Project 2007-02 Operating Personnel Communications Protocols

Unofficial Comment Form for Standard COM-003-1 — Operating Personnel Communications Protocols

Please **DO NOT** use this form. Please use the [electronic comment form](http://www.nerc.com/filez/standards/Op_Comm_Protocol_Project_2007-02.html) located at the link below to submit comments on the proposed draft COM-003-1 Operating Personnel Communications Protocols standard. Comments must be submitted by **July 19, 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 SDT). 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. FERC Order 693 paragraph 532 amplifies this need. This proposed standard’s goal is to ensure that effective communication is practiced and delivered in clear language and standardized format.

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 003-1 states: “To strengthen communications for the issuance of Operating Instructions with predefined communications protocols that reduce the possibility of miscommunication that could lead to action or inaction harmful to the reliability of the Bulk Electric System.”

1) **New NERC Glossary terms**: The SDT has added language to the previous definition of “Operating Instructions” proposed in the Standard version 5 to further clarify the distinction between an “Operating Instruction” and a “Reliability Directive.” 

“Operating Instructions” differentiates the broad class of communications that deal with changing or altering the state of the BES from general discussions of options or alternatives; and from Reliability Directives that apply to Adverse Reliability Impacts and Emergencies on the BES. 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 6 now features 3 requirements.** The requirement structure and language has been changed in draft 6 based on changes to the standard recommended by Industry representatives who commented on draft 5 and from Industry representatives who participated in the Informal Review of the proposed draft 6 standard. The language in COM-003-1, draft 6, R1 retained from the “Communications in Operations” Conference of February 14-15, 2013, in Atlanta still permits applicable entities flexibility to develop their communication protocols, but requires applicable entities to **develop the protocols, subject to the Reliability Coordinator’s approval.** This addresses commenters’ concerns over uniformity within Reliability Coordinator control areas.

The assess and correct language has been removed (COM-003-1, draft 5, R2 and R4) based on concerns over compliance with internal controls. Rather than focus on internal controls and System Operator performance improvement controls, the COM-003-1, draft 6, R2 and R3 requirements now focus on **misuse or lack of use of the communication protocols (developed in COM-003-1, draft 6, R1)** resulting in the issuance of a Reliability Directive. This approach requires the entity to manage the effective use of their governing communication protocols to avoid a situation that will initiate an Adverse Reliability Impact or an Emergency on the BES. This directly links communication to a reliability result, which is a recommendation offered by commenters in the last 5 drafts.

**Documented Communication Protocols:** The OPCPSDT has retained requirement COM-003-1, draft 5, Requirement R1 and eliminated COM-003-1, draft 5, Requirement R3, which addressed communication protocols for entities that are solely receivers of Operating Communications (DPs and GOPs). R1 in Draft 6 requires an applicable entity to jointly develop, subject to the Reliability Coordinator’s approval, documented communication protocols for the issuance of Operating Instructions in that Reliability Coordinator’s area, that ,if applicable will address the following elements:

a. **English language:** Requirement R1 Part 1.1 – The use of the English language when issuing or responding to an oral or written Operating Instruction, unless another language is mandated by law or regulation.

b. **Time Identification:** Requirement R1 Part 1.2 – The instances, if any, which require time identification when issuing an oral or written Operating Instruction and the format for that time identification.

c. **Line and Equipment Identifiers:** Requirement R1 Part 1.3 – The nomenclature for Transmission interface Elements and Transmission interface Facilities when issuing oral or written Operating Instructions.

d. **Alpha-numeric clarifiers:** Requirement R1 Part 1.4 – The instances, if any, where alpha-numeric clarifiers are necessary when issuing an oral Operating Instruction and the format for those clarifiers.
e. **Three-part Communication:** Requirement R1 Part 1.5. The instances where the issuer of an oral two party, person-to-person Operating Instruction requires the receiver to repeat, restate, rephrase, or recapitulate the Operating Instruction and the issuer to:

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

**Eliminated in Draft 6 by OPCPSDT:**

- **One-way burst messaging system to multiple parties (all call)** based on industry comments. Requirement R1 Part 1.7, Requirement R1 Part 1.8
- **One-way burst messaging system to multiple parties (all call)** based on industry comments. Requirement R3 Part 3.3
- **Uniformity of communication protocols among entities** (Requirement R1 Part 1.9) Based on industry comments replaced 1.9 with change to R1 language to jointly develop and issue communication protocols within a Reliability Control area.

3) **VSL and VRF Changes from version five:** The OPCPSDT modified the VRFs and VSLs associated with R1, R2, and R3, to conform to NERC and FERC guidelines.

The SDT is proposing to retire Requirement R4 from COM-001-1 and incorporate it into Requirement R1 of COM-003-1. Since Requirement R4 from COM-001-1 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 R1 is assigned a Low Violation Risk Factor due to its level of risk on BES operations. Requirements R2 and R3 are assigned a Medium Violation Risk Factor due to their more direct impact on BES reliability.

Time Horizons were selected to reflect the period within which the requirements applied. Requirements R1 must be implemented in long term planning operations and therefore is assigned a Time Horizon of Long Term Planning. R2 and R3 must be implemented in the Real Time Horizon. The drafting team is posting the standard for industry comment for a 30-day comment period.

The Operating Personnel Communications Protocols Drafting Team would like to receive industry comments on this draft standard. Accordingly, we request that you include your comments on this form by **July XX, 2013**.
Comment Form

*Please use the electronic comment form to submit your final comments to NERC.

1. The OPCPSDT has proposed significant changes to the COM-003-1, draft 6. Do you agree that COM-003-1, draft 6 addresses the August 2003 Blackout Report Recommendation number 26, FERC Order 693 and the COM-003-1 SAR? If not, please explain in the comment area of the last question.

☐ Yes
☒ No

Comments: The introduction of the condition in R2 “so that the failure to use the protocols by the issuer of an Operating Instruction does not result in an operating condition that requires the issuance of a Reliability Directive by the original issuer of the Operating Instruction or by another Balancing Authority, Reliability Coordinator, or Transmission Operator.” creates a number of issues with the standard.

a. The issuance of a Reliability Directive may be caused by a number of reasons, for example, the operating instruction (repeated or otherwise) may not be sufficient to address a potential condition that has an Adverse Reliability Impact;
b. The operating instruction that is communicated, with or without adhering to the protocols developed in R1, is in fact moving other system conditions from a reliable state to one that has a potential of having Adverse Reliability Impact, for which a Reliability Directive needs to be issued after implementing the communicated operating instruction.
c. The operating personnel may second guess whether or not a Reliability Directive will be issued if the established communication protocols are not implemented (such as by requiring 3-part communication) before it takes the required action. This puts the need to comply with a requirement into a condition assessment mode, which defies the purpose of having a reliability standard to manage risk and meet performance expectation whose reliability outcome are predetermined, not on the fly.
d. The added condition is a compliance assessment element with which to gauge violation severity or sanction; itself not a requirement. By introducing this to the requirement, it convolutes the requirement, adds nothing to meeting the reliability objectives, and may in fact jeopardize reliability. And what if a Reliability Directive was not issued despite the failure of Responsible Entity to implement its communication protocol? Is the Responsible Entity deemed compliant with the requirement? If so, do Requirements R2 and R3 drive the right behaviors? If not, then what’s the value and influence of the added condition in the assessment outcome?
Requirement R1 clearly requires the responsible entity to develop documented communication protocols for the issuance of Operating Instructions. By Part 1.5, the instances where the issuer of an oral two party, person-to-person Operating Instruction requiring the receiver to repeat, restate, rephrase, or recapitulate the Operating Instruction and subsequent actions by the issuer are already clearly stipulated in the documented communication protocols. Responsible entities simply need to implement the protocols as documented, regardless of whether failure to do so would result in having to issue a Reliability Directive, or any other possible outcomes, for that matter.

Similar comments apply to Requirement R3 when the responsible entities are required to close out the last part of the 3-part communication.

The suggested rephrasing of the Purpose statement “To strengthen communications...” could be misleading. Communications could be strengthened with better equipment as well, but the intent of COM-003 is to deal only with communications protocols. Suggest changing the language to that which is found in the technical guidance document, “Enhance the effectiveness of communications...”

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

☑ Yes

☐ No

Comments: We agree with the VRFs, but not the VSLs because of the concerns with Requirements R2 and R3. We do not agree with the Long-term Planning Time Horizon for R1. Developing and documenting communication protocols for use during real-time operations is an operational planning process (or mid-term planning, at most), not a long-term planning process. We suggest to change the Time Horizon to Operations Planning.

Regarding the Implementation Plan, it conflicts with Ontario regulatory practice with regards to the effective date of the standard. It is suggested that this conflict be removed by appending to the effective date wording, after “applicable regulatory approval” in the Effective Dates Section of the Implementation Plan:

“, or, in those jurisdictions as otherwise made effective pursuant to the laws applicable to such ERO governmental authorities.”