

Survey Report

Survey Details

Name 2015-07 Internal Communications Capabilities SAR

Description

Start Date 6/11/2015

End Date 7/15/2015

Associated Ballots

Survey Questions

1. Do you agree that the scope and objectives of the SAR 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.

Yes

No

2. If you have any other comments on this SAR that you haven't already mentioned above, please provide them here:

Responses By Question

1. Do you agree that the scope and objectives of the SAR 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.

Kathy Caignon - City of Vineland - 3 -

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Greg Froehling - Rayburn Country Electric Cooperative, Inc. - 3,4,6 - TRE,SPP

Selected Answer: No

Answer Comment:

The defined term used in the currently approved, pending effective standard,

"INTERPERSONAL COMMUNICATION: (FERC Approved, NERC Glossary term, effective 10-01-2015)

Any medium that allows **two or more individuals** to interact, consult, or exchange information."

is sufficient to address the commissions concerns by simply adding clarity to each of the requirements applicable entities.

FERC concerns:

1. "Internal communications capabilities that could involve the issuance or receipt of Operating Instructions or other communications that could have an impact on reliability."
2. "Address the adequacy of internal telecommunications (or other internal communication systems) that may have an adverse effect on reliability, even within a single functional entity, including:

(1) communications between geographically separate control centers within the same functional entity; and

(2) communications between a control center and field personnel."

Examples to add:

R1.3 Reliability Coordinator control centers within the same functional entity.

R3.3 Transmission Operation control centers within the same functional entity.

R3.4 Transmission Operation control centers and field personnel.

R5.6 Balancing Authority control centers within the same functional entity.

R7.3 Distribution Provider control centers within the same functional entity.

R7.4 Distribution Provider control centers and field personnel.

I believe the simple changes outlined above and a "Technical Guide" as mentioned below would address all of the FERC concerns without adding a significant complexity to complying with the standard.

Document Name:

Likes: 0

Dislikes: 0

John Fontenot - Bryan Texas Utilities - 1 -

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Thomas Foltz - AEP - 5 -

Selected Answer: No

Answer Comment:

AEP believes that more specificity is needed in this SAR before we, along with industry, can provide meaningful and insightful feedback. At this point, there is no information regarding what possible changes NERC may consider making to either COM-001-2 or within a new standard. Though the SAR draws verbiage from FERC Order 808, the quotes are rather limited and do not provide specificity on FERC's concerns, nor on how the project plans to address them. We recommend that additional detail be provided in the SAR by either the Standards Committee or eventual drafting team, and re-posted for industry comment.

Document Name:

Likes: 0

Dislikes: 0

Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO

Group Information

Group Name: MRO-NERC Standards Review Forum (NSRF)

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

Voter Information

Voter	Segment
Emily Rousseau	1,2,3,4,5,6
Entity	Region(s)
MRO	MRO

Selected Answer: Yes

Answer Comment:

The NSRF agrees that this Project is to address the “adequacy of communication systems” and not how those systems are used. COM-002-4 covers how entities use and apply systems.

First bullet: Ok

Second and fourth bullet: The physical assets (Communication Systems) should be narrowly focused to those time periods when an Operating Instruction needs to be given.

Third bullet: Ok

Document Name:

Likes: 0

Dislikes: 0

Mike Smith - Manitoba Hydro - 1 -

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable

Group Information

Group Name: ACES Standards Collaborators

Group Member Name	Entity	Region	Segments
Bob Solomon	Hoosier Energy Rural Electric Cooperative, Inc.	RFC	1
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Michael Brytowski	Great River Energy	MRO	1,3,5,6
Jerry McVey	Sunflower Electric Power Corporation	SPP	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Kevin Lyons	Central Iowa Power Cooperative	MRO	1

Voter Information

Voter	Segment
Brian Van Gheem	6
Entity	Region(s)
ACES Power Marketing	NA - Not Applicable

Selected Answer: Yes

Answer Comment: We support the intent of the SAR, as the scope and the objectives both identify the concerns FERC has with internal communications, particularly within the same registered entity. We do have interest in the amount of allowable flexibility that will be available for Alternative Interpersonal Communication capabilities with field personnel, as that could become administratively burdensome with the number of field personnel.

Document Name:

Likes: 0

Dislikes: 0

Scott McGough - Georgia System Operations Corporation - 3 -

Selected Answer: Yes

Answer Comment: Does this FERC directive cover data transfer capabilities (data) as well as interpersonal communications (voice/email)?

Document Name:

Likes: 0

Dislikes: 0

Scott McGough - Georgia System Operations Corporation - 3 -

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Scott McGough - Georgia System Operations Corporation - 3 -

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Scott McGough - Georgia System Operations Corporation - 3 -

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Scott McGough - Georgia System Operations Corporation - 3 -

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Scott McGough - Georgia System Operations Corporation - 3 -

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Scott McGough - Georgia System Operations Corporation - 3 -

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Scott McGough - Georgia System Operations Corporation - 3 -

Selected Answer: Yes

Answer Comment:
none

Document Name:

Likes: 0

Dislikes: 0

Stanley Beasley - Georgia Transmission Corporation - 1 - SERC

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Stanley Beasley - Stanley Beasley - -

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Molly Devine - IDACORP - Idaho Power Company - 1 -

Selected Answer: Yes

Answer Comment: Agree that the scope and objectives of the SAR address the directive in Order No. 808.

Document Name:

Likes: 0

Dislikes: 0

Molly Devine - IDACORP - Idaho Power Company - 1 -

Selected Answer: Yes

Answer Comment: Agree that the scope and objectives of the SAR address the directive in Order No. 808.

Document Name:

Likes: 0

Dislikes: 0

Molly Devine - IDACORP - Idaho Power Company - 1 -

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Molly Devine - IDACORP - Idaho Power Company - 1 -

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Lance Bean - CMS Energy - Consumers Energy Company - 3,4,5 - RFC

Selected Answer: No

Answer Comment:

The STD should consider adding back in some of the requirements from COM-001-1 R1 and R2 . Under the R2 requirements the testing should only be on communication systems not used on a routine day to day operation. Communication systems used in day to day operations should be deemed, Adequate internal communication systems. Only back-up systems should need to be tested The STD will have to define Field Personal when addressing communication systems between control center personal and field personal. On call/call out procedures and cell phones may need to be addressed for field personal communications.

Dean E Fox
Consumers Energy
Supply Operations Training/Compliance Supervisor
517-788-1998

Document Name:

Likes: 0

Dislikes: 0

Leonard Kula - Independent Electricity System Operator - 2 -

Selected Answer: Yes

Answer Comment: We generally agree with the proposed scope and objectives of the SAR, but reserve judgment on the specific changes to the existing COM-001 standard or the proposed requirements in a new standard.

Document Name:

Likes: 0

Dislikes: 0

Leonard Kula - Independent Electricity System Operator - 2 -

Selected Answer: Yes

Answer Comment: We generally agree with the proposed scope and objectives of the SAR, but reserve judgment on the specific changes to the existing COM-001 standard or the proposed requirements in a new standard.

Document Name:

Likes: 0

Dislikes: 0

Mark Wilson - Independent Electricity System Operator - NA - Not Applicable - NPCC

Selected Answer: Yes

Answer Comment: We generally agree with the proposed scope and objectives of the SAR, but reserve judgment on the specific changes to the existing COM-001 standard or the proposed requirements in a new standard.

Document Name:

Likes: 0

Dislikes: 0

christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -

Selected Answer: Yes

Answer Comment: ERCOT supports the comments submitted by the ISO/RTO Council Standards Review Committee.

Document Name:

Likes: 0

Dislikes: 0

christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -

Selected Answer: Yes

Answer Comment: ERCOT supports the comments submitted by the ISO/RTO Council Standards Review Committee.

Document Name:

Likes: 0

Dislikes: 0

Matthew Beilfuss - Wisconsin Energy Corporation - 3,4,5 - RFC

Selected Answer: No

Answer Comment: COM-001-2 currently addresses communication infrastructure and capabilities between discrete functional roles (RC, TOP, BA, GOP, DP). Bullets 1 and 2 of the project scope identify either a geographic location or specific personnel that must be defined when evaluating the adequacy of intra-functional role communication paths. This will add some ambiguity and requires registered entity discretion when identifying the initiator and recipient of the communication. However, on balance this does focus on infrastructure and capabilities.

Bullets 3 and 4 go beyond the scope of a standard focused on infrastructure and capabilities. Both require an entity to classify the nature of the communication, as well as the initiator, recipient, and communication path. Classifying a communication with respect to its impact on “reliable operation of the Bulk Power System” (bullet 3) or if it “could involve the issuance or receipt of Operating Instructions or other communications that could have an impact on reliability”(bullet 4) is highly ambiguous, subject to interpretation, and may change based on conditions. Addressing these issues within the context of an infrastructure standard is misplaced. Additionally, I would presume that entities would naturally consider communications capabilities that support their understood intra-functional role reliability obligations as they would be relied upon for operational purposes other than “reliability”.

Document Name:

Likes: 0

Dislikes: 0

Matthew Beilfuss - Matthew Beilfuss - -

Selected Answer: No

Answer Comment:

COM-001-2 currently addresses communication infrastructure and capabilities between discrete functional roles (RC, TOP, BA, GOP, DP). Bullets 1 and 2 of the project scope identify either a geographic location or specific personnel that must be defined when evaluating the adequacy of intra-functional role communication paths. This will add some ambiguity and requires registered entity discretion when identifying the initiator and recipient of the communication. However, on balance this does focus on infrastructure and capabilities.

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would naturally consider communications capabilities that support their understood intra-functional role reliability obligations as they would be relied upon for operational purposes other than "reliability".

Document Name:

Likes: 0

Dislikes: 0

Tammy Porter - Oncor Electric Delivery - 1 - TRE

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Jared Shakespeare - Peak Reliability - 1 -

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Albert DiCaprio - PJM Interconnection, L.L.C. - 2 - RFC

Group Information

Group Name: ISO Standards Review Committee

Group Member Name	Entity	Region	Segments
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Mark Holman	PJM	RFC	2
Kathleen Goodman	ISONE	NPCC	2
Greg Campoli	NYISO	NPCC	2
Christina V. Bigelow	ERCOT	TRE	2
Ali Miremadi	CAISO	WECC	2
Terry Bilke	MISO	RFC	2

Voter Information

Voter	Segment
Albert DiCaprio	2
Entity	Region(s)
PJM Interconnection, L.L.C.	RFC

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Albert DiCaprio - Albert DiCaprio - -

Error: Subreport could not be shown.

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Albert DiCaprio - PJM Interconnection, L.L.C. - 2 - RFC

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Albert DiCaprio - Albert DiCaprio - -

Error: Subreport could not be shown.

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC

Group Information

Group Name: Duke Energy

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

Voter Information

Voter	Segment
Colby Bellville	1,3,5,6
Entity	Region(s)
Duke Energy	FRCC,SERC,RFC

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Colby Bellville - Colby Bellville - -

Error: Subreport could not be shown.

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Si Truc Phan - Hydro-Qu?bec TransEnergie - 1 - NPCC

Selected Answer: No

Answer Comment: HQT support comments from RSC-NPCC

Document Name:

Likes: 0

Dislikes: 0

Si Truc Phan - Si Truc Phan - -

Selected Answer: No

Answer Comment: HQT supported comments from RSC of NPCC

Document Name:

Likes: 0

Dislikes: 0

Kathleen Black - DTE Energy - 3,4,5 - RFC

Selected Answer: Yes

Answer Comment: Agree that the scope and objectives of the SAR addressing the Directive in Order No. 808, but disagree with the order.

Document Name:

Likes: 0

Dislikes: 0

Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC

Group Information

Group Name: NPCC--Project 2015-07

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5
Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1

Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2

Voter Information

Voter	Segment
Lee Pedowicz	10
Entity	Region(s)
Northeast Power Coordinating Council	NPCC

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Lee Pedowicz - Lee Pedowicz - -

Error: Subreport could not be shown.

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Bob Thomas - Illinois Municipal Electric Agency - 4 -

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP

Group Information

Group Name: SPP Standards Review Group

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool Inc.	SPP	2
Michelle Corley	Cleco Power, LLC	SPP	1,3,5,6
Jason Smith	Southwest Power Pool Inc	SPP	2
Louis Guidry	Cleco Power, LLC	SPP	1,3,5,6
Robert Hirchak	Cleco Corporation	SPP	1,3,5,6
Mike Kiddwell	Empire District Electric Company	SPP	1,3,5
Tara Lightner	Sunflower Electric Power Corporation	SPP	1
Jess Gray	Omaha Public Power District	MRO	3
Gregory McAuley	Oklahoma Gas and Electric Co.	SPP	1,3,5,6
James "Jim" Nail	City of Independence, Missouri	SPP	3,5
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Ashley Stringer	Oklahoma Municipal Power Authority	SPP	4
Don Schmitt	Nebraska Public Power District	MRO	1,3,5
Scott Williams	City Utilities of Springfield	SPP	1,4
Greg Froehling	Rayburn County Electric Cooperative	SPP	3
Jim Dutton	Nebraska Public Power District	MRO	1,3,5
Matt Schell	Nebraska Public Power District	MRO	1,3,5

Voter Information

Voter	Segment
Shannon Mickens	2
Entity	Region(s)
Southwest Power Pool, Inc. (RTO)	SPP

Selected Answer: No

Answer Comment:

We have a concern in reference to the term 'Interpersonal Communication'. The review group feels that there is an uncertainty on the intent of the phrase 'any medium' within the definition. We would like to see more clarity provided on what this phrase is applicable to. Would this phrase be applicable only to real-time communication? Is it just for audible methods or does visual fit the equation? For example in Requirement R9, there is confusion on what is intended by the phrase 'initiate action to repair or designate a replacement'. Additionally in Requirement R10, our concern would be what would be designated as a 'medium' in this process (when does the time start). We would suggest to the drafting team to develop some type of technical documentation that will provide clarity to both the auditor and industry. Also, we would also like to see this technical document vetted and balloted through the industry in reference to the Standard Development Process.

The review group understands that the drafting team has just recently been developed however, we would suggest coordinating efforts with the Alignment of Terms SDT (Project 2015-04). We feel that this collaborative effort would help address any definition concerns. Additionally, we would suggest submitting a SAR to have the term included into other relevant documentation such as the Function Model, Glossary of Terms, and Rules of Procedure (RoP) to ensure that the term is properly aligned.

Finally, we would suggest some alternative language in reference to FERC's concerns pertaining to **COM-001-2**....the recommended language is listed as followed:

R1.3 Reliability Coordinator control centers within the same functional entity.

R3.7 Transmission Operation control centers within the same functional entity.

R3.8 Field Personnel.

R5.6 Balancing Authority control centers within the same functional entity.

R7.3 Distribution Provider control centers within the same functional entity.

R7.4 Distribution Provider control centers and field personnel.

Note to drafting team: We would suggest that phrase 'Field Personnel' not be included into Requirement R4 or Requirement R9 for it will have unrealistic expectations in reference to Alternative Testing pertaining to Internal Communication with Field Personnel.

Document Name:

Likes: 0

Dislikes: 0

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

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

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 1 Hydro One Networks, Inc., 1, Farahbakhsh Payam

Dislikes: 0

Oshani Pathirane - Oshani Pathirane - -

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Payam Farahbakhsh - Hydro One Networks, Inc. - 1 -

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Randall Hubbard - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - FRCC,WECC,TRE,SERC

Group Information

Group Name: Southern Company

Group Member Name	Entity	Region	Segments
Robert Schaffeld	Southern Company Services, Inc..	SERC	1
John Ciza	Southern Company Generation and Energy Marketing	SERC	6
R. Scott Moore	Alabama Power Company	SERC	3
William Shultz	Southern Company Generation	SERC	5

Voter Information

Voter	Segment
Randall Hubbard	1,3,5,6
Entity	Region(s)
Southern Company - Southern Company Services, Inc.	FRCC,WECC,TRE,SERC

Selected Answer: No

Answer Comment:

The SAR currently simply quotes from the FERC order and does not attempt to create a high level outline of what the standard should contain in order to give a future SDT good direction that is industry approved. The SAR should outline some high level objectives to be met by the standard so that the industry can agree on a more defined direction before pen is put to paper to write the actual requirements. An EXAMPLE might be:

- The standard should outlines what communications are and are not in scope
- The standard should requires a primary, secondary, and/or tertiary form of communications capability that are not interdependent and don't rely on the same infrastructure
- The standard should require each communication capability is tested on some periodic basis

Document Name:

Likes: 0

Dislikes: 0

Randall Hubbard - Randall Hubbard - -

Error: Subreport could not be shown.

Selected Answer: No

Answer Comment:

The SAR currently simply quotes from the FERC order and does not attempt to create a high level outline of what the standard should contain in order to give a future SDT good direction that is industry approved. The SAR should outline some high level objectives to be met by the standard so that the industry can agree on a more defined direction before pen is put to paper to write the actual requirements. An EXAMPLE might be:

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- The standard should requires a primary, secondary, and/or tertiary form of communications capability that are not interdependent and don't rely on the same infrastructure
- The standard should require each communication capability is tested on some periodic basis

Document Name:

Likes: 0

Dislikes: 0

Venona Greaff - Oxy - Occidental Chemical - 7 -

Group Information

Group Name: Oxy

Group Member Name	Entity	Region	Segments
Venona Greaff	Occidental Chemical Corporation	SERC	7
Michelle D'Antuono	Ingleside Cogeneration LP.	TRE	5

Voter Information

Voter	Segment
Venona Greaff	7
Entity	Region(s)
Oxy - Occidental Chemical	

Selected Answer: No

Answer Comment:

Occidental Chemical Corporation (OCC) believes that the Standards Authorization Request inappropriately expands the intent of FERC Order 808. In Paragraph 41 of the Order the Commission calls for three specific updates regarding internal communications capability – these are (1) Control Center to Control Center, (2) Control Center to field personnel, and (3) other communications that could directly affect BPS reliability which are fully transacted within a single Functional Entity’s operating footprint.

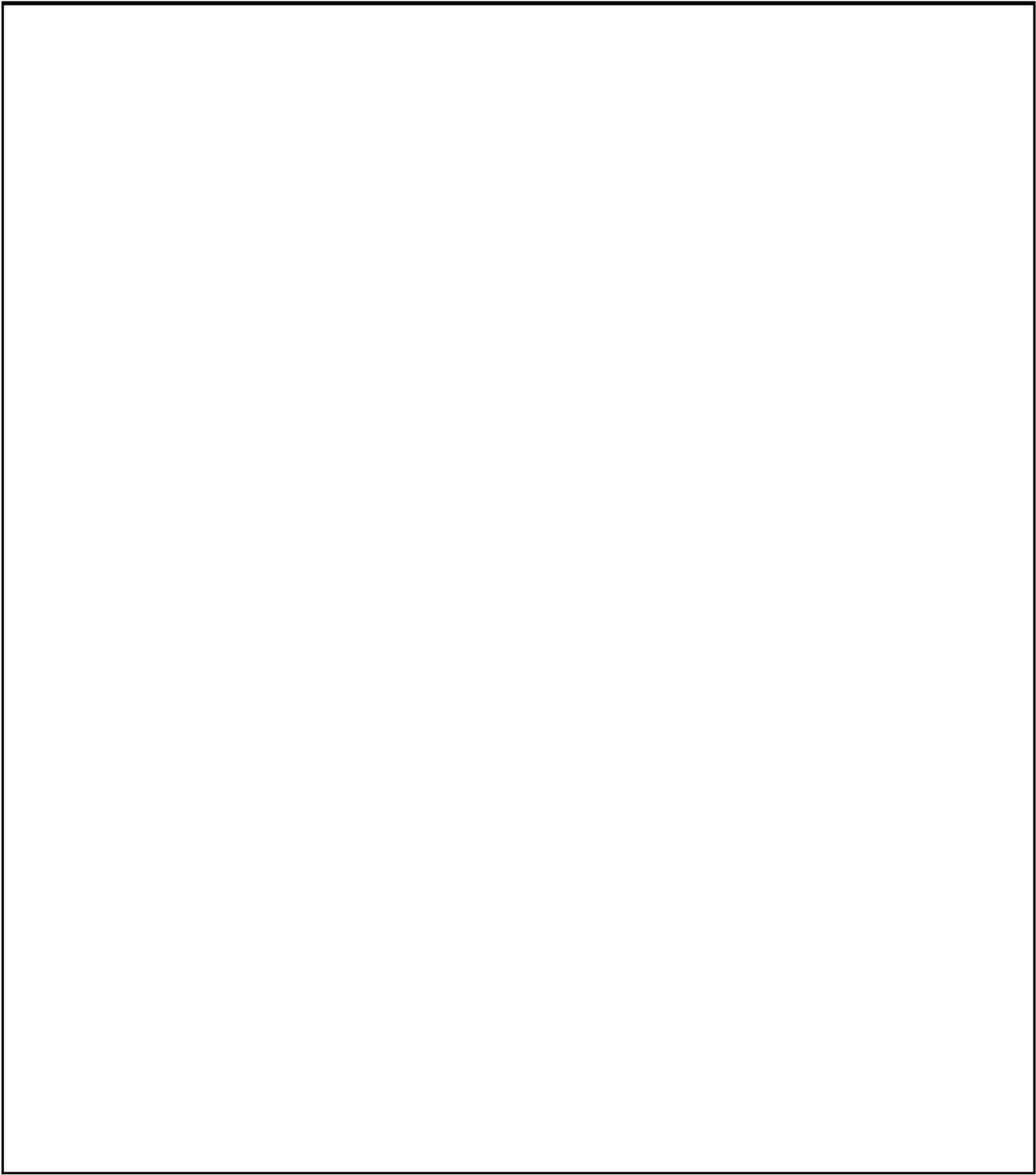
The SAR also references the rule summary in Paragraph 1 of the order which is far more open ended. In particular there was no mention of the “issuance or receipt of Operating Instructions or other communications” in the detailed ruling in Paragraph 41. Those concepts apply to COM-002-4.

OCC believes that the rule summary presented in Paragraph 1 should be removed from the SAR so that the scope of the project is properly limited to FERC’s stated concerns.

Document Name:

Likes: 0

Dislikes: 0



Venona Greaff - Oxy - Occidental Chemical - 7 -

Group Information

Group Name: Oxy

Group Member Name	Entity	Region	Segments
Venona Greaff	Occidental Chemical Corporation	SERC	7
Michelle D'Antuono	Ingleside Cogeneration LP.	TRE	5

Voter Information

Voter	Segment
Venona Greaff	7
Entity	Region(s)
Oxy - Occidental Chemical	

Selected Answer: No

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Venona Greaff - Oxy - Occidental Chemical - 7 -

Selected Answer: No

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

2. If you have any other comments on this SAR that you haven't already mentioned above, please provide them here:

Kathy Caignon - City of Vineland - 3 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Greg Froehling - Rayburn Country Electric Cooperative, Inc. - 3,4,6 - TRE,SPP

Selected Answer:

Answer Comment:

Since a drafting team is being formed... It would be time well spent to develop a "Technical Guide" to explore the expectations of the term "INTERPERSONAL COMMUNICATION". For example is real time communication the expectation or is it within 15 minutes, is it visual or audible communication and lastly common technologies used to achieve those goals.

Document Name:

Likes: 0

Dislikes: 0

John Fontenot - Bryan Texas Utilities - 1 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Thomas Foltz - AEP - 5 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO

Group Information

Group Name: MRO-NERC Standards Review Forum (NSRF)

Group Member Name	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Marie Knox	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Randi Nyholm	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

Voter Information

Voter	Segment
Emily Rousseau	1,2,3,4,5,6
Entity	Region(s)
MRO	MRO

Selected Answer:

Answer Comment:

The NSRF does question the Reliability Functions applicability. There have been other projects that have included the TO since the TO may perform actions that mimic a TOP, ie, switching. The NSRF request that the SAR Team review this prior to the SAR going forward.

Document Name:

Likes: 0

Dislikes: 0

Mike Smith - Manitoba Hydro - 1 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable

Group Information

Group Name: ACES Standards Collaborators

Group Member Name	Entity	Region	Segments
Bob Solomon	Hoosier Energy Rural Electric Cooperative, Inc.	RFC	1
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Michael Brytowski	Great River Energy	MRO	1,3,5,6
Jerry McVey	Sunflower Electric Power Corporation	SPP	1
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5
Kevin Lyons	Central Iowa Power Cooperative	MRO	1

Voter Information

Voter	Segment
Brian Van Gheem	6
Entity	Region(s)
ACES Power Marketing	NA - Not Applicable

Selected Answer:

Answer Comment:

We support the intent of the SAR and have no further comments.

Document Name:

Likes: 0

Dislikes: 0

Scott McGough - Georgia System Operations Corporation - 3 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Scott McGough - Georgia System Operations Corporation - 3 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Scott McGough - Georgia System Operations Corporation - 3 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Scott McGough - Georgia System Operations Corporation - 3 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Scott McGough - Georgia System Operations Corporation - 3 -

Selected Answer:

Answer Comment: Does this FERC directive cover data transfer capabilities (data) as well as interpersonal communications (voice/email)?

Document Name:

Likes: 0

Dislikes: 0

Scott McGough - Georgia System Operations Corporation - 3 -

Selected Answer:

Answer Comment: Does this FERC directive cover data transfer capabilities (data) as well as interpersonal communications (voice/email)?

Document Name:

Likes: 0

Dislikes: 0

Scott McGough - Georgia System Operations Corporation - 3 -

Selected Answer:

Answer Comment:

Does this FERC directive cover data transfer capabilities (data) as well as interpersonal communications (voice/email)?

Document Name:

Likes: 0

Dislikes: 0

Scott McGough - Georgia System Operations Corporation - 3 -

Selected Answer:

Answer Comment:

Does this FERC directive cover data transfer capabilities (data) as well as interpersonal communications (voice/email)?

Document Name:

Likes: 0

Dislikes: 0

Stanley Beasley - Georgia Transmission Corporation - 1 - SERC

Selected Answer:

Answer Comment:

See GSOC comments.

Document Name:

Likes: 0

Dislikes: 0

Stanley Beasley - Stanley Beasley - -

Selected Answer:

Answer Comment: See GSOC comments

Document Name:

Likes: 0

Dislikes: 0

Molly Devine - IDACORP - Idaho Power Company - 1 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Molly Devine - IDACORP - Idaho Power Company - 1 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Molly Devine - IDACORP - Idaho Power Company - 1 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Molly Devine - IDACORP - Idaho Power Company - 1 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Lance Bean - CMS Energy - Consumers Energy Company - 3,4,5 - RFC

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Leonard Kula - Independent Electricity System Operator - 2 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Leonard Kula - Independent Electricity System Operator - 2 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Mark Wilson - Independent Electricity System Operator - NA - Not Applicable - NPCC

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -

Selected Answer:

Answer Comment: ERCOT supports the comments submitted by the ISO/RTO Council Standards Review Committee.

Document Name:

Likes: 0

Dislikes: 0

christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -

Selected Answer:

Answer Comment: ERCOT supports the comments submitted by the ISO/RTO Council Standards Review Committee.

Document Name:

Likes: 0

Dislikes: 0

Matthew Beilfuss - Wisconsin Energy Corporation - 3,4,5 - RFC

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Matthew Beilfuss - Matthew Beilfuss - -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Tammy Porter - Oncor Electric Delivery - 1 - TRE

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Jared Shakespeare - Peak Reliability - 1 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Albert DiCaprio - PJM Interconnection, L.L.C. - 2 - RFC

Group Information

Group Name: ISO Standards Review Committee

Group Member Name	Entity	Region	Segments
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Mark Holman	PJM	RFC	2
Kathleen Goodman	ISONE	NPCC	2
Greg Campoli	NYISO	NPCC	2
Christina V. Bigelow	ERCOT	TRE	2
Ali Miremadi	CAISO	WECC	2
Terry Bilke	MISO	RFC	2

Voter Information

Voter	Segment
Albert DiCaprio	2
Entity	Region(s)
PJM Interconnection, L.L.C.	RFC

Selected Answer:

Answer Comment:

The SDT could enhance the clarity of the Project by replacing the phrase “internal communications” with another phrase such as “communications between personnel that are not physically co-located”. This addition would ensure that the new requirement(s) applies explicitly and only to internal communications:

- between geographically separate control centers within the same functional entity, or*
- between a control center and field personnel.*

Although the SAR does identify these two objectives, the SAR does not limit itself to just those two objectives. This leaves the SAR ambiguous as regard to internal communications between two people sitting next to one another. The SRC

recommends that the SDT implement the revision above or other revisions to reduce the potential for ambiguity.

The SRC would also suggest that the phrase “adequacy of internal communications capability” be clarified. Is this phrase intended to refer to creation of a requirement that the hardware can adequately handle a conversation, or is it being used in the more generic sense that any new requirement must be adequate to address the two bullet points referenced above?

Document Name:

Likes: 0

Dislikes: 0

Albert DiCaprio - Albert DiCaprio - -

Error: Subreport could not be shown.

Selected Answer:

Answer Comment:

The SDT could enhance the clarity of the Project by replacing the phrase "internal communications" with another phrase such as "communications between personnel that are not physically co-located". This addition would ensure that the new requirement(s) applies explicitly and only to internal communications:

{C}- between geographically separate control centers within the same functional entity, or

{C}- between a control center and field personnel.

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Document Name:

Likes: 0

Dislikes: 0

Albert DiCaprio - PJM Interconnection, L.L.C. - 2 - RFC

Selected Answer:

Answer Comment:

The SDT could enhance the clarity of the Project by replacing the phrase “internal communications” with another phrase such as “communications between personnel that are not physically co-located”. This addition would ensure that the new requirement(s) applies explicitly and only to internal communications:

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Document Name:

Likes: 0

Dislikes: 0

Albert DiCaprio - Albert DiCaprio - -

Error: Subreport could not be shown.

Selected Answer:

Answer Comment:

The SDT could enhance the clarity of the Project by replacing the phrase "internal communications" with another phrase such as "communications between personnel that are not physically co-located". This addition would ensure that the new requirement(s) applies explicitly and only to internal communications:

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{C}- between a control center and field personnel.

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Document Name:

Likes: 0

Dislikes: 0

Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC

Group Information

Group Name: Duke Energy

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

Voter Information

Voter	Segment
Colby Bellville	1,3,5,6
Entity	Region(s)
Duke Energy	FRCC,SERC,RFC

Selected Answer:

Answer Comment:

-Duke Energy requests further clarification from the SDT on how “adequacy” specifically, “adequacy of internal communications capability” will be measured. It is possible that what is considered adequate by one entity may not be to another, and thus could create a challenging climate to measure compliance with.

-Also, we request clarification on the usage of the term “control centers”. Is it the SDT’s intent to consider the use of the definition of “control center” from the currently effective COM-001-2 standard, or are we to consider using the definition of “Control Center” from the NERC Glossary of Terms? The terms have different definitions/meanings, and without this clarification, could result in varying interpretations throughout the industry.

-Lastly, we request clarification that the standard is only applicable to Functional Entities who operate at the BES level. In Order 808, FERC used the term “Bulk Power System,” this could be interpreted as a changing of the applicability to sub-BES levels (below 100kV Facilities not identified as BES). If this proposed revision/new standard is to be interpreted at sub-BES levels, then would a Distribution Provider be required to maintain internal communications procedures with distribution field personnel who are not

responsible for performing activities that affect the BES? Please advise as to whether the intent is to change the level of applicability.

Document Name:

Likes: 0

Dislikes: 0

Colby Bellville - Colby Bellville - -

Error: Subreport could not be shown.

Selected Answer:

Answer Comment:

Duke Energy requests further clarification from the SDT on how “adequacy” specifically, “adequacy of internal communications capability” will be measured. It is possible that what is considered adequate by one entity may not be to another, and thus could create a challenging climate to measure compliance with.

Also, we request clarification on the usage of the term “control centers”. Is it the SDT’s intent to consider the use of the definition of “control center” from the currently effective COM-001-2 standard, or are we to consider using the definition of “Control Center” from the NERC Glossary of Terms? The terms have different definitions/meanings, and without this clarification, could result in varying interpretations throughout the industry.

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Document Name:

Likes: 0

Dislikes: 0

Si Truc Phan - Hydro-Qu?bec TransEnergie - 1 - NPCC

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Si Truc Phan - Si Truc Phan - -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Kathleen Black - DTE Energy - 3,4,5 - RFC

Selected Answer:

Answer Comment:

There is concern about the scope of this project. Internal communications between separate control centers within the same functional entity could include communications on market issues and operational issues such as equipment status updates. It looks like we may be going down a road requiring 3 way communications for these type of communications. We do not believe 3 way communication is required for separate control centers within the same functional entity. Other than what is already required for switching orders, we do not believe 3 way communication is required for communications between a control and field personnel. Where do you draw the line for these types of communications? If this change is for only those communications that may have an adverse effect on reliability, then the change should state "for internal communications regarding

reliability directives". Without this type of clarification, how can evidence be provided to show compliance?

Document Name:

Likes: 0

Dislikes: 0

Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC

Group Information

Group Name: NPCC--Project 2015-07

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Alan MacNaughton	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5
Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1

Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Kathleen Goodman	ISO - New England	NPCC	2

Voter Information

Voter	Segment
Lee Pedowicz	10
Entity	Region(s)
Northeast Power Coordinating Council	NPCC

Selected Answer:

Answer Comment:

Any requirements must be sure to directly and unequivocally address internal communications capabilities that support making a Real-time Assessment of the BES.

Document Name:

Likes: 0

Dislikes: 0

Lee Pedowicz - Lee Pedowicz - -

Error: Subreport could not be shown.

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Bob Thomas - Illinois Municipal Electric Agency - 4 -

Selected Answer:

Answer Comment:

There is a need to minimize directives to further modify NERC-approved reliability standards given the impact on compliance resources (standards development tracking, implementation of the revised standard, revision of established compliance procedures, documentation and implementation of new internal controls, etc.). A FERC directive should be supported by information/data that there is an actual gap/problem (i.e., risk to reliability of the BES/BPS) that has occurred often enough to warrant further standards development/revision. The COM-001-2 SAR is an example of a FERC directive to address a perceived gap that does not appear to be supported by information/data that inadequate internal communications capabilities have actually produced a material risk to the BPS. If a requirement(s) specifying internal communications capabilities is deemed necessary, it should not apply to Distribution Provider.

Document Name:

Likes: 0

Dislikes: 0

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP

Group Information

Group Name: SPP Standards Review Group

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool Inc.	SPP	2
Michelle Corley	Cleco Power, LLC	SPP	1,3,5,6
Jason Smith	Southwest Power Pool Inc	SPP	2
Louis Guidry	Cleco Power, LLC	SPP	1,3,5,6
Robert Hirchak	Cleco Corporation	SPP	1,3,5,6
Mike Kiddwell	Empire District Electric Company	SPP	1,3,5
Tara Lightner	Sunflower Electric Power Corporation	SPP	1
Jess Gray	Omaha Public Power District	MRO	3
Gregory McAuley	Oklahoma Gas and Electric Co.	SPP	1,3,5,6
James "Jim" Nail	City of Independence, Missouri	SPP	3,5
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Ashley Stringer	Oklahoma Municipal Power Authority	SPP	4
Don Schmitt	Nebraska Public Power District	MRO	1,3,5
Scott Williams	City Utilities of Springfield	SPP	1,4
Greg Froehling	Rayburn County Electric Cooperative	SPP	3
Jim Dutton	Nebraska Public Power District	MRO	1,3,5
Matt Schell	Nebraska Public Power District	MRO	1,3,5

Voter Information

Voter	Segment
Shannon Mickens	2
Entity	Region(s)
Southwest Power Pool, Inc. (RTO)	SPP

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC

Selected Answer:

Answer Comment: N/A

Document Name:

Likes: 0

Dislikes: 0

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

Selected Answer:

Answer Comment: Hydro One Networks Inc. noted a few minor technicalities:

1. In the "Purpose" section, the quoted text does not appear per verbatim out of the FERC Order, and should instead read, "*internal communications capabilities **to the extent that such communications** could involve the issuance or receipt of Operating Instructions or other communications that could have an impact on reliability.*"

2. In the "SAR Information" section, the quoted text does not appear per verbatim out of the FERC Order, and should instead read, "*internal communications capabilities **to the extent that such communications** could involve the issuance or receipt of Operating Instructions or other communications that could have an impact on reliability.*"

Document Name:

Likes: 1 Hydro One Networks, Inc., 1, Farahbakhsh Payam

Dislikes: 0

Oshani Pathirane - Oshani Pathirane - -

Selected Answer:

Answer Comment:

Hydro One Networks Inc. noted a few minor technicalities:

1. In the "Purpose" section, the quoted text does not appear per verbatim out of the Order, and should instead read, "*internal communications capabilities **to the extent that such communications** could involve the issuance or receipt of Operating Instructions or other communications that could have an impact on reliability.*"

2. In the "SAR Information" section, the quoted text does not appear per verbatim out of the Order, and should instead read, "*internal communications capabilities **to the extent that such communications** could involve the issuance or receipt of Operating Instructions or other communications that could have an impact on reliability.*"

Document Name:

Likes: 1 Hydro One Networks, Inc., 1, Farahbakhsh Payam

Dislikes: 0

Payam Farahbakhsh - Hydro One Networks, Inc. - 1 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Randall Hubbard - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - FRCC,WECC,TRE,SERC

Group Information

Group Name: Southern Company

Group Member Name	Entity	Region	Segments
Robert Schaffeld	Southern Company Services, Inc..	SERC	1
John Ciza	Southern Company Generation and Energy Marketing	SERC	6
R. Scott Moore	Alabama Power Company	SERC	3
William Shultz	Southern Company Generation	SERC	5

Voter Information

Voter	Segment
Randall Hubbard	1,3,5,6
Entity	Region(s)
Southern Company - Southern Company Services, Inc.	FRCC,WECC,TRE,SERC

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Randall Hubbard - Randall Hubbard - -

Error: Subreport could not be shown.

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Venona Greaff - Oxy - Occidental Chemical - 7 -

Group Information

Group Name: Oxy

Group Member Name	Entity	Region	Segments
Venona Greaff	Occidental Chemical Corporation	SERC	7
Michelle D'Antuono	Ingleside Cogeneration LP.	TRE	5

Voter Information

Voter	Segment
Venona Greaff	7
Entity	Region(s)
Oxy - Occidental Chemical	

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Venona Greaff - Oxy - Occidental Chemical - 7 -

Group Information

Group Name: Oxy

Group Member Name	Entity	Region	Segments
Venona Greaff	Occidental Chemical Corporation	SERC	7
Michelle D'Antuono	Ingleside Cogeneration LP.	TRE	5

Voter Information

Voter	Segment
Venona Greaff	7
Entity	Region(s)
Oxy - Occidental Chemical	

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

Venona Greaff - Oxy - Occidental Chemical - 7 -

Selected Answer:

Answer Comment:

Document Name:

Likes: 0

Dislikes: 0

