Unofficial Comment Form
Interpretation of COM-002-2 – Communications and Coordination R2 for the
ISO/RTO Council (Project 2009-22)

Please DO NOT use this form to submit comments. Please use the electronic comment form to submit comments on the Interpretation of COM-002-2 — Communications and Coordination R2 for the ISO/RTO Council (Project 2009-22). Comments must be completed by November 17, 2011.

2009-22 Project Page

If you have questions please contact Joseph Krisiak by email at Joseph.Krisiak@nerc.net or by telephone at 609-651-0903.

Background Information
On October 1, 2009, clarification was requested by ISO-RTO Council on requirement R2, specifically on whether “directives” are limited to actual and anticipated emergency operating conditions, or whether routine operating instructions are also considered “directives.”

A drafting team was formed and prepared a draft interpretation, which was posted for a 30-day informal comment period that ended December 18, 2010. However, the effort was delayed following discussion with the requester based on the anticipation that more clarity regarding the term, “directives” would be identified through standard development work in Project 2007-02. Reprioritization of the total standards workload (with interpretations given a lower priority than standards development in accordance with guidance from the NERC Board of Trustees issued November 2009) resulted in further delay. Additional delay was created as Standards Committee developed more formal processes for addressing interpretations were developed. The Standards Committee directed that work resume on the Interpretation in April 2011. The OPCPSDT, which was previously working on this Interpretation, re-commenced work in June 2011 and reached consensus in September 2011.

The drafting team primarily based its interpretation on the purpose statement of the standard, which reads:

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.

The drafting team has interpreted this to mean that the standard should only apply during emergencies, and that routine operating instructions during normal operations would not require the communications protocols for repeat backs as specified in R2.

To the extent entities are seeking to modify the definition of the word “directive,” such changes cannot be made though the interpretation process. However, that definition is within the scope of other drafting teams that are currently working on revisions to this and related standards, and comments should be provided to those teams directly.

Regarding modifications made to the interpretation since its last posting, the SDT eliminated the statement “routine operating instructions can be directives,” as commenters felt it added
confusion. Additionally, some commenters suggested a sentence regarding electronic communications should be removed. The SDT agreed that the sentence went beyond the question asked, and removed the sentence. With these changes, the SDT believe it has addressed the majority of the concerns raised with the original interpretation.

Please use this form to record comments for the drafting team.

You do not have to answer all questions. Enter All Comments in Simple Text Format.

Insert a “check” mark in the appropriate boxes by double-clicking the gray areas.

Please review the request for an interpretation, the associated standard, and the draft interpretation and then answer the following questions.

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?
   - The request is asking for clarity on the **meaning** of a requirement.
   - The request is asking for clarity on the **application** of a requirement.
   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?
   - The interpretation expands the reach of the standard.
   - The interpretation does not expand the reach of the standard.
   Comments:

3. Do you agree with this interpretation? If not, why not.
   - Yes
   - No
   Comments:

4. If you have any other comments that you have not already provided in response to the prior questions, please provide them here.
   Comments: