

## **Consideration of Comments on Interpretation of COM-002-2 — Project 2009-22**

The Interpretation of COM-002-2 Drafting Team thanks all commenters who submitted comments on the Interpretation of COM-002-2 — Communication and Coordination R2 for the ISO/RTO Council (Project 2009-22). These standards were posted for a 30-day public comment period from November 18, 2010 through December 18, 2010. The stakeholders were asked to provide feedback on the standards through a special Electronic Comment Form. There were 33 sets of comments, including comments from 92 different people from approximately 79 companies representing 8 of the 10 Industry Segments as shown in the table on the following pages.

[http://www.nerc.com/filez/standards/Project2009-22\\_RFI\\_COM-002-2\\_R2\\_IRC.html](http://www.nerc.com/filez/standards/Project2009-22_RFI_COM-002-2_R2_IRC.html)

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Vice President and Director of Standards, Herb Schrayshuen, at 404-446-2560 or at [herb.schrayshuen@nerc.net](mailto:herb.schrayshuen@nerc.net). In addition, there is a NERC Reliability Standards Appeals Process.<sup>1</sup>

### General Summary of SDT Consideration of Comments

The majority of Comments on Question 1 agree this request for an interpretation is asking for clarity on the meaning of a requirement or clarity on the application of a requirement. The SDT did not provide extensive responses, as the comments did not raise any significant concerns or questions.

The majority of comments on Question 2 agree (26 – yes, 6 – no) that the first draft interpretation does not expand the reach of the standard. Several commenters indicated the sentence “routine operating instructions can be directives” added confusion to the standard. The team deleted this phrase.

There were a few comments that the first draft interpretation expanded on the Requirement. These commenters indicated that because “directive” is not defined in the NERC Glossary of Terms, defining it in the interpretation would expand on the approved standard. By deleting the phrase as described above, the SDT believes they have addressed these concerns.

A slight majority of the Commenters agreed (17 – yes, 15 – no) with this interpretation. Many of the commenters that disagreed with the interpretation recommended removing the sentence “Routine operating instructions can be directives.” The sentence has been removed by the SDT in the current draft interpretation.

Many commenters recommended that the team replace the clause “during a real-time emergency” with “to prevent or resolve a real-time emergency.” The SDT noted this but

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<sup>1</sup> The appeals process is in the Standard Processes Manual:  
[http://www.nerc.com/docs/standards/sc/Standard\\_Processes\\_Manual\\_Approved\\_May\\_2010.pdf](http://www.nerc.com/docs/standards/sc/Standard_Processes_Manual_Approved_May_2010.pdf).

modified "during a real-time emergency" to "to address a real-time emergency" to be consistent with the purpose statement and to address this concern.

One commenter stated NERC Standard COM-002-2 has two separate and distinct purpose statements. The SDT respectfully disagreed and believes that the purpose statement is not two separate and distinct purpose statements, but one purpose statement.

A few commenters felt that interpretation response regarding electronic communications does not add to the response, and suggested that the last sentence of the interpretation be removed. The SDT agreed, and removed the last sentence of the interpretation as it went beyond the question asked.

## **Index to Questions, Comments, and Responses**

1. The NERC Board of Trustees indicated that the interpretation process should not be used to address requests for a decision on "how" a reliability standard applies to a registered entity's particular facts and circumstances. Do you believe this request for an interpretation is asking for clarity on the meaning of a requirement or clarity on the application of a requirement?.....8
2. The NERC Board of Trustees indicated that in deciding whether or not to approve a proposed interpretation, it will use a standard of strict construction and not seek to expand the reach of the standard to correct a perceived gap or deficiency in the standard. Do you believe this interpretation expands the reach of the standard?.....15
3. Do you agree with this interpretation? If not, why not.....23

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The Industry Segments are:

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

Group/Individual		Commenter	Organization		Registered Ballot Body Segment										
					1	2	3	4	5	6	7	8	9	10	
1.	Group	Gerald Beckerle	SERC OC Standards Review Group		X		X								
<b>Additional Member Additional Organization Region Segment Selection</b>															
1.	Matt Kirk	BREC	SERC	1, 3, 5, 9											
2.	Robert Thomasson	BREC	SERC	1, 3, 5, 9											
3.	Shardra Scott	Gulf Power	SERC	1, 3, 5											
4.	Sam Holeman	Duke Energy	SERC	1, 3, 5											
5.	Joel Wise	TVA	RFC	1, 3, 5, 9											
6.	Brad Young	LGE/KU	SERC	1, 3, 5											
7.	Andy Burch	EEI	SERC	1, 5											
8.	Glenn Stephens	SCPSA	SERC	1, 3, 5, 9											
9.	Merritt Castello	Mississippi	SERC	1, 3, 5											
10.	Chris Bolick	AECI	SERC	1, 3, 5											
11.	Gene Delk	SCE&G	SERC	1, 3, 5											
12.	John Rembold	SIPC	SERC	1, 3, 5											
13.	Tim Hattaway	PowerSouth	SERC	1, 3, 5, 9											
14.	Timmy LeJeune	La Generating	SERC	1, 3, 5											
15.	Gary Hutson	SMEPA	SERC	1, 3, 5, 9											

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						1	2	3	4	5	6	7	8	9	10
16.	Shaun Anders	CWLP	SERC	1, 3, 5, 9											
2.	Group	Terry L. Blackwell	Santee Cooper	X		X		X	X						
Additional Member		Additional Organization		Region	Segment Selection										
1.	S. Tom Abrams	Santee Cooper	SERC	1											
2.	Rene' Free	Santee Cooper	SERC	1											
3.	Glenn Stephens	Santee Cooper	SERC	1											
4.	Jim Peterson	Santee Cooper	SERC	1											
5.	Vicky Budreau	Santee Cooper	SERC	1											
6.	Wayne Ahl	Santee Cooper	SERC	1											
3.	Group	Mike Garton	Electric Market Policy	X		X		X	X						
Additional Member		Additional Organization		Region	Segment Selection										
1.	Michael Gildea	Dominion Resources Services, Inc.	NPCC	4											
2.	Louis Slade	Dominion Resources Services, Inc.	SERC	4, 5											
3.	John Loftis	Dominion Virginia Power	SERC	1, 3											
4.	Group	Carol Gerou	MRO's NERC Standards Review Subcommittee												X
Additional Member		Additional Organization		Region	Segment Selection										
1.	Mahmood Safi	Omaha Public Utility District	MRO	1, 3, 5, 6											
2.	Chuck Lawrence	American Transmission Company	MRO	1											
3.	Tom Webb	Wisconsin Public Service Corporation	MRO	3, 4, 5, 6											
4.	Jason Marshall	Midwest ISO Inc.	MRO	2											
5.	Jodi Jenson	Western Area Power Administration	MRO	1, 6											
6.	Ken Goldsmith	Alliant Energy	MRO	4											
7.	Alice Ireland	Xcel Energy	MRO	1, 3, 5, 6											
8.	Dave Rudolph	Basin Electric Power Cooperative	MRO	1, 3, 5, 6											
9.	Eric Ruskamp	Lincoln Electric System	MRO	1, 3, 5, 6											
10.	Joseph Knight	Great River Energy	MRO	1, 3, 5, 6											

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11.	Joe DePoorter	Madison Gas & Electric	MRO	3, 4, 5, 6																																																																																																																																											
12.	Scott Nickels	Rochester Public Utilities	MRO	4																																																																																																																																											
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14.	Richard Burt	Minnkota Power Cooperative, Inc.	MRO	1, 3, 5, 6																																																																																																																																											
5.	Group	Denise Koehn	Bonneville Power Administration		X		X		X	X																																																																																																																																					
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8.	Group	Jason Marshall	Midwest ISO Standards Collaborators			X																																																																																																																																									

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<b>Additional Member Additional Organization Region Segment Selection</b>															
1.	Joe Knight	Great River Energy	MRO	1, 3, 5, 6											
2.	Joe O'brien	NIPSCO	RFC	1, 3, 5, 6											
3.	Terry Harbour	Midamerican Energy	MRO	1											
4.	Rick Liljegren	Minnesota Power		1											
5.	Kirit Shah	Ameren	SERC	1											
9.	Individual	Sandra Shaffer		PaciFiCorp		X		X		X	X				
10.	Individual	Mace Hunter		Lakeland Electric		X		X		X					
11.	Individual	Brent Ingebrigtsen		LG&E and KU Energy LLC				X							
12.	Individual	Richard Salgo		NV Energy		X									
13.	Individual	Joe O'Brien		NIPSCO		X		X		X	X				
14.	Individual	David Thorne		Pepco		X									
15.	Individual	Dan Roethemeyer		Dynegy Inc.						X					
16.	Individual	Jeanie Doty		City of Austin dba Austin Energy		X									
17.	Individual	Melissa Kurtz		US Army Corps of Engineers - Omaha District		X				X					
18.	Individual	Doug Hohlbaugh		FirstEnergy		X		X	X	X	X				
19.	Individual	Gregory Miller		BGE		X									
20.	Individual	Andrew Puszta		American Transmission Company		X									

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Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
21.	Individual	Chris Scanlon	Exelon	X		X		X	X				
22.	Individual	Kathleen Goodman	ISO New England Inc.		X								
23.	Individual	Greg Rowland	Duke Energy	X		X			X				
24.	Individual	Christine Hasha	Electric Reliability Council of Texas, Inc.		X								
25.	Individual	Jonathan Appelbaum	United Illuminating Company	X									
26.	Individual	Brenda Powell	Constellation Energy Commodities Gruop							X			
27.	Individual	Amir Hammad	Constellation Power Generation						X				
28.	Individual	Dan Rochester	Independent Electricity System Operator		X								
29.	Individual	Thad Ness	American Electric Power	X		X		X	X				
30.	Individual	Saurabh Saksena	National Grid	X		X							
31.	Individual	Edward Davis	Entergy Services	X		X		X	X				
32.	Individual	Kenneth A. Goldsmith	Alliant Energy				X						
33.	Individual	Joe Petaski	Manitoba Hydro	X		X		X	X				

1. The NERC Board of Trustees indicated that the interpretation process should not be used to address requests for a decision on “how” a reliability standard applies to a registered entity’s particular facts and circumstances. Do you believe this request for an interpretation is asking for clarity on the meaning of a requirement or clarity on the application of a requirement?

**Summary Consideration:** There were 33 commenters of which there were 2 abstentions. 26 responded clarity of meaning, and 5 responded clarity of application. The majority of comments agree that the request is asking for clarity on the meaning of the requirement, and therefore is appropriate within the Board guidelines for an interpretation.

The SDT thanked the commenters for the comments and did not offer any additional responses as no questions were raised and the majority of the commenters agreed that this request for an interpretation is asking for clarity on meaning of a requirement and not on “how” a reliability standard applies to a registered entity’s particular facts and circumstance.

Organization	Yes or No	Question 1 Comment
SERC OC Standards Review Group	The request is asking for clarity on the meaning of a requirement.	
Santee Cooper	The request is asking for clarity on the meaning of a requirement.	
Electric Market Policy	The request is asking for clarity on the	

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Organization	Yes or No	Question 1 Comment
	application of a requirement.	
MRO's NERC Standards Review Subcommittee	The request is asking for clarity on the application of a requirement.	
Bonneville Power Administration	The request is asking for clarity on the meaning of a requirement.	
Kansas City Power & Light	The request is asking for clarity on the meaning of a requirement.	
IRC Standards Review Committee	The request is asking for clarity on the meaning of a requirement.	
Midwest ISO Standards Collaborators	The request is asking for clarity on	

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Organization	Yes or No	Question 1 Comment
	the meaning of a requirement.	
PacifiCorp	The request is asking for clarity on the meaning of a requirement.	
Lakeland Electric	The request is asking for clarity on the application of a requirement.	Lakeland Electric supports the drafting team's interpretation and agrees that "routine operating instructions during normal operations would not require the communications protocols for repeat backs as specified in R2".
<b>Response:</b> The SDT thanks you for your comments.		
LG&E and KU Energy LLC	The request is asking for clarity on the meaning of a requirement.	
NV Energy	The request is asking for clarity on the application of a requirement.	This request refers to the applicability of the stated requirement to "routine operating instructions".

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Organization	Yes or No	Question 1 Comment
<b>Response:</b> The SDT thanks you for your comments.		
NIPSCO	The request is asking for clarity on the application of a requirement.	I believe this request is related to general applicability and not to an entity's particular facts or circumstances. Therefore this is a reasonable request.
<b>Response:</b> The SDT thanks you for your comments.		
Pepco	The request is asking for clarity on the meaning of a requirement.	Part of the Request for Interpretation is asking clarity on the meaning of the requirement, whether "directives" are limited to emergency conditions or include routine/non-emergency conditions. The second part of the request is asking clarity on the application of the requirement, whether electronic instructions during emergency conditions require adherence to the same protocol.
<b>Response:</b> The SDT thanks you for your comments.		
Dynegy Inc.	The request is asking for clarity on the meaning of a requirement.	
City of Austin dba Austin Energy	The request is asking for clarity on the meaning of a requirement.	

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Organization	Yes or No	Question 1 Comment
US Army Corps of Engineers - Omaha District	The request is asking for clarity on the meaning of a requirement.	
FirstEnergy	The request is asking for clarity on the meaning of a requirement.	
BGE		No comment.
American Transmission Company	The request is asking for clarity on the meaning of a requirement.	
Exelon	The request is asking for clarity on the meaning of a requirement.	
ISO New England Inc.	The request is asking for clarity on the meaning of a	

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Organization	Yes or No	Question 1 Comment
	requirement.	
Duke Energy	The request is asking for clarity on the meaning of a requirement.	
Electric Reliability Council of Texas, Inc.	The request is asking for clarity on the meaning of a requirement.	
United Illuminating Company	The request is asking for clarity on the meaning of a requirement.	
Constellation Energy Commodities Group	The request is asking for clarity on the meaning of a requirement.	
Constellation Power Generation	The request is asking for clarity on the meaning of a requirement.	

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Organization	Yes or No	Question 1 Comment
Independent Electricity System Operator		This question is difficult to answer definitively. We believe that the request is to provide clarity on the meaning of the requirement, but perhaps more so, to provide clarity on the circumstances under which the requirement to use 3-part communication would apply (i.e the "When").
<b>Response:</b> The SDT thanks you for your comments.		
American Electric Power	The request is asking for clarity on the meaning of a requirement.	
National Grid	The request is asking for clarity on the meaning of a requirement.	
Entergy Services	The request is asking for clarity on the meaning of a requirement.	
Alliant Energy	The request is asking for clarity on the meaning of a requirement.	
Manitoba Hydro	The request is asking for	The request is asking for both clarity on meaning and application.

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Organization	Yes or No	Question 1 Comment
	clarity on the meaning of a requirement.	
<b>Response:</b> The SDT thanks you for your comments.		

2. The NERC Board of Trustees indicated that in deciding whether or not to approve a proposed interpretation, it will use a standard of strict construction and not seek to expand the reach of the standard to correct a perceived gap or deficiency in the standard. Do you believe this interpretation expands the reach of the standard?

**Summary Consideration:**

There were 33 commenters, of which there was 1 abstention. 26 responded the interpretation did not expand the reach of the standard, and 6 responded the interpretation expands the reach of the standard.

Many comments suggested the statement “routine operating instructions can be directives” added confusion. The SDT agreed, and elected to remove this language.

One commenter suggested the interpretation expands the reach of the standard by stating what a “directive” might be, which is not defined in the NERC Glossary of Terms. The remainder of the comments agreed that the interpretation did not expand the reach of the standard, so the team elected to not make any changes.

Organization	Yes or No	Question 2 Comment
SERC OC Standards Review Group	The interpretation does not expand the reach of the standard.	We believe that the interpretation team took a strict construction view of COM-002-2.
<b>Response:</b> The SDT thanks you for your comments.		
Santee Cooper	The interpretation does not	

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Organization	Yes or No	Question 2 Comment
	expand the reach of the standard.	
Electric Market Policy	The interpretation does not expand the reach of the standard.	
MRO's NERC Standards Review Subcommittee	The interpretation does not expand the reach of the standard.	
Bonneville Power Administration	The interpretation does not expand the reach of the standard.	
Kansas City Power & Light	The interpretation does not expand the reach of the standard.	
IRC Standards Review Committee	The interpretation expands the reach of the	The draft interpretation appropriately clarifies that the requirement must fit within the context of the purpose statement. The original intent in the NERC Operating Policies, which was translated into Version 0, was that routine operating instructions do not require 3-part communication. The interpretation, however, implies that non-emergency communications may be audited as requiring 3-part communication, if the system operator

**Consideration of Comments on Interpretation of COM-002-2 — Project 2009-22**

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Organization	Yes or No	Question 2 Comment
	standard.	issues a directive in a non-emergency situation. The sentence “routine operating instructions can be directives” therefore goes beyond the reach of the Standard.
<b>Response:</b> The SDT thanks you for your comments. The sentence “Routine operating instructions can be directives” has been removed in the current draft interpretation as several commenters indicated it added confusion.		
Midwest ISO Standards Collaborators	The interpretation does not expand the reach of the standard.	
Pacificorp	The interpretation does not expand the reach of the standard.	
Lakeland Electric	The interpretation does not expand the reach of the standard.	
LG&E and KU Energy LLC	The interpretation does not expand the reach of the standard.	
NV Energy	The interpretation	

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Organization	Yes or No	Question 2 Comment
	does not expand the reach of the standard.	
NIPSCO	The interpretation does not expand the reach of the standard.	I believe this clarifies a requirement.
<b>Response:</b> The SDT thanks you for your comments.		
Pepco	The interpretation does not expand the reach of the standard.	
Dynegy Inc.	The interpretation does not expand the reach of the standard.	
City of Austin dba Austin Energy	The interpretation does not expand the reach of the standard.	
US Army Corps of Engineers -	The	

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Organization	Yes or No	Question 2 Comment
Omaha District	interpretation does not expand the reach of the standard.	
FirstEnergy	The interpretation does not expand the reach of the standard.	
BGE		No comment.
American Transmission Company	The interpretation does not expand the reach of the standard.	
Exelon	The interpretation does not expand the reach of the standard.	
ISO New England Inc.	The interpretation expands the reach of the standard.	The draft interpretation appropriately clarifies that the requirement must fit within the context of the purpose statement. The original intent in the NERC Operating Policies, which was translated into Version 0, was that routine operating instructions do not require 3-part communication. The interpretation, however, implies that non-emergency communications may be audited as requiring 3-part communication, if the system operator issues a directive in a non-emergency situation. The sentence "routine operating instructions can be directives" therefore goes beyond the reach of the Standard.

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Organization	Yes or No	Question 2 Comment
<b>Response:</b> The SDT thanks you for your comments. The sentence "Routine operating instructions can be directives" has been removed in the current draft interpretation as several commenters indicated it added confusion.		
Duke Energy	The interpretation expands the reach of the standard.	We believe that this interpretation expands the reach of the standard by attempting to define what can be a directive and by stating that the standard does not apply to all directives.
<b>Response:</b> The SDT thanks you for your comments. The sentence "Routine operating instructions can be directives" has been removed in the current draft interpretation as several commenters indicated it added confusion. The SDT feels that with this deletion, the interpretation is within the reach of the standard.		
Electric Reliability Council of Texas, Inc.	The interpretation expands the reach of the standard.	ERCOT ISO believes the proposed Interpretation is an expansion of the requirement. The draft Interpretation appropriately clarifies that the requirement must fit within the context of the purpose statement. However, this is not what is drafted in the Interpretation. The Interpretation states that non-emergency communications such as routine operating instructions may be considered directives and, therefore, implies that they may be audited as directives. The draft Interpretation should align to the purpose statement of the Standard. The purpose of the Standard is to address real-time emergency conditions. Routine operating instructions are not intended to address real-time emergency conditions.
<b>Response:</b> The SDT thanks you for your comments. The sentence "Routine operating instructions can be directives" has been removed in the current draft interpretation as several commenters indicated it added confusion. The SDT feels that with this deletion, the interpretation is within the reach of the standard.		
United Illuminating Company	The interpretation does not expand the reach of the standard.	
Constellation Energy Commodities Gruop	The interpretation expands the reach of the standard.	The interpretation states that "routine operating instructions can be directives." The term "directives" is not in the NERC Glossary of Terms, nor is it locally defined in the standard. By stating what a directive might be, instead of what it definitely is, the interpretation expands the reach of the standard, without adding clarity.

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Organization	Yes or No	Question 2 Comment
<b>Response:</b> The SDT thanks you for your comments. The sentence "Routine operating instructions can be directives" has been removed in the current draft interpretation as several commenters indicated it added confusion. The SDT feels that with this deletion, the interpretation is within the reach of the standard.		
Constellation Power Generation	The interpretation expands the reach of the standard.	The interpretation states that "routine operating instructions can be directives." The term "directives" is not in the NERC Glossary of Terms, nor is it locally defined in the standard. By stating what a directive might be, instead of what it definitely is, the interpretation expands the reach of the standard, without adding clarity.
<b>Response:</b> The SDT thanks you for your comments. The sentence "Routine operating instructions can be directives" has been removed in the current draft interpretation as several commenters indicated it added confusion. The SDT feels that with this deletion, the interpretation is within the reach of the standard.		
Independent Electricity System Operator	The interpretation does not expand the reach of the standard.	The response to the request for interpretation narrows the reach of the standard.
<b>Response:</b> The SDT thanks you for your comments.		
American Electric Power	The interpretation does not expand the reach of the standard.	
National Grid	The interpretation does not expand the reach of the standard.	National Grid believes that the interpretation narrows the scope of the standard by clarifying that three-part communication is only related to real-time emergency conditions.

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Organization	Yes or No	Question 2 Comment
<b>Response:</b> The SDT thanks you for your comments.		
Entergy Services	The interpretation does not expand the reach of the standard.	
Alliant Energy	The interpretation does not expand the reach of the standard.	
Manitoba Hydro	The interpretation does not expand the reach of the standard.	Please see comments in Question 3.

**3. Do you agree with this interpretation? If not, why not.**

**Summary Consideration:**

There were 33 commenters of which there was 1 abstention, 17 in agreement, and 15 in disagreement.

There was a slight majority of agreement with the interpretation. The majority of the commenters disagreeing with the interpretation wanted to remove the sentence "Routine operating instructions can be directives" because they felt it added confusion. The SDT agreed, and removed the sentence. "

Several other important comments and the SDT response are summarized as follows:

Some commenters recommended replacing the clause "during a real-time emergency" with "to prevent or resolve a real-time emergency". The SDT instead modified "during a real-time emergency" to "to address a real-time emergency" to be consistent with the purpose statement.

One commenter suggested that NERC Standard COM-002-2 has two separate and distinct purpose statements. The SDT respectfully disagrees and believes that the purpose statement is not two separate and distinct purpose statements but one purpose statement.

There was a statement about confusion with the definition of Interoperability Communications. The Definition is only proposed and does not have standing therefore it cannot be considered for this interpretation.

Commenters felt that interpretation response regarding electronic communications does not add to the response and suggest that the last sentence of the interpretation should be removed. The SDT agreed, and removed the last sentence of the interpretation as it went beyond the question asked.

A commenter recommend that that this interpretation be put on hold and if needed, the resources used for this interpretation be redirected to assist the Project 2006-06 standard drafting team and allow the team to complete their revision work. The SDT is aware of the work being done by Project 2006-06; however, the SC has directed the interpretation move forward.

Organization	Yes or No	Question 3 Comment
SERC OC Standards Review	Yes	While we agree with the interpretation, we believe this standard needs to be revised to provide more clarity and certainty. Within the requirement (R2) there needs to be more clarity on how it supports the purpose of

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Organization	Yes or No	Question 3 Comment
Group		this standard, which in this specific case, addresses real-time emergency conditions only. Future versions of this standard would have more clarity by adding the word "verbal" in front of "directive" in requirement 2. The review team discussed the last sentence of the interpretation response regarding electronic communications as to whether or not it applied to this interpretation. We feel that it does not add to the response and suggest that the last sentence of the interpretation should be removed. "The comments expressed herein represent a consensus of the views of the above named members of the SERC OC Standards Review group only and should not be construed as the position of SERC Reliability Corporation, its board or its officers."
<b>Response:</b> The SDT thanks you for your comments. The sentence "Routine operating instructions can be directives" has been removed in the current draft interpretation as several commenters indicated it added confusion. The SDT also removed the last sentence of the interpretation as it went beyond the question. The SDT believes the current draft of the interpretation has addressed the concerns identified in the comments.		
Santee Cooper	Yes	
Electric Market Policy	Yes	
MRO's NERC Standards Review Subcommittee	No	The NSRS believes that the sentence "Routine operating instructions can be directives," should be struck. There is nothing in the standard that supports this statement. They included the statement because the question was asked. They should have answered the question that the standard does not address it. We also recommend changing "during a real-time emergency" to "to prevent or resolve a real-time emergency".
<b>Response:</b> The SDT thanks you for your comments. The sentence "Routine operating instructions can be directives" has been removed in the current draft interpretation as several commenters indicated it added confusion. The SDT notes your comments on real time emergencies but has elected instead to use "to address a real time emergency" to be consistent with the purpose statement of COM-002-2. The SDT believes the current draft of the interpretation has addressed the concerns identified in the comments.		
Bonneville Power Administration	Yes	
Kansas City Power & Light	Yes	
IRC Standards Review Committee	No	The SRC generally supports the Interpretation as it clarifies: (a) that the meaning of the Standard is driven by its Purpose (i.e., as applying to emergency situations), and (b) that the 3-part communication requirements do not apply to non-verbal communication. Because the interpretation correctly states that the Standard does not define directives, the sentence in the Interpretation that attempts to define directive as "routine operating instruction" should be struck to make the Interpretation more clear and concise, and not introduce new confusion. For example, some auditors may interpret the Interpretation as meaning that other Standards

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Organization	Yes or No	Question 3 Comment
		which state that an entity must follow directives from its TOP as meaning that such situations require 3-part communications as well. The SRC generally supports the interpretation, subject to the revisions that we propose. In parallel, we continue to support the other drafting teams' efforts to address these issues in a more comprehensive fashion.
<b>Response:</b> The SDT thanks you for your comments. The sentence "Routine operating instructions can be directives" has been removed in the current draft interpretation as several commenters indicated it added confusion.		
Midwest ISO Standards Collaborators	No	This interpretation has improved greatly over previous versions and we generally support it. However, we do believe a couple of refinements are necessary to finalize the interpretation. First, the sentence "Routine operating instructions can be directives" should be struck. Nothing in the standard supports this statement and it contradicts the first sentence of the interpretation which makes clear that COM-002-2 does not specify the conditions under which a directive is issued. We understand that statement was in response to the question asked in the request for interpretation. Given that the interpretation must be responsive to the question, we suggest that the response should simply state that the standard does not address routine operating instructions. We also recommend replacing the clause "during a real-time emergency" with "to prevent or resolve a real-time emergency" in the second sentence.
<b>Response:</b> The SDT thanks you for your comments. The sentence "Routine operating instructions can be directives" has been removed in the current draft interpretation as several commenters indicated it added confusion. The SDT notes your comments on real time emergencies but has elected instead to use "to address a real time emergency" to be consistent with the purpose statement of COM-002-2. The SDT believes the current draft of the interpretation has addressed the concerns identified in the comments.		
PacifiCorp	Yes	
Lakeland Electric	Yes	Lakeland Electric supports the drafting team's interpretation and agrees that "routine operating instructions during normal operations would not require the communications protocols for repeat backs as specified in R2".
<b>Response:</b> The SDT thanks you for your comments.		
LG&E and KU Energy LLC	No	The inclusion of the word "only" and the phrase "during a real-time emergency" in the second sentence in the Response creates ambiguity for operators. The sentence as written may contradict the third sentence "Routine operating instructions can be directives." Additional ambiguity is introduced in the second to last sentence "[a]s such, routine operating instructions during normal operations would not require the communications protocols for repeat backs as specified in R2." LG&E and KU suggest revising the Response

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Organization	Yes or No	Question 3 Comment
		<p>as follows:COM-002-2 R2 does not specify the conditions under which a directive is issued, nor does it define directive. COM-002-2 R2 provides the requirements to be followed when a directive is issued. Routine operating instructions can be directives if stated as such during the communication. COM-002-2 applies to all directives. The purpose statement for COM-002-2 is "To ensure Balancing Authorities, Transmission Operators, and Generator Operators have adequate communications and that these communications capabilities are staffed and available for addressing a real-time emergency condition. To ensure communications by operating personnel are effective." As such, routine operating instructions during normal operations may not require the communications protocols for repeat backs as specified in R2. This requirement addresses verbal communication, so electronic communication would not fall under COM-002-2 R2. Directives should be stated as such during the communication.</p>
<p><b>Response:</b> The SDT thanks you for your comments. The SDT removed the word "only" and modified the phrase "during a real-time emergency" to "to address a real-time emergency" to be consistent with the purpose statement of COM-002-2. The sentence "routine operating instructions can be directives" has been removed in the current draft interpretation as several commenters indicated it added confusion. The SDT also removed the last sentence of the interpretation as it went beyond the question. The SDT believes the current draft of the interpretation has addressed the concerns identified in the comments. The SDT believes the current draft of the interpretation has addressed the concerns identified in the comments.</p>		
NV Energy	Yes	<p>Yes, this interpretation properly applies the subject requirement to the scope of "real time emergency situations".</p>
<p><b>Response:</b> The SDT thanks you for your comments.</p>		
NIPSCO	No	<p>Yes and No, I agree with the intent and appreciate this effort however the wording is not clear and concise. Please consider something like this and thanks:COM-002-2 R2 provides the requirements to be followed when a directive is issued only during a real-time emergency. Some of these directives can be routine operating instructions. This is consistent with the purpose statement which says in part "To ensure Balancing Authorities, Transmission Operators, and Generator Operators have adequate communications and that these communications capabilities are staffed and available for addressing a real-time emergency condition." As such, routine operating instructions during normal operations would not require the communication protocols for repeat backs as specified in R2. COM-002-2 R2 addresses verbal communication, and therefore electronic dispatch instructions would not fall under this requirement</p>
<p><b>Response:</b> The SDT thanks you for your comments. The SDT removed the word "only" and modified the phrase "during a real-time emergency" to "to address a real-time emergency" to be consistent with the purpose statement of COM-002-2. The sentence "routine operating instructions can be directives" has been removed in the current draft interpretation as several commenters indicated it added confusion. The SDT also removed the last sentence of the interpretation as it went beyond the question. The SDT believes the current draft of the interpretation has addressed the concerns identified in the comments.</p>		

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Organization	Yes or No	Question 3 Comment
Pepco	Yes	The interpretation clarified that R2 verbal communication protocols apply to "directives" for emergency situations, not to normal/non-emergency situations. The interpretation also stated that R2 does not address the issuing of electronic directives during emergency conditions. That interpretation leaves this issue without resolution.
<b>Response:</b> The SDT thanks you for your comments. The SDT removed the last sentence of the interpretation as it went beyond the question. This interpretation attempts to clarify whether routine operating instructions are "directives" or whether "directives" are limited to actual and anticipated emergency operating conditions, not to define the term directive or to clarify the issuing of electronic directives.		
Dynegy Inc.	Yes	Directives need to be clarified.
<b>Response:</b> The SDT thanks you for your comments. The SDT removed the last sentence of the interpretation as it went beyond the question. This interpretation attempts to clarify whether routine operating instructions are "directives" or whether "directives" are limited to actual and anticipated emergency operating conditions, not to define the term directive or to clarify the issuing of electronic directives.		
City of Austin dba Austin Energy	Yes	
US Army Corps of Engineers - Omaha District	Yes	
FirstEnergy	Yes	
BGE	No	BGE believes the interpretation does not adequately define when 3-part communications is required by COM-002-2. The interpretation states, "It only provides the requirements to be followed when a directive is issued during a real-time emergency." Does this refer only to operational instructions issued during a real-time emergency or does COM-002-2 also cover any communications by operating personnel that take place during an emergency? BGE also believes that until "Directive" is defined that there will continuity to be ambiguity regarding when 3-part communications is required.
<b>Response:</b> The SDT thanks you for your comments. This interpretation attempts to clarify whether routine operating instructions are "directives" or whether "directives" are limited to actual and anticipated emergency operating conditions, not to define the term directive. The SDT notes your comments on real time emergencies but has elected instead to use "to address a real time emergency" to be consistent with the purpose statement of COM-002-2. The SDT believes the current draft of the interpretation has addressed the concerns identified in the comments.		

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Organization	Yes or No	Question 3 Comment
American Transmission Company	Yes	
Exelon	Yes	
ISO New England Inc.		<p>ISO-NE generally supports the Interpretation as it clarifies: (a) that the meaning of the Standard is driven by its Purpose (i.e., as applying to emergency situations), and (b) that the 3-part communication requirements do not apply to non-verbal communication. Because the interpretation correctly states that the Standard does not define directives, the sentence in the Interpretation that attempts to define directive as "routine operating instruction" should be struck to make the Interpretation more clear and concise, and not introduce new confusion and/or a new definition outside the Reliability Standards Development Process. For example, some auditors may interpret the Interpretation as meaning that other Standards which state that an entity must follow directives from its TOP as meaning that such situations require 3-part communications as well. We generally supports the Interpretation, subject to the revisions that we propose. In parallel, we continue to support the other drafting teams' efforts to address these issues in a more comprehensive fashion.</p>
<p><b>Response:</b> The SDT thanks you for your comments. The sentence "routine operating instructions can be directives" has been removed in the current draft interpretation as several commenters indicated it added confusion. The SDT also removed the last sentence of the interpretation as it went beyond the question. The SDT believes the current draft of the interpretation has addressed the concerns identified in the comments.</p>		
Duke Energy	No	<p>While we applaud the drafting team's attempt to respond to the request for clarification, we believe the current interpretation is unintentionally confusing and could be construed as expanding the reach of the standard. The proposed alternative language, based on the drafting team response, is offered to address these concerns: "COM-002-2 R2 does not define directive nor does it specify the conditions under which a directive is issued. It only provides the requirements to be followed when a directive is issued. The purpose statement for COM-002-2 is "To ensure Balancing Authorities, Transmission Operators, and Generator Operators have adequate communications and that these communications capabilities are staffed and available for addressing a real-time emergency condition. To ensure communications by operating personnel are effective." As such, routine operating instructions during normal operations would not require the communications protocols for repeat backs as specified in R2. This requirement addresses verbal communication, so electronic communication would not fall under COM-002-2 R2."</p>
<p><b>Response:</b> The SDT thanks you for your comments. The sentence "routine operating instructions can be directives" has been removed in the current draft interpretation as several commenters indicated it added confusion. The SDT also removed the last sentence of the interpretation as it went beyond the question. The SDT believes the current draft of the interpretation has addressed the concerns identified in the comments.</p>		

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Organization	Yes or No	Question 3 Comment
Electric Reliability Council of Texas, Inc.	No	The draft interpretation not only fails to add clarity, but introduces further confusion. ERCOT ISO offers the following suggestion for alternative language. The purpose statement for COM-002-2 is "To ensure Balancing Authorities, Transmission Operators, and Generator Operators have adequate communications and that these communications capabilities are staffed and available for addressing a real-time emergency condition. To ensure communications by operating personnel are effective." As such, COM-002-2 should only be interpreted to address the requirements to be followed for directives addressing a real-time emergency condition. It is understood that an entity may issue directives as part of routine operating instructions during normal operations. As such, routine operating instructions during normal operations do not require the communications protocols for repeat backs as specified in R2. This requirement addresses verbal communication, so electronic communication would not fall under COM-002-2 R2.
<b>Response:</b> The SDT thanks you for your comments. The sentence "Routine operating instructions can be directives" has been removed in the current draft interpretation as several commenters indicated it added confusion. The SDT notes your comments on real time emergencies but has elected instead to use "to address a real time emergency" to be consistent with the purpose statement of COM-002-2. The SDT also removed the last sentence of the interpretation as it went beyond the question. The SDT believes the current draft of the interpretation has addressed the concerns identified in the comments.		
United Illuminating Company	Yes	
Constellation Energy Commodities Group	No	In February 2010, the Project 2006-06 team submitted a draft version of COM-002 to industry. In this draft, the drafting team added more clarity to the standard by clearly defining what a directive is, as well as clearly defining the roles of the applicable functional models when giving or receiving directives. In light of the work already completed by that drafting team, we recommend that this interpretation be put on hold and if needed, the resources used for this interpretation be redirected to assist the Project 2006-06 standard drafting team and allow the team to complete their revision work, thus resolving the interpretive question.
<b>Response:</b> The SDT thanks you for your comments. The SDT is aware of the work being done by Project 2006-06; however any work being done will be towards a new version of the COM 002 standard. This interpretation is specifically for COM-002-2 and to address the clarification needed as indicated in the request for interpretation.		
Constellation Power Generation	No	In February 2010, the Project 2006-06 team submitted a draft version of COM-002 to industry. In this draft, the drafting team added more clarity to the standard by clearly defining what a directive is, as well as clearly defining the roles of the applicable functional models when giving or receiving directives. In light of the work already completed by that drafting team, Constellation Power Generation recommends that that this interpretation be put on hold and if needed, the resources used for this interpretation be redirected to assist the Project 2006-06 standard drafting team and allow the team to complete their revision work, thus resolving the interpretive question. On a separate note, the deadline for these comments, 12/18/10, falls on a Saturday.

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Organization	Yes or No	Question 3 Comment
		To the extent possible, we request that deadlines avoid weekends and federal holidays to all for full participation in the stakeholder process.
		<b>Response:</b> The SDT thanks you for your comments. The SDT is aware of the work being done by Project 2006-06; however any work being done will be towards a new version of the COM 002 standard. This interpretation is specifically for COM-002-2 and to address the clarification needed as indicated in the request for interpretation. The SDT will attempt to consider deadlines that will avoid weekends and federal holidays for future activities.
Independent Electricity System Operator	No	We believe that NERC Standard COM-002-2 has two separate and distinct purpose statements; the first is to ensure that entities have adequate communication facilities that are staffed and available for addressing real-time emergency conditions; the second is to ensure that communications by operating personnel are effective. The standard does not say that effective communications are required only during emergency conditions. Therefore we do not agree that the standard “.... only provides the requirements to be followed when a directive is issued during a real-time emergency.”
		<b>Response:</b> The SDT thanks you for your comments. The SDT respectfully disagrees and believes that the purpose statement is not two separate and distinct purpose statements but one purpose statement.
American Electric Power	Yes	
National Grid	No	The interpretation is in line with National Grid's interpretation of COM-002 R.2. COM-002 R.2 only applies to directives used for real-time emergencies and not to directives used during normal operations. Also, National Grid believes that this interpretation should be consistent across all standards that use the term “directive” that is, COM-002 R.2's requirement for three-part communication applies only during real-time emergency situations.
		<b>Response:</b> The SDT thanks you for your comments. This interpretation attempts to clarify whether routine operating instructions are “directives” or whether “directives” are limited to actual and anticipated emergency operating conditions, not to define the term directive.
Entergy Services	No	We suggest the drafting team define “real-time emergency conditions” as that term will be applied for compliance with this standard and Interpretation. There are two issues here: 1) what are the operational conditions of the system that would define “real-time emergency conditions, and 2) what verbal terminology is acceptable so that others will immediately understand a “directive” is being given under “real-time emergency conditions” and the “directive” is not a “routine operating instructions during normal operations” directive. Is each BA, TOP, and GOP free to define its own protocols for identification of “real-time emergency conditions” which would then invoke the requirement to comply with this standard?

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Organization	Yes or No	Question 3 Comment
<p><b>Response:</b> The SDT thanks you for your comments. This interpretation attempts to clarify "whether routine operating instructions are "directives" or whether "directives" are limited to actual and anticipated emergency operating conditions, not to address the two issues mentioned in the comments. To define "real-time emergency conditions" and answer the questions within the comments would be outside of the scope of this request for interpretation.</p>		
Alliant Energy	No	Strike the sentence "Routine operating instructions can be directives". Nothing in the standard supports this statement and it contradicts the first sentence of the interpretation which makes clear that COM-002-2 does not specify the conditions under which a directive is issued. In the second sentence replace the clause "during a real-time emergency" with "to prevent or resolve a real-time emergency".
<p><b>Response:</b> The SDT thanks you for your comments. The sentence "Routine operating instructions can be directives" has been removed in the current draft interpretation as several commenters indicated it added confusion. The SDT also modified "during a real-time emergency" to "to address a real-time emergency" to be consistent with the purpose statement. The SDT believes the current draft of the interpretation has addressed the concerns identified in the comments.</p>		
Manitoba Hydro	No	-The main problem is that the definition of 'directive' has not been clearly established by NERC and this is leading to confusion in the COM-002 standard. A SAR should be initiated to develop a definition for 'directive' in order to reduce the lac
<p><b>Response:</b> The SDT thanks you for your comments. The SDT agrees that a SAR should be issued to address issues outside of this Interpretation. The SDT also points out that there are Standards under development that intend to address your concerns.</p>		

END OF REPORT