnel.*

Dislikes 0

Response