Unofficial Comment Form
Project 2007-02 Operating Personnel Communications Protocols COM-003-1

Please DO NOT use this form. The drafting team is posting the draft COM-003-1 Operating Personnel Communications Protocols standard for industry comment for a 30-day comment period. Please use the electronic comment form located at the link below to submit comments. Comments must be submitted by April 5, 2013. If you have questions please contact Joseph Krisiak at Joseph.Krisiak@nerc.net or by telephone at 609-651-0903.


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 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 to be done 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 Bulk Electric System will efficiently convey information and ensure mutual understanding. The August 2003 Blackout Report, Recommendation Number 26, calls for a tightening of communications protocols. This proposed standard’s goal is to ensure that effective communication is practiced and delivered in clear language and standardized format via pre-established communications paths among pre-identified operating entities.

The SAR indicated that references to communication protocols in other NERC Reliability Standards may be moved to this new standard. The SAR instructed the standard drafting team to consider incorporating the use of Alert Level Guidelines and three-part communications in developing this new standard to achieve high level consistency across regions. The Standard Drafting Team (SDT) believes the Alert Level Guidelines, while valuable, belong in a separate standard and has petitioned the Standards Committee to approve the transfer to another standard or to start a separate project.

The upgrade of communication system hardware where appropriate is not included in this project (it is included in NERC Project 2007-08 Emergency Operations).
The standard will be applicable to Transmission Operators, Balancing Authorities, Reliability Coordinators, Generator Operators (GOPs), and Distribution Providers (DPs). These requirements ensure that communications include essential elements such that information is efficiently conveyed and mutually understood for communicating changes to real-time operating conditions and responding to directives, notifications, directions, instructions, orders, or other reliability related operating information.

The Purpose statement of COM 003-1 states: “To provide System Operators predefined communications protocols that reduce the possibility of miscommunication that could lead to action or inaction harmful to the reliability of BES.”

1) **New NERC Glossary terms**: The SDT has maintained the definition of “Operating Instructions” proposed in the Standard version 4.

Operating *Instructions* differentiate the broad class of communications that deal with changing or altering the state of the BES from general discussions of options or alternatives. Changes to the BES operating state with unclear communications create increased opportunities for events that could place the bulk electric system at an unacceptable risk of instability, separation, or cascading failures.

This term is proposed for addition to the NERC Glossary to establish meaning and usage within the electricity industry.

2) **COM-003-1, Draft 5 now features 4 requirements**: The “*Implement, in a manner that identifies, assesses and corrects deficiencies, documented communication protocols for Operating Instructions between Functional Entities*” language has wide acceptance within industry, but concerns over compliance with internal controls caused great concern for some draft 4 commenters. The requirement structure and language has been changed in draft 5 based on changes to the standard recommended by Industry representatives at the “Communications in Operations Conference” of February 14-15, 2013 in Atlanta to allow applicable entities more flexibility to develop their communication protocols and to develop methods to assess operators’ communication practices and implement corrective actions necessary to meet the expectations in its documented communication protocols. Implementation means incorporating the communication protocols into policies, procedures, training programs and assessment programs to support setting and attaining the communication expectations of operators (R3) and System Operators (R1). The OPCP SDT believes draft 5 shifts the focus to improving the entity’s communication protocols, from a focus on whether the entity’s internal controls are “compliant”.
3) **Documented Communication Protocols**: The OPCP SDT has incorporated requirements R1 and R3, for an applicable entity to develop and implement documented communication protocols that address, where applicable, the following elements: (note: the word address was recommended by draft 4 commenters and by a consensus at the “Communications in Operations Conference” of February 14-15, 2013 in Atlanta).

a) **English language**: Use of the English language when issuing an oral or written Operating Instruction between functional entities, unless another language is mandated by law or regulation.

b) **Time Identification**: Instances that require time identification when issuing an oral or written Operating Instruction or Reliability Directive, and the format for that time identification.

c) **Line and Equipment Identifiers**: Nomenclature for Transmission interface Elements and Transmission interface Facilities when issuing an oral or written Operating Instruction or Reliability Directive.

d) **Alpha-numeric clarifiers**: Instances where alpha-numeric clarifiers are necessary when issuing an oral Operating Instruction or Reliability Directive, and the format for those clarifiers.

e) **Three-part Communication**:

Instances where the issuer of an oral two party, person-to-person Operating Instruction, is required to:

- Confirm that the response from the recipient of the Operating Instruction was accurate, or
- Reissue the Operating Instruction to resolve a misunderstanding.

Require the recipient of an oral two party, person-to-person Operating Instruction to repeat, restate, rephrase, or recapitulate the Operating Instruction, if requested by the issuer.

**One-way burst messaging system to multiple parties (all call)**: Instances where the issuer of an oral Operating Instruction or Reliability Directive using a one-way burst messaging system to communicate a common message to multiple parties in a short time period (e.g. an All Call system) is required to verbally or electronically confirm receipt from at least one receiving party.

Require the receiver of an oral Operating Instruction or Reliability Directive using a one-way burst messaging system to communicate a common message to multiple parties in a short time period (e.g. an All Call system) to request clarification from the initiator if the communication is not understood.
f) **Three-part Communication: For Distribution Providers (DP) and Generator Operators (GOP):** Require the recipient of an oral two party, person-to-person Operating Instruction to repeat, restate, rephrase, or recapitulate the Operating Instruction, if requested by the issuer.

g) **One-way burst messaging system to multiple parties (all call): For Distribution Providers (DP) and Generator Operators (GOP):** Require the receiver of an oral Operating Instruction or Reliability Directive using a one-way burst messaging system to communicate a common message to multiple parties in a short time period (e.g. an All Call system) to request clarification from the initiator if the communication is not understood, if required by the issuer.

h) **Uniformity of communication protocols among entities:** Coordination with affected Reliability Coordinators’, Balancing Authorities’, Transmission Operators’, Distribution Providers’, and Generator Operators’ communication protocols.

4) **Violation Risk Factor (VRF) and Violation Severity Level (VSL) changes from version three:** The OPSDT reviewed the VRFs and VSLs associated with R1, R2, R3, R4 and made changes to more closely conform to NERC and FERC guidelines.

The SDT is proposing to retire Requirement R4 from COM-001-1.1 and incorporate it into Requirement R1 and R3 of this draft COM-003-1. Since Requirement R4 from COM-001-1.1 carries over essentially unchanged there is no specific question related to it in this Comment Form.

The choice of VRFs was made on the basis of the potential impact on the Bulk Electric System of a miscommunication during Operating Instructions. Requirements R2 and R4 are assigned a Medium Violation Risk due to their potential direct impact on BES reliability.

Time Horizons were selected to reflect the period within which the requirements applied. Requirements R1 and R3 must be implemented in long term planning operations and therefore were assigned a Time Horizon of Long Term Planning. R2 and R4 must be implemented in Operations planning and Operations Assessment Time Horizons.
Questions

1. The SDT has proposed new language in COM-003-1, R1 and R3: “Each Balancing Authority, Reliability Coordinator, and Transmission Operator shall develop and implement documented communication protocols that outline the communications expectations of its System Operators. The documented communication protocols will address, where applicable, the following:” (the same language exists for R3, except DPs and GOPs listed as applicable entities and the use of “operators” instead of “System Operators”). Do you agree with the changes made to the proposed definition “Operating Instruction” (now proposed as a “A command by a System Operator of a Reliability Coordinator, or of a Transmission Operator, or of a Balancing Authority, where the recipient of the command is expected to act, 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. Discussions of general information and of potential options or alternatives to resolve BES operating concerns are not commands and are not considered Operating Instructions.”) to be added as a term for the NERC Glossary? Do you agree with these proposed requirement changes? If not, please explain in the comment area of the last question.

☐ Yes
☐ No

2. The SDT has proposed new language in COM-003-1, R2 and R4: “Each Balancing Authority, Reliability Coordinator, and Transmission Operator shall develop method(s) to assess System Operators’ communication practices and implement corrective actions necessary to meet the expectations in its documented communication protocols. (the same language exists for R3, except DPs and GOPs listed as applicable entities and the use of “operators” instead of “System Operators”). ” Do you agree with these proposed requirement changes? If not, please explain in the comment area of the last question.

☐ Yes
☐ No

3. Do you agree with the VRFs and VSLs for Requirements R1, R2, R3 and R4?

☐ Yes
☐ No

4. Do you have any other comments or suggestions to improve the draft standard?

Comments: Requirement 3 is an administrative requirement that does little to benefit the reliable operation of the BES. By specifically calling out “Directives” in the requirement it creates the potential for double jeopardy with other requirements such as COM-002, IRO-001 and TOP-001 which all speak to following Directives. Requiring a documented communications protocol when the only responsibility is repeat back the instruction as received and seek clarification if the directive is misunderstood is beyond the intended scope of the reliability program in general. This requirement should be removed.
Requirement 4 should be removed because it is unnecessary and excessive. The smaller entities that this will affect do not record phone conversations and it would be difficult to assess performance based on the very low number of “Operating Instructions” or “Directives” that these entities actually receive. The performance of “Operating Instructions” should be the proof. A better approach would be to amend the above mentioned standards (IRO, TOP, COM) to include “Operating Instructions” along with Directives.

The term “All Call” is used in Requirement 1 Part 1.8. It should be defined in the NERC Glossary. If it isn’t to be defined, then it should not be capitalized.

Regarding Requirement 1 Part 1.8, and Requirement 3 Part 3.3, the receiver of an oral Operating Instruction or Reliability Directive from a one-way burst messaging system is “to request clarification from the issuer is the communication is not understood.” What if the receiver never gets the issued Operating Instruction or Reliability Directive?

Regarding Requirement 1 Part 1.8, and Requirement 3 Part 3.3, suggest changing “using” to “from” to make them read “Require the receiver of an Oral Operating Instruction or Reliability Directive from a one-way burst...”