Unofficial Comment Form
Reliability Coordination (Project 2006-06)

Please DO NOT use this form to submit comments. Please use the electronic comment form to submit comments on the first formal posting for Project 2006-06—Reliability Coordination. The electronic comment form must be completed by February 8, 2011.

2006-06 Project Page

If you have questions please contact Stephen Crutchfield at stephen.crutchfield@nerc.net or by telephone at 609-651-9455.

Background

The RCSDT has revised the COM-001-2, COM-002-3 and IRO-001-1 standards based on stakeholder comments received during the initial ballot and formal comment period and quality reviews of each standard.

The RCSDT has addressed comments on the applicability of all three standards and implementation plans by aligning COM-001-2, COM-002-3, and IRO-001-1 to apply to the same entities and by removing LSE, PSE and TSP as applicable entities from the COM standards. Additionally, the Interchange Coordinator has been removed as an applicable entity from the standards and implementation plans.

Several commenters had suggestions for improvements to the requirement language and applicability of COM-001-2. The RCSDT believes the standard correctly and adequately requires each applicable entity that would have capability to receive Interconnection and operating information to have Interpersonal Communications, and Alternative Interpersonal Communications to be used when the Interpersonal Communication is not available. The RCSDT made the following changes to COM-001-2 based on stakeholder suggestions:

1. The following Requirement parts were added to COM-001-2:
   - 3.5 Adjacent Transmission Operators synchronously connected within the same Interconnection
   - 4.3 Adjacent Transmission Operators synchronously connected within the same Interconnection
   - 5.5 Adjacent Balancing Authorities
   - 6.3 Adjacent Balancing Authorities

2. The phrase "to exchange Interconnection and operating information" was removed from requirements R1 through R8 to clarify that the intent of this capability is NOT for the exchange of data.

3. A new requirement was added for clarity regarding what is required of Distribution Providers and Generator Operators (i.e., collaboration between entities to restore a failed communications capability):

   R11. Each Distribution Provider and Generator Operator that experiences a failure of any of its Interpersonal Communication capabilities shall consult with their Transmission Operator or Balancing Authority as applicable to determine a mutually agreeable time to
restore the Interpersonal Communication capability. [Violation Risk Factor: Medium][Time Horizon: Real-time Operations]

The proposed definition of Reliability Directive shown in COM-002-3 was revised to include Adverse Reliability Impact as shown to more fully address emergencies or events that might lead to instability or Cascading:

**Reliability Directive:** A communication initiated by a Reliability Coordinator, Transmission Operator or Balancing Authority where action by the recipient is necessary to address an Emergency or Adverse Reliability Impact.

As a reference, we have included the existing definition of Emergency and the BOT approved definition of Adverse Reliability Impact:

**Emergency:** Any abnormal system condition that requires automatic or immediate manual action to prevent or limit the failure of transmission facilities or generation supply that could adversely affect the reliability of the Bulk Electric System.

**Adverse Reliability Impact:** The impact of an event that results in Bulk Electric System instability or Cascading.

Based on stakeholder feedback regarding IRO-001, the RCSDT removed Requirement R1. Other requirements were removed from IRO-001 and placed in more appropriate standards. These requirements did not fit with the purpose statement of IRO-001. Requirements R5 and R6 were removed from IRO-001 and placed in IRO-005-4. Requirements R7 and R8 were removed from IRO-001 and placed in IRO-002-2. These requirements were balloted and approved by stakeholders in July of 2011 and subsequently approved by the NERC BOT on August 4, 2011.

In addition, minor clarifications were made to the language of requirements and measures in COM-002-3 and IRO-001-3 based on suggestions from quality reviews of those standards.

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1 This definition was approved by the NERC Board of Trustees on August 4, 2011. Filing with regulatory authorities is pending.
You do not have to answer all questions. Enter all comments in Simple Text Format.

1. The RCSDT has revised the applicability of the standards and implementation plans by aligning COM-001-2, COM-002-3, and IRO-001-2 to apply to the same entities and by removing LSE, PSE and TSP as applicable entities from the COM standards. Additionally, the Interchange Coordinator has been removed as an applicable entity from the standards. Do you agree with this change in applicability to the three standards? If not, please explain in the comment area below.
   □ Yes
   □ No
   Comments:

2. Do you agree with the addition of “Adjacent” entities in COM-001-2, Parts 3.5, 4.3, 5.5 and 6.3 of COM-001-2? If not, please explain in the comment area below.
   □ Yes
   □ No
   Comments: NERC uses the terms “adjacent” and “neighboring” in various standards. It is generally believed that those terms have the same meanings, but there are those who believe those terms, as used, are intended to have different meanings. To ensure a consistent usage and understanding, the definition of the term adjacent must be made known before its addition to the standard. Consideration should be given to using only one term in all standards if adjacent and neighboring are intended to mean the same thing. Both terms are used in NERC Standards, sometimes both in the same standard. For example, EOP-001-2b uses “neighboring” in R5, and “adjacent” in R3.3.

3. The RCSDT removed the phrase "to exchange Interconnection and operating information" in COM-001-2, Requirements R1 through R8 based on stakeholder comments. Do you agree with the revision? If not, please explain in the comment area below.
   □ Yes
   □ No
   Comments:

4. A new requirement was added for clarity regarding what is required of Distribution Providers and the Generator Operators:
   R11. Each Distribution Provider and Generator Operator that experiences a failure of any of its Interpersonal Communication capabilities shall consult with their Transmission Operator or Balancing Authority as applicable to determine a mutually agreeable time to restore the
Interpersonal Communication capability. [Violation Risk Factor: Medium][Time Horizon: Real-time Operations]

This requirement requires collaboration between entities to restore a failed communications capability. Do you agree with the new requirement? If not, please explain in the comment area below

☐ Yes
☐ No

Comments:

5. The proposed definition of Reliability Directive shown in COM-002-3 was revised to include Adverse Reliability Impact as shown to more fully address emergencies or events that might lead to instability or Cascading:

   Reliability Directive: A communication initiated by a Reliability Coordinator, Transmission Operator or Balancing Authority where action by the recipient is necessary to address an Emergency or Adverse Reliability Impact.

   Do you agree with the proposed definition? If not, please explain in the comment area below

☐ Yes
☐ No

Comments:

6. Do you have any other comment, not expressed in questions above, for the RC SDT?

Comments: For COM-001:

1. R1.2 and R2.2: The phrase “within the same Interconnection” is improper; it needs to be removed. RCs between two Interconnections still need to communicate with each other for reliability coordination (e.g. between Quebec and the other RCs in the NPCC region to coordinate reliability issues including curtailing interchange transactions crossing an Interconnection boundary). The SDT’s response to industry comments on the previous posting that the phrase was added to address the ERCOT situation (that ERCOT does not need to communicate with other RCs and that such coordination takes place between TOPs) leaves a reliability gap.

2. R3.5 and R4.3: The phrase “synchronously connected within the same Interconnection” is also improper; it needs to be removed. TOPs do communicate with other TOPs including those asynchronously connected and in another Interconnection (e.g. between Quebec and all of its asynchronously interconnected neighbors). The reason that was used in response to the above comments (coordination among TOPs for DC tie operation) contradicts with the inclusion of this phrase in R3.5 and R4.3.

3. R4 and R6: Not requiring an Alternative Interpersonal Communication capability between the BAs and the DP and GOP can result in a reliability gap. If Interpersonal Communication capability between
the BAs and these entities is required to begin with to enable BAs to communicate with these entities (such as operating instructions or Reliability Directives) to ensure reliable operations, then an alternative capability is also needed to ensure this objective is achieved when the primary capability fails.

4. To preclude the possibility of problems arising from having different languages spoken between entities, COM-001-1.1 R4 should remain as it was or those ideas kept in the revised requirement. R4 read:

“R4. Unless agreed to otherwise, each Reliability Coordinator, Transmission Operator, and Balancing Authority shall use English as the language for all communications between and among operating personnel responsible for the real-time generation control and operation of the interconnected Bulk Electric System. Transmission Operators and Balancing Authorities may use an alternate language for internal operations.”

5. Measure M3 does not cover the added R3.5 condition (having Interpersonal Communications capability with each adjacent TOP). M3 needs to be revised.

For IRO-001:

The Data Retention Section does not reflect the revised requirements. As examples: the Electric Reliability Organization is no longer a responsible entity; the Reliability Coordinator should replace the ERO for keeping data for R1. Transmission Operator, Balancing Authority, Generator Operator and Distribution Provider should replace the Reliability Coordinator for keeping data for R2. And, in the Data Retention Section, R4 and M4 are mentioned. However, there are only three requirements with their corresponding measures in the standard.