Unofficial Comment Form
Project 2015-07 Internal Communications Capabilities
COM-001-3

DO NOT use this form for submitting comments. Use the electronic form to submit comments on the proposed COM-001-3 – Communications standard. The electronic comment form must be completed and submitted by 8:00 p.m. Eastern, May 6, 2016.

If you have questions, contact Darrel Richardson (via email) or at (609) 613-1848 or Laura Anderson (via email) or at (404) 446-9671.

The project page can be accessed by clicking here.

Background Information
This posting is soliciting formal comment.

The project addresses the directive from FERC Order No. 808 to modify the COM-001-2 standard or develop a new standard to address “internal communications capabilities that could involve the issuance or receipt of Operating Instructions or other communications that could have an impact on reliability.” Order No. 808, at P 1.

In Order No. 808, FERC directed “NERC to develop modifications to COM-001-2, or to develop a new standard, to address our concerns regarding ensuring the adequacy of internal communications capability whenever internal communications could directly affect the reliable operation of the Bulk-Power System.” Order No. 808, at P 41. In the same paragraph, FERC clarified that this intended to include a directive that the modified or new standard would “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.” Id.

The SDT reviewed the FERC directives and developed proposed Requirements R12 and R13 for a proposed COM-001-3. The proposed Requirements address internal Interpersonal Communication capabilities as directed by FERC for Reliability Coordinators, Balancing Authorities, and Transmission Operators in Requirement R12 and for Distribution Providers and Generator Operators in Requirement R13. Two separate Requirements were developed to maintain VRF consistency with the existing Requirements from COM-001-2.

The SDT carefully reviewed and considered the comments received during the initial posting period and, based on stakeholder comments, made revisions to the initial recommendations.
Questions

The scope of this project includes:

- Internal telecommunications or other internal communication systems “between geographically separate control centers within the same functional entity.” Order No. 808, at P 41.
- Internal telecommunications or other internal communication systems “between a control center and field personnel.” Id.
- “[T]he adequacy of internal communications capability whenever internal communications could directly affect the reliable operation of the Bulk-Power System.” Id.
- “[I]nternal communications capabilities that could involve the issuance or receipt of Operating Instructions or other communications that could have an impact on reliability.” Order No. 808, at P 1.

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

☐ Yes
☒ No

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

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

Similarly, suggest revising Requirement R13 to read:

Each Distribution Provider shall have internal Interpersonal Communication capabilities for the exchange of information that is necessary for the Reliable Operation of the BES. This includes communication capabilities between Control Centers within the same functional entity, and between Control Centers and all personnel whose responsibilities can impact the Real-time operation of the BES.
2. If you have any other comments on the proposed COM-001-3 that you haven’t already mentioned above, please provide them here:

Comments: