Comment Form for Reliability Coordination – Project 2006-06

Please DO NOT use this form. Please use the electronic comment form to submit comments on the proposed revisions to COM-001-2, IRO-001-2, IRO-002-2 and IRO-005-4. Comments must be submitted by March 7, 2011. If you have questions please contact Stephen Crutchfield at stephen.crutchfield@nerc.net or by telephone at 609-651-9455.

### Individual Commenter Information

(Complete this page for comments from one organization or individual.)

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<th>NERC Region (check all Regions in which your company operates)</th>
<th>Registered Ballot Body Segment (check all industry segments in which your company is registered)</th>
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<td>☐ ERCOT</td>
<td>1 — Transmission Owners</td>
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<td>☐ 10 — Regional Reliability Organizations and Regional Entities</td>
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Group Comments (Complete this page if comments are from a group.)

**Group Name:** IRC Standards Review Committee

**Lead Contact:** Albert DiCaprio

**Contact Organization:** PJM

**Contact Segment:** ISO & RTO

**Contact Telephone:** 610 – 666 – 8854

**Contact E-mail:** dicapram@pjm.com

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*If more than one Region or Segment applies, please list all that apply. Regional acronyms and segment numbers are shown on prior page.*
Comment Form — Reliability Coordination Project 2006-06

Background Information:
Based on comments received on the last posting, the RCSDT has revised the proposed definitions in COM-001-2 as:

**Interpersonal Communication:** Any medium that allows two or more individuals to interact, consult, or exchange information.

**Alternative Interpersonal Communication:** Any method Interpersonal Communication that is able to serve as a substitute for, and is redundant to normal Interpersonal Communication and does not utilize the same infrastructure (medium) as, normal Interpersonal Communications used for day-to-day operation.

The RCSDT believes that these are better, more concise definitions.

The RCSDT reviewed the Interpersonal Communications capability requirements (COM-001) and determined that there were implicit requirements within the requirements. For example, the requirement to identify an Alternative Interpersonal Communications capability implied that an entity had an interpersonal Communication capability. Rather than leave these requirements implicit, the RCSDT explicitly delineated, by entity, the requirements for Interpersonal Communications capability and Alternative Interpersonal Communications capability. These explicit requirements are R1 through R8.

Minor clarifying revisions were made to R2 and R3 of COM-002-2 and the words “actual or expected” were removed from the proposed definition of Adverse Reliability Impacts. The RCSDT believes that these conforming revisions indicate that consensus has been achieved with respect to COM-002-2.

The RCSDT also is seeking stakeholder input with regard to a FERC Order 693 directive to consider Xcel’s comments relating to COM-002. The comment is as follows:

Paragraph 523: "NERC should consider Xcel’s suggestion that the entity taking operating actions should not be held responsible for the delays caused by the reliability coordinator’s assessment and approval. We note that the operating entity has the authority to take emergency actions to protect its system that may circumvent or preempt the reliability coordinator’s approval process under TOP-001-1 Requirement R3 in cases of personnel safety, potential equipment failure or environmental needs."

The RCSDT agrees with FERC that an entity has the right and obligation to take action to prevent or mitigate emergencies, etc. Footnote 226 of Order 693 discusses TOP-001 requirements:

Footnote 226: TOP-001-1, R1 states in part “Each transmission operator shall have the responsibility and clear decision-making authority to take whatever actions are needed to ensure the reliability of its area ....” and R2 states in part “Each transmission operator shall take immediate actions to alleviate operating emergencies ....”.

The RCSDT believes that these requirements obviate the need to develop additional requirements to address Xcel’s comment.

The RCSDT also met with FERC staff regarding the requirements contained in the proposed IRO-001. A suggestion was made to move some of the proposed requirements to IRO-002.
and IRO-005, as these requirements did not meet the purpose of the proposed IRO-001 standard. The proposed IRO-001 standard is the “umbrella” standard that established Reliability Coordinators and their authority. The requirements that were subsequently re-inserted into IRO-002 and IRO-005 pertained to analysis tool outages and Reliability Coordinator notifications respectively.

The drafting team also re-introduced into IRO-001 the requirement for regions to establish Reliability Coordinators. The requirement is now applicable to Regional Entities and calls for the RE to “ensure at least one or more Reliability Coordinators is certified to continuously assess transmission reliability and coordinate emergency operations among the operating entities within the region and across the regional boundaries”. This requirement was originally proposed to be retired, however, after discussion with NERC legal staff the RCSDT proposed to retain the requirement and revise it as shown in the draft.

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.

1. Do you agree with COM-001 requirements for Interpersonal Communications capability and Alternative Interpersonal Communications capability (R1-R8)? If not, please explain in the comment area below.

   □ Yes
   ☒ No

   Comments: It was expressed in the last posting that the definition of Interpersonal Communications might inadvertently include data. The SDT responded that it does not by referring to Interpersonal in the wording of the definition. The word being defined shouldn’t be in the definition. However, incorporating “allows two or more individuals to …” is an option that may solve this problem. The next posting should clarify this.

   This standard does not comport with the informational filing that NERC submitted to FERC on August 10, 2009 regarding its discontinued use of sub-requirements in standards development activities. The sub-requirements should be modified into bulleted lists.

   Consider striking “to exchange Interconnection and operating information” in R1, R3, R5, R7, and R8. It is redundant to the use of Interpersonal Communications “to interact, consult, or exchange information” in the definition.

   Consider striking “to exchange Interconnection and operating information” in R2, R4, R6. It is redundant to the use of Alternative Interpersonal Communications which uses Interpersonal Communications in its definition. Interpersonal Communications includes “to interact, consult, or exchange information” in its definition.

   For R2, why is Interchange Coordinator excluded? It is included in the Requirement R1 which deals with the Interpersonal Communications. Communications would need to be maintained with the Interchange Coordinator in the event of a failure of the Interpersonal Communications.

   For R3, affected neighboring Transmission Operators should be included.

   For R4 and R6, the sub-requirement list is different from the associated Interpersonal Communications requirements R3 and R5 respectively. These should be duplicate. The sub-requirement list for R4 should match R3, and the sub-requirement list for R6 should match R5. In the event of a failure of the Interpersonal
Communications, the Transmission Operator and Balancing Authority both would need to maintain communications to the same entities as in the requirement to have Interpersonal Communications. The sub-requirements should be bulleted lists.

For R5, why are neighboring Balancing Authorities not included? Additionally, R5 should only read Contact with Interchange Coordinator within the same Interconnection. They need to be able to contact one another to identify discrepancies in scheduling and sources of meter error that could lead to deviations in ACE.

Should R2, R4 and R6 be constructed parallel to R1, R3, and R5? In R1, R3 and R5, the requirement is “shall have” while in R2, R4, and R6, the requirement is “shall designate”. Since one is for the Interpersonal Communications and the other is for the Alternative Interpersonal Communications, the same wording should be used.

R2.2 and R1.2 should not be limited to Reliability Coordinators in the same Interconnection only. Modify “within the same Interconnection” to “within the same Interconnection, and, as appropriate, between a-synchronously connected RCs which are not precluded by law from scheduling interchange energy (for schedule changes, curtailments, etc.)” since reliability coordination may be required among the RCs on both sides of an Interconnection boundary.

The VSLs for R1 through R8 should be expanded to include multiple levels based on the number of entities that the functional entity does not have Interpersonal Communications or Alternative Interpersonal Communications with. FERC specified their general preference for gradated in paragraph 27 of their June 19, 2008 order on VSLs.

The second half of the Severe VSL for R9 is almost a duplicate of the Lower VSL. There are some small changes in the wording but both situations deal with the case where there is a problem that has been identified with the Interpersonal Communications system and it takes more than two hours to initiate repair.

2. **The RCSDT believes that the requirements of TOP-001-1 obviate the need to develop additional requirements to address Xcel’s comment. Do you agree? If not, please explain in the comment area below.**

   ☐ Yes  ❌ No

   **Comments:** If the requirement were going to remain, but the Project 2007-03 Real-Time Operations SDT proposed to retire that requirement during their last posting. There needs to be better coordination with that SDT.

3. **Do you agree with the revision to IRO-001, R1 for certifying Reliability Coordinators? If not, please explain in the comment area below.**

   ☐ Yes  ❌ No

   **Comments:** The language “to continuously assess transmission reliability” should be changed to “to continuously assess Bulk Electric System reliability” to reflect what the enforceability of the standards are meant to be. The requirement on the ERO should also be expanded similar to BAL-005-0.1b R1 to ensure that all operating entities and the entire BES are covered under a Reliability Coordinator.

   In R2, should “of” be “to”? Reliability Directives are issued to TOPs, BA, etc.

   The VSL for R1 is not consistent with the requirement. The requirement applies to the ERO but the VSL applies to the Regional Entity.
4. Do you agree with moving two requirements from IRO-001 back to IRO-002 relating to Analysis Tool outages? If not, please explain in the comment area below.

☑ Yes
☐ No
Comments:

5. Do you agree with moving two requirements from IRO-001 back to IRO-005 relating to Reliability Coordinator notifications? If not, please explain in the comment area below.

☐ Yes
☑ No
Comments: R1 states “When the results of an Operational Planning Analysis or Real-time Assessment indicate an expected or actual condition with Adverse Reliability Impacts within its Reliability Coordinator Area, each Reliability Coordinator shall notify issue an alert to all impacted Transmission Operators and Balancing Authorities in its Reliability Coordinator Area.” The word “notify” should be stuck.

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

Comments: The SDT did not address all concerns with COM-002-3 from the last posting. For entities registered as multiple functions, the combination of the definition of Reliability Directive and Requirement R1 could be confused to require a company to issue directives to itself. There are several organizations registered as a Reliability Coordinator, Transmission Operator and Balancing Authority. In these companies, it is not uncommon for those responsibilities to be distributed across multiple desks. Thus, for certain situations, a single System Operator may actually be the Reliability Coordinator and the Transmission Operator. In other situations, the System Operator serving the Reliability Coordinator function may be adjacent to the System Operator serving as the Transmission Operator or Balancing Authority. It should never be necessary for these System Operators to issue Reliability Directives to themselves in the first example or to their co-worker in the second example to demonstrate compliance to NERC standards. How the entity coordinates its actions among its Reliability Coordinator, Balancing Authority and Transmission Operator roles is a corporate governance issue that should not be confused or complicated by the NERC standards. Thus, standards should be made clear that the Reliability Directive is directed to another company.

In place of requiring an operator, in real-time, to state “this is a Reliability Directive,” there should be an allowance for an entity to develop procedures indicating, in advance, their expectations for three-part communications to their sub-operating entities. Therefore, we suggest modifying R1 to be “When a Reliability Coordinator, Transmission Operator or Balancing Authority requires actions to be executed as a Reliability Directive, the Reliability Coordinator, Transmission Operator or Balancing Authority shall identify the action, either verbally, when the communication is issued, or in advance through documented procedures, as a Reliability Directive to the recipient. [Violation Risk Factor: High] [Time Horizon: Real-Time]” Also, the definition of Emergency as currently cited in these draft Standards and included in the existing NERC Glossary should be modified to include the NERC Glossary term Adverse Reliability Impact to make the Standards more crisp, clear and enforceable.

Because the Project 2007-03 Real-Time Operations SDT proposed to utilize the definition of Adverse Reliability Impact in TOP-001-2 R5 during the last posting, the change to the definition should be coordinated with that team.
There is a text box in IRO-005-4 that indicates this standard will be retired. Yet, there still remain requirements in the standard and various other associated documentation that indicates requirements are being move to this standard. Delete the text box.

Strike IRO-014-2 Part 1.7. There is no need to have a weekly conference to discuss every Operating Procedure, Operating Process and Operating Plan. As this requirement is written, a conference call would be necessary for each. Furthermore, IRO-014-2 R4 already includes a requirement to have weekly conference calls that should suffice. IRO-014-2 R2 seems to recognize that these Operating Procedures, Processes and Plans likely will not need to be discussed weekly as it only requires an annual update.

Requirement R2 in IRO-001 contains the words “which could include issuing Reliability Directives”, but Reliability Directives are not referenced anywhere else in the standard. This inclusion seems unnecessary since without it, R2 already requires that the RC take actions or direct actions by others to prevent identified events or mitigate the magnitude or duration of actual events that result in Adverse Reliability Impacts. Whether or not a Reliability Directive is issued is irrelevant in this requirement. These words should be removed. Note that COM-002 already stipulates the requirement for 3-part communication when a Reliability Directive is issued. The inclusion of “which could include issuing Reliability Directives” in IRO-001 is unnecessary.