

From: Guy V. Zito <gzito@npcc.org>
Sent: Friday, November 01, 2013 9:30 AM
Subject: NPCC RSC Determinations-NERC Ballot: Project 2007-02 - Operating Personnel Communications Protocols - COM-002-4

NPCC Members of the NERC Registered Ballot Body,

The NPCC Regional Standards Committee (RSC) has reviewed and conducted extensive discussions on the subject project currently posted for comment and an Initial Ballot through **8pm, November 4, 2013**. The RSC has NOT reached a consensus ballot recommendation for the Region. The high level issues precluding the support of this standard by some of the RSC membership, are as follows:

- Continuation of a “zero tolerance” approach for non-adherence to communication protocols involving Reliability Directives. Zero tolerance approaches already exist in the actual implementation of those Reliability Directives in other standards such as TOP and IRO. Implementing yet another zero tolerance to simply the communication portion of those Directives in conjunction with VSLs of “Severe” is not satisfactory to many.
- Waiver of the standards development process was viewed as unnecessary and an appeasement to the NERC Board of Trustees (BOT) rather than filling any demonstrable gap in reliability or addressing a FERC Directive containing an associated date for resolution from the Commission.
- Actions taken since the release of the 2003 Blackout Report, specifically “Recommendation 26”, satisfactorily addressed gaps.
- The NERC Operating Committee (OC) developed communication guidelines that some members believe is sufficient to address normal communications, also the OC suggested that a new drafting team be formed and begin development, not utilize the same team.
- The existing COM-002 standard interpretation for emergency communications approved by the industry with a very high percentage of over 90% and then approved by the BOD over a year ago, is yet to be filed with the Commission has created consternation with the NPCC RSC members.

NPCC as the Regional Entity supports the concept of combining the COM-2 and COM-3 standards into a single communication standard and further support requirements to ensure entities have an adequate communications protocol document in place and are maintaining, training to, and evaluating the effectiveness of these protocols on an ongoing basis. NPCC however does not support a “zero tolerance” approach to measuring compliance with how an entity follows their protocols (e.g. individual occurrences when someone failed to follow the protocol due to error). In addition, NPCC is supportive of following the OC guidance by implementing the recent NERC Standards Committee action of supplementing the existing drafting team with new members to bring new perspectives and supports the use of the full

standards development process to develop a quality standard that addresses the need of the NERC Board as well as the industry concerns of a zero tolerance standard, and which will promote and ensure continued reliable operation of the BPS. In consideration of the member's concerns, NPCC will **abstain** in this ballot and submit helpful comments to improve the standard. In addition, NPCC in conjunction with five other Regions has provided input to the NERC BOT Standards and Oversight Technical Committee and offered to conduct a pilot RAI on this standard in an effort to address the zero tolerance issue from a compliance/audit perspective, should this standard pass.

Please contact me if you have further questions.

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FYI- The following is a more comprehensive listing of the highlights of the issues raised by the RSC that will be included in regarding the Comment Form for Project 2007-02 - Operating Personnel Communications Protocols - COM-002-4 being submitted to NERC and will be posted on the NPCC Website;

- Neither Recommendation 26 in the Final Report on the August 14, 2003 Blackout In The United States and Canada, or FERC Order 693 require 3-part communications protocol, or any established communication protocol for day to day operations.
- The Report to the U.S.-Canada Power System Outage Task Force The August 14, 2003 Blackout One Year Later: Actions Taken in the United States and Canada To Reduce Blackout Risk from the Natural Resources Canada, and the U.S. Department of Energy, the section Key Accomplishments—and Major Challenges Still Ahead does not mention communications issues.
- The Requirements of COM-002-4 as written make it a zero tolerance standard.
- Not following a communications protocol when the Operating Instruction is identified as a Reliability Directive is an instance of zero tolerance. The VSLs in the standard are extreme, and the way they are worded needs to be reviewed.
- The zero defect assessment for Reliability Directives is contrary to the tenets of results based standard development, and the intention of the RAI process.
- There are realistic emergency operating situations where having to identify an Operating Instruction as a Reliability Directive and then having to repeat it back will take time that may mean the difference between having to shed load or not shed load. Although identification of a Reliability Directive appears in the new TOP standard filed with the Commission, adding a zero tolerance to the communications aspect of the RD will not be an enhancement to reliability but could be a detriment.
- In NERC Management's response in the document "NERC Management Response to the Questions of the NERC BOT on Reliability Standard COM-003-1" (page 4/5), it was suggested that distinguishing between "operating instructions" and "reliability directives"

would not be practical during real-time situations and that it was as important, if not more important that common protocols be used for emergency communications.

- Burst messaging is not dealt with appropriately in the standard.
- FERC approved TOP-001-1a Requirement R3 deals with reliability directives, and introduces a double jeopardy situation with COM-002-4. TOP-001-1a Requirement R4, IRO-001-1.1 Requirement R8, and IRO-004-2 Requirement R1 also address communications.
- The definition of Operating Instruction includes Reliability Directive. Because Reliability Directive is a communication that requires immediate or emergency action, it should not be included in the Operating Instruction definition.
- Requirement R5 addressing a “method to evaluate the communications protocols...” applies to the BA, RC, and TO. Why not the DP or GOP?
- There is a disparity between the RSAW and VSLs as to what is considered non-compliant.
- The standard should not apply to DPs that do not own or operate BES equipment.
- One year for the implementation plan is too short.
- Regarding the RSAW, the “Note to Auditor” for R3 and R4 is outside of the scope of the standard.