Unofficial Comment Form
Project 2007-02 Operating Personnel Communications Protocols
COM-002-4

Please DO NOT use this form. Please use the electronic comment form to submit comments on the proposed draft COM-002-4 (Operating Personnel Communications Protocols) standard. Comments must be submitted by January 31, 2013. If you have questions please contact Stephen Eldridge by email or by telephone at 404-446-9686.


Background Information:
Effective communication is critical for Bulk Electric System (BES) operations. Failure to successfully communicate clearly can create misunderstandings resulting in improper operations increasing the potential for failure of the BES. The eighth posting of Project 2007-02 is a continuation of the previous draft which combined COM-002-3 and COM-003-1 into one standard titled COM-002-4 that addresses communications protocols for operating personnel in Emergency, alert, and non-emergency situations.

The Standard Authorization Request (SAR) for this project was initiated on March 1, 2007 and approved by the Standards Committee on June 8, 2007. It established the scope of work for Project 2007-02 Operating Personnel Communications Protocols (OPCP). The scope described in the SAR is to establish essential elements of communications protocols and communications paths such that operators and users of the North American BES will efficiently convey information and ensure mutual understanding. The August 2003 Blackout Report, Recommendation Number 26, calls for a tightening of communications protocols. Federal Energy Regulatory Commission (FERC) Order 693 paragraph 532 reiterates this need. This proposed standard’s goal is to ensure that effective communication is practiced and delivered in clear and consistent language.

The standard will be applicable to Transmission Operators, Balancing Authorities, Reliability Coordinators, Generator Operators, and Distribution Providers. These requirements ensure that communications include essential elements such that information is efficiently conveyed and mutually understood for communicating Operating Instructions.

The Purpose statement of COM-002-4 states: “To improve communications for the issuance of Operating Instructions with predefined communications protocols to reduce the possibility of miscommunication that could lead to action or inaction harmful to the reliability of the Bulk Electric System (BES).”
1) **New NERC Glossary term:** The OPCP Standards Drafting Team (SDT) revised the definition of Operating Instruction from its previous drafts. The current definition reads “A command by operating personnel responsible for the Real-time operation of the interconnected Bulk Electric System to change or preserve the state, status, output, or input of an Element of the Bulk Electric System or Facility of the Bulk Electric System. (A discussion of general information and of potential options or alternatives to resolve Bulk Electric System operating concerns is not a command and is not considered an Operating Instruction.)” The Project 2007-02 SDT removed the term “Reliability Directive” in order to avoid complications that may result from the Notice of Proposed Rulemaking issued by the Federal Energy Regulatory Commission on November 21, 2013 proposing to remand the definition of “Reliability Directive.” COM-002-4 uses the defined term “Operating Instruction” to define the circumstances when documented communications protocols must be used. This term is proposed for addition to the North American Electric Reliability Corporation (NERC) Glossary to establish meaning and usage within the electricity industry.

2) **Project 2007-02, Posting 8 continues to combine COM-002-3 and COM-003-1 into COM-002-4.** The OPCP SDT combined COM-002-3 and COM-003-1 in posting 7 into one standard in order to simplify communications protocols for operating personnel. This construct has been maintained in the posting 8 draft. The OPCP SDT determined that one communications protocols standard that addresses Emergency, alert, and non-emergency situations will improve communications because system operators will not need to refer to a different set of protocols during an emergency situation. The OPCP SDT believes this will improve consistency of communications and mitigate confusion during stressful emergency situations. The OPCP SDT decided to combine the standards under the title COM-002-4 to further reduce confusion. The COM-002-4 title keeps the numbering of COM standards consecutive (e.g., COM-001, COM-002).

3) **Project 2007-02, Posting 8 features 7 requirements.** The OPCP SDT developed the requirement structure and language in posting 8 to incorporate Emergency, alert, and non-emergency communications protocols. The language in COM-002-4, Requirement R1 permits applicable entities flexibility to develop their communication protocols but requires a set of minimum elements in the communications protocols. Requirement R1 requires communications protocols to include the following elements:

   a. **English Language:** Requirement R1, Part 1.1 – Require the issuer and receiver of an oral or written Operating Instruction to use the English language, unless agreed to otherwise. An alternate language may be used for internal operations.

   b. **Three-part Communication for Oral Operating Instructions:** Requirement R1, Parts 1.2 and 1.3 – Require three-part communication for issuers and receivers of oral two-party, person-to-person Operating Instructions.
c. **One-way Burst Message Receipt Confirmation and Clarification:** Requirement R1, Part 1.4– Requires the issuer of a written or oral single-party to multiple-party burst Operating Instruction to verbally or electronically confirm receipt by at least one receiver of the Operating Instruction. **Time Identification:** Requirement R1, Part 1.5 – Specify the instances that require time identification when issuing an oral or written Operating Instruction and the format for that time identification.

d. Transmission Interface Elements and Facilities Nomenclature: Requirement R1, Part 1.6 – Specify the nomenclature for Transmission interface Elements and Transmission interface Facilities when issuing an oral or written Operating Instruction.

Requirements R2 and R3 require each Balancing Authority, Reliability Coordinator, Transmission Operator, Distribution Provider and Generator Operator to conduct initial training for operating personnel who can issue and/or receive Operating Instructions. These requirements mandate that before operating personnel can issue or receive an Operating Instruction, the operating personnel in question must receive the training listed in the respective requirement.

Requirement R4 mandates a feedback loop for each Balancing Authority, Reliability Coordinator, and Transmission Operator, where the entity must assess the adherence of its operating personnel to the communication protocols the entity developed (with appropriate corrective actions) as well as assess the effectiveness of its documented communication protocols for its operating personnel that issue Operating Instructions.

Requirements R5 and R6 require the use of three part communication during Emergency conditions without exception, per the November 13, 2013 NERC Board of Trustees resolution.

Requirement R7 requires each Balancing Authority, Reliability Coordinator, and Transmission Operator that issues a written or oral single-party to multiple-party burst Operating Instruction to confirm the receipt of that Operating Instruction by at least one receiver.
The OPCP SDT is posting the standard for industry comment for a **30-day** comment period. The OPCP SDT received a waiver of the 45-day comment period required in the NERC Standards Process Manual from the NERC Standards Committee on December 11, 2013. Accordingly, we request that you include your comments on the electronic form by **January 31, 2014**.

**Questions**

1. **Do you agree that COM-002-4 addresses the NERC Board of Trustees November 19th, 2013 Resolution?** If not, please explain in the comment area?
   - Yes
   - Yes

   *Comments:* The proposed Requirements and Measures do not clearly delineate the differences in the actions required to be taken by the issuer and recipient depending upon whether or not the Operating Instruction is being given to alleviate or avoid an Emergency.

2. **Do you agree that COM-002-4 addresses the August 2003 Blackout Report Recommendation number 26, and FERC Order 693?** If not, please explain in the comment area.
   - Yes
   - Yes

   *Comments:* We do not agree that the blackout recommendation calls for the use of 3 part communication for every Operating Instruction and note that neither the NERC Board nor the SDT has provided any evidence that indicates a direct correlation between errors due to communication problems and events that adversely impact the BES. The justification for reliability standard Requirements that require 3 part communication for every Operating Instruction, and having to enforce compliance with the same, is not supported.
3. **Do you agree with the VRFs and VSLs for the Requirements? If not, please explain.**

☑ No

Comments: Regarding Requirement R4, the LOW VSL suggests that an entity is assigned a LOW VSL if assessments are conducted more than 12 months apart. There is no maximum or “cap” to the delayed assessment, and hence an entity may be 18, 19 or more months late in conducting the next assessment. In other standards this could well be assessed a MEDIUM or HIGH or even a SEVERE violation, depending on the time period that an entity failed the 12 month update requirement. Absent this “cap”, or staggered caps, the proposed HIGH and SEVERE VSLs can only be assessed based on whether or not there was ever an assessment, even if the last assessment was done 3 or 4 years prior to an audit. This is inconsistent with the general guideline for VSLs.

Regarding Requirement R5, the MEDIUM VSL and SEVERE VSL are identical, except the latter has a condition that is associated with the impact of the violation. This is inconsistent with the intent of the VSL, which is to assess the “extent to which” the requirement was violated, not the impact of the violation which should be captured by the VRF. This is also inconsistent with the VSL principle and guideline. Suggest removing the MEDIUM VSL, and the condition under the proposed SEVERE VSL be: “AND instability, uncontrolled separation, or cascading failures occurred as a result.” The same comments apply for Requirements R6 and R7.

We believe that the VRFs/VSLs should be modified to better reflect the stated intent of the NERC Board of Trustees November 19, 2013 Resolution, which is to enforce ‘zero tolerance’ only for failure to use 3 part communications by the issuer or recipient of an Operating Instruction when it is issued to alleviate or avoid an Emergency.

4. **Do you have any additional comments? Please provide them here.**

☑ Yes

Comments: Regarding Part 1.4, it must be considered that some ISOs issue multiple-party burst Operating Instruction to Generator Operators through electronic means.

Regarding Part 1.6, the requirement is vague and needs to be clarified for Registered Entities to know how to comply. How would one “specify the nomenclature” system wide?
Regarding Requirements R2 and R3, those “training” requirements aren’t necessary. Responsible Entities must adhere to the Requirements of NERC Standards and how they accomplish this should not be dictated by a standard’s requirement. Under RAI principles, NERC and Regions can determine what type of monitoring is appropriate for Responsible Entities’ compliance with the new COM Standard based on the quality of their Training programs. This would further support reliability by changing the requirement from a one-time audit (i.e., initial training) to an ongoing assessment.

The proposed standard still contains requirements that mandate the use of, and training to include 3 part communications during issuance of all Operating Instructions, including those issued during non-Emergency situations. As stated in the Rationale and Technical Justification document the proposed Measures and RSAW don’t specifically require that auditors verify compliance of this for the Requirements (and associated Measures), however a strict read leads us to a different conclusion. Under the RSAW for R1 it states that the entity shall provide its documented communications protocols developed for this requirement and the auditor shall review the documented communications protocols provided by the entity and ensure they address the Parts of R1 (including the use of 3 part communications). The RSAW contains similar actions relative to Requirements R2 and R3 in that the entity is to provide evidence consisting of agendas, learning objectives, or course materials that it provides pursuant to these requirements. Given this, an auditor can enforce to a ‘zero defect tolerance’ if the auditor chooses to do so, and in fact would argue that an audit would be deficient if it failed to validate whether the learning objective included ensuring that 3 part communication was used during issuance or receipt of each Operating Instruction.

Suggest that the training requirements contained with R2 and R3 be removed and placed within the PER-005 Operations Personnel Training standard. PER-005 should be the home of all system operator related training requirements.

There are no clear and concise differences between Requirements R1, R5 and R6. This creates uncertainty as to whether the Operating Instruction is being issued to alleviate or avoid an Emergency. Absent a Requirement that the issuer make a definitive statement as to whether an Operating Instruction is being issued to alleviate or avoid an Emergency, neither the recipient (during) nor an auditor (after) would be able to make such determination.

Suggest revising Requirement R1 so that it applies to all Operating Instructions, but requires that those being issued to alleviate or avoid an Emergency be specifically identified as such and that the issuer explicitly request that the recipient confirm their understanding through use of 3 part communication.
Remove Requirements R5, R6 and R7 (incorporating items deemed necessary by the SDT as bullets or Parts of R1).

Suggested rewording for Part 1.1:

1.1. Require that its operating personnel identify, at the time of issuance, that the Operating Instruction is being issued to alleviate or avoid an Emergency.
   • Request recipient use 3 part communication when the Operating Instruction is being issued to alleviate or avoid an Emergency.

Revise M1, VRF/VSLs and RSAW so that strict compliance with use of 3 part communication is only applied when an Operating Instruction is issued to alleviate or avoid an Emergency as identified by the issuer at the time of issuance.

Suggested revisions to M1:

M1. Each Balancing Authority, Reliability Coordinator, and Transmission Operator shall provide its documented communications protocols developed for Requirement R1. For each Operating Instruction issued to alleviate or avoid an Emergency; entity shall provide evidence that it identified such at time Operating instruction was issued (R1.1) and requested recipient use of 3 part communication (R1.2).

VSL for R1 – modify Severe to include any instance where entity either (1) failed to identify, at the time of issuance, that the Operating Instruction is being issued to alleviate or avoid an Emergency or (2) failed to request recipient use 3 part communication when the Operating Instruction was issued to alleviate or avoid an Emergency

Measure M4 requires compliance demonstration beyond Requirement R4. Specifically, entities must provide evidence that appropriate corrective action was taken for all instances where an operating personnel’s non-adherence to the protocols developed in Requirement R1 is the sole or partial cause of an Emergency.

The format of the standard should be changed to conform with the current NERC direction—the measures get listed with the associated requirement, and the rationale get included in the standard, not a separate document.