Unofficial Comment Form

Reliability Coordination (Project 2006-06)

Please **DO NOT** use this form to submit comments. Please use the [electronic comment form](https://www.nerc.net/nercsurvey/Survey.aspx?s=bbe7ef0088ef44cb8a16b1c8ee6e0939) to submit comments on the first formal posting for Project 2006-06—Reliability Coordination. The electronic comment form must be completed by July 6, 2012**.**

[2006-06 Project Page](http://www.nerc.com/filez/standards/Reliability_Coordination_Project_2006-6.html)

If you have questions please contact Scott Barfield-McGinnis at scott.barfield@nerc.net or by telephone at 404-446-9689.

**Background**

The RCSDT has revised the COM-001-2 standard based on stakeholder comments received during the successive ballot, formal comment period and quality review of the standard.

The two proposed definitions remain the same, except letter “s” on “Communications” the definition of Alternative Interpersonal Communication to make it singular. The RCSDT has addressed comments on the Purpose statement to align it with the intent of requiring entities to have communication capability. The effective date language was updated to reflect the current guidelines for standards.

**Purpose:** To establish Interpersonal Communication capabilities necessary to maintain reliability.

Several commenters had suggestions for improvements to the language in the requirements. The RCSDT addressed the use of “Adjacent…” starting requirements and giving the appearance of a defined glossary term by rephrasing the occurrence with “Each adjacent…” Other corrections include using the singular rather than plural for clarity.

Several commenters raised concerns about the use of “…synchronously connected within the same interconnection.” To address this, the RCSDT shortened the two requirements using this phrase to “…synchronously connected” and added an a corresponding additional requirement to each to address DC connections. See the following Requirement Parts below:

**3.5.** Each adjacent Transmission Operator synchronously connected. (Revised)

**3.6.** Each adjacent Transmission Operator asynchronously connected. (New)

**4.3.** Each adjacent Transmission Operator synchronously connected. (Revised)

**4.4.** Each adjacent Transmission Operator asynchronously connected. (New)

Some commenters had concerns about conditions of non-compliance if the entity’s Interpersonal Communication capability failed. To address this concern, the RCSDT added conforming language to Requirements R1, R3, R5, R7 and R8 that bridges the potential gap in non-compliance for a failed Interpersonal Communication capability. The VSLs were updated to reflect this change.

Requirement R10 was revised to remove R1-R6 and more accurately use R1, R3, and R5. Requirement R11 was revised the phrase “mutually agreeable time” to remove the word “time” and replace it with “action.” The Measures M10 and M11 were also corrected. Additionally, the bullets in Measures M1-M8 were cleaned up for clarity. All of the examples of evidence in the Measures were reformatted and cleaned up to more accurately reflect the scope of each requirement.

Based on comments received, the Compliance Section 1.1, Compliance Enforcement Authority, was updated to reflect the current guidelines for standards. Additionally, Section 1.3, Data Retention, was updated to reflect the current guidelines for standards and the bulleted items reformatted for clarity.

The VSLs were updated to make singular, note the applicable Requirement number, and to add the Parts 3.6 and 4.4 due to being added to the requirements, R3 and R4. Additionally, the RCSDT added High VSLs for Requirements R1 through R8 to conform with VSL Guidelines. Requirements R1 through R8 are not binary only.

**You do not have to answer all questions. Enter all comments in Simple Text Format.**

1. The RCSDT has revised the parts of Requirements R1, R2, R3, R4, R5, and R6 of COM-001-2 that began only with “Adjacent…” to begin with “Each adjacent…” to avoid the appearance of creating a defined glossary phrase. Do you agree with the changes? If not, please explain in the comment area below.

[ ]  Yes

[ ]  No

Comments:

1. The RCSDT has revised parts of two requirements (Parts 3.5 and 4.3) in COM-001-2 and added two additional parts (Parts 3.6 and 3.4) to address concerns about the phrase “synchronously connected within the same Interconnection.” Do you agree these changes address concerns where entities might only be adjacent across an Interconnection for where connected by a Direct Current (DC) tie? If not, please explain in the comment area below.

[ ]  Yes

[ ]  No

Comments:

1. The RCSDT made minor changes and reformatted the evidence examples in the Measures of COM-001-2 for greater clarity. Do you agree with these revisions? If not, please explain in the comment area below.

[ ]  Yes

[ ]  No

Comments:

1. Do you have any other comments on COM-001-2, not expressed in questions above, for the RCSDT?

Comments: