

UNOFFICIAL Comment Form for Reliability Coordination — Project 2006-06

Please DO NOT use this form. Please use the electronic comment form located at the link below to submit comments on the proposed revisions to the standards for Project 2006-06: Reliability Coordination. Comments must be submitted by **August 9, 2009**. If you have questions please contact Stephen Crutchfield at stephen.crutchfield@nerc.net or by telephone at 609-651-9455.

http://www.nerc.com/filez/standards/Reliability_Coordination_Project_2006-6.html

Background Information:

The Reliability Coordination Standards Drafting Team (RC SDT) was tasked with 1) ensuring that the reliability-related requirements applicable to the Reliability Coordinator are clear, measurable, unique and enforceable, 2) ensuring that this set of requirements is sufficient to maintain reliability of the Bulk Electric System, and 3) revising the group of standards based on FERC Order 693.

During the course of the project, the NERC standards staff revised the Reliability Standards Development Plan and noted several areas of overlapping scope between certain projects. The original SAR for Project 2006-06 called for revisions to PER-004 — Reliability Coordination — Staffing and PRC-001 — System Protection Coordination. Based on scope overlap, it was determined that PER-004 and PRC-001 would best be served by moving the proposed work to Project 2006-01: System Personnel Training and Project 2007-06: System Protection, respectively.

The RC SDT proposed revisions to the set of standards under the project in August and September 2008. The RC SDT made revisions to the set of standards based on stakeholder feedback and the results of the IROL Standards Drafting Team work. Since the inception of this project, the IROL Standards Drafting Team has proposed, successfully balloted and obtained NERC Board of Trustees approval for three new Standards which included revisions to other IRO standards. With the approval of the IROL set of standards, certain requirements were retired from other IRO standards (see below summaries for specific examples under the RC SDT project).

Requirements, Measures and Violation Severity Levels in COM-001-2

Requirements: The RC SDT received several comments regarding the intent of the term “telecommunications facilities”. For COM-001-2, the RC SDT envisions telecommunications to be voice or message communication between operating personnel. The standard has been renamed “Communications” and the term “telecommunications facilities” was replaced with “interpersonal communications capabilities” throughout the standards to better reflect the intent of the RC SDT.

We also received comments regarding the applicability of the standard that suggested adding other entities listed in IRO-001 (LSE, PSE, and TSP). The RC SDT contends that, in order to receive and carry out directives, an entity must be able to communicate with the RC...either directly or through other entities (e.g. – a DP may receive the directive from the TOP who received it from the RC). We have not expanded the applicability of Requirements R1 and R2 as suggested as we feel that this expands the standard beyond the reliability - it is not necessary nor is it practical, for reliability purposes, for every entity to have normal and back-up interpersonal communications capabilities with every other entity.

Other commenters had concerns with regard to R2 and the intent with regard to length of outages. The requirement was revised as:

- R2. Each Reliability Coordinator, Transmission Operator and Balancing Authority shall notify impacted entities within 60 minutes of the detection of a failure (30 minutes or longer) of its normal interpersonal communications capabilities. *[Violation Risk Factor: Medium][Time Horizon: Real-time Operations]*

R3 was expanded to include the Transmission Service Provider, Load-Serving Entity, and Purchasing-Selling Entity – to ensure that they use the English language for inter-entity communications. The informational (last) sentence of R3 was removed per stakeholder suggestions.

Measures: Commenters suggested general as well as specific revisions to the measures. One general comment suggested making the language consistent among the measures regarding evidence. M1-M3 were revised to include the phrase “shall have and provide upon request evidence that ...”.

Several commenters suggested revisions to M3. The RC SDT revised M3 based on the comments received suggesting that the applicability be expanded to include Generator Operators, Distribution Providers, Transmission Service Providers, Purchasing-selling Entities and Load-Serving Entities. Several entities commented that M3 did not match R3 which included an explanatory sentence that allowed an entity to use a language other than English for its internal communications. The informational second sentence was removed from Requirement R3, thus eliminating the “disconnect” between the requirement and the measure. All measures were revised as necessary to reflect revisions to requirements.

VSLs: The RC SDT made revisions to the VSLs based on the comments received and also to reflect revisions to the associated requirements. We received comments that the VSLs for R1 and R2 were based on multiple violations. We agreed and revised the VSLs to reflect a single violation.

Requirements, Measures and Violation Severity Levels in COM-002-3

The work of the IROL SDT resulted in the retirement of R1 from the standard. The RC SDT received comments recommending expanding the applicability of the standard and separating Requirement R1 into two distinct requirements. The applicability was expanded to include Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, Transmission Service Provider, Load-Serving Entity, Distribution Provider, and Purchasing-Selling Entity. The requirements were revised to:

- R1. Each Reliability Coordinator, Transmission Operator, and Balancing Authority that issues a directive associated with real-time operational emergency conditions shall require the recipient of the directive to repeat the intent of the directive back; and shall acknowledge the response as correct or repeat the original statement to resolve any misunderstandings. *[Violation Risk Factor: High][Time Horizon: Real-Time]*
- R2. Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, Transmission Service Provider, Load-Serving Entity, Distribution Provider, and Purchasing-Selling Entity that is the recipient of a directive issued per Requirement R1 shall repeat the intent of the directive back to the issuer of the directive. *[Violation Risk Factor: High][Time Horizon: Real-Time]*

The purpose statement was also revised to reflect the revisions to the standard:

To ensure communications by operating personnel are effective.

The RC SDT received comments recommending expanding the applicability of the standard and separating Requirement R1 into two distinct requirements. The applicability was expanded to include Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, Transmission Service Provider, Load-Serving Entity, Distribution Provider, and Purchasing-Selling Entity. The measures were revised to:

M1. Each Reliability Coordinator, Transmission Operator, and Balancing Authority that issues a directive associated with real-time operational emergency conditions shall have evidence such as voice recordings or transcripts of voice recordings to show that it required the recipient of the directive to repeat the intent of the directive back; and acknowledged the response as correct or repeated the original statement to resolve any misunderstandings.

M2. Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, Transmission Service Provider, Load-Serving Entity, Distribution Provider, and Purchasing-Selling Entity that is the recipient of a directive issued per Requirement R1 shall have evidence such as voice recordings or transcripts of voice recordings to show that it repeated the intent of the directive back to the issuer of the directive.

The RC SDT received comments recommending revisions to the VSLs based on revisions to the requirements and measures. The RC SDT did this and created new VSLs for new Requirement R2.

Requirements, Measures and Violation Severity Levels in IRO-001-2

The RC SDT has received a notable number of comments suggesting edits to the proposed requirements and measures for the draft standard, particularly regarding the phrase “without intentional delay.” The comments do not oppose the objective of the phrase, but often point out the issues of measuring intent and measuring delay time.

To maintain the intent while improving the measurability of the requirement, the SDT proposes to modify the standard as follows: delete the phrase ‘without intentional delay’ and leave the obligation of response and timing an unstated requirement of R1 “The RC shall act or direct actions...”

An RC that requires a given action in a given time will be expected to inform the impacted entities of those actions and time requirements. This would obviate the need for providing a measure for “intent”, but still maintain the reliability intent of the original requirement.

The VSLs were revised to reflect revisions to the requirements as well as the comments of stakeholders. Several comments suggested that there was no fundamental difference between the RC “acting” or “directing actions”. The RC SDT agreed and removed the High VSL for R1 and revised the Severe VSL accordingly. Other commenters suggested removing the High VSL from R2 as the VSL contradicted the requirement. The RC SDT agreed and removed the VSL.

Requirements, Measures and Violation Severity Levels in IRO-002-2

Since the inception of this project (2006-06), the IROL Standards Drafting Team has proposed, successfully balloted and obtained NERC Board of Trustees approval for a new Standard IRO-010-1: Reliability Coordinator Data Specification and Collection. The work of the IROL SDT retired IRO-002-2 Requirement R1. The team received comments expressing concern about eliminating the requirement in IRO-002 to monitor frequency. While the Standard Drafting Team (SDT) recognizes the concern raised, the SDT is even more concerned with the subjectivity that any attempt to measure “Monitoring” can provide. It is the SDT’s

contention that adherence to reliability standards that require the said monitoring cannot be demonstrated unless the entity is closely monitoring the system parameters. Furthermore, the SDT contends that any requirements that describe the monitoring facilities needed to fulfill fundamental duties should be embedded in entity certification requirements. With IRO-014 and IRO-001 R1 in place, the actual act of monitoring is a secondary task that is inherent in responding to situations or events that could have an adverse impact on reliability. The team declined to delete R2 (Reliability Coordinator veto over analysis tool outages) as it was a specific recommendation from the 2003 Blackout report. This requirement was revised and moved into IRO-001-2 as R6.

Stakeholders indicated that R6 (previously IRO-002 R2) is a “binary” requirement and the Lower VSL was deleted and the Severe VSL was revised based on those comments.

Retirement of IRO-005-1

Several commenters had concerns around removing the requirement to monitor frequency (IRO-005-1 R8). The intent of this monitoring activity was incorporated into IRO-002-2, R1. Other commenters had concerns with the removal of other monitoring requirements in the standard. While the Standard Drafting Team (SDT) recognizes the concern raised, the SDT is even more concerned with the subjectivity associated with any attempt to measure “Monitoring.” It is the SDT’s contention that adherence to reliability standards that require the said monitoring cannot be demonstrated unless the entity is closely monitoring the system parameters. Furthermore, the SDT contends that any requirements that describe the monitoring facilities needed to fulfill fundamental duties should be embedded in entity certification process requirements. With IRO-014 and IRO-001 R1 in place, the actual act of monitoring is a secondary task that is inherent in responding to situations or events that could have an adverse impact on reliability.

Requirements, Measures and Violation Severity Levels in IRO-014-2

Several commenters expressed concerns with the term “impacted” and suggested replacing this with “other”. The RC SDT believes “impacted” directly relates to the purpose statement. Additionally, replacing “one or more other” with “impacted” does tighten the requirement and removes ambiguity. The RC SDT does not intend for non-contiguous Reliability Coordinators to have “Reliability Coordinator Agreements”, but to have Procedures, Processes, or Plans with impacted reliability coordinators. Other commenters suggested striking the term “as a minimum” in R1 and the RC SDT agrees and has modified R1 accordingly. Some commenters did not agree with the wording of the new requirements in IRO-014 that were formerly in IRO-016. The RC SDT reviewed the Implementation Plan for IRO-016 and its requirements and made some revisions to the requirements listed in IRO-014-2. There are now 4 requirements:

- R5. Each Reliability Coordinator, upon identification of an Adverse Reliability Impact, shall notify impacted Reliability Coordinators. [Violation Risk Factor: Medium] [Time Horizon: Operations Planning, Same Day Operations and Real-time Operations]
- R6. Each impacted Reliability Coordinator shall operate as though the problem exists when the identified Adverse Reliability Impact cannot be agreed to by the impacted Reliability Coordinators. [Violation Risk Factor: Medium] [Time Horizon: Operations Planning, Same Day Operations and Real-time Operations]
- R7. The Reliability Coordinator with the identified Adverse Reliability Impact shall develop a mitigation plan when the impacted Reliability Coordinators can not agree that the problem exists. [Violation Risk Factor: Medium][Time Horizon: Operations Planning, Same Day Operations and Real-time Operations]
- R8. Each impacted Reliability Coordinator shall implement the mitigation plan developed by the Reliability Coordinator that has the identified Adverse Reliability Impact when the

impacted Reliability Coordinators can not agree on a mitigation plan, [Violation Risk Factor: Medium][Time Horizon: Operations Planning, Same Day Operations and Real-time Operations]

Several commenters suggested that the High and Severe VSLs for R2 contradicted the requirement. The RC SDT agreed and removed the “nots” from the VSLs. Several commenters had suggested revisions for the VSLs for R6. This requirement was imported from IRO-016 and several commenters suggested expanding the set of requirements regarding the mitigation plan. New VSLs were developed for these requirements.

Retirement of IRO-015-2

Stakeholders agreed with the proposed revisions and this is not being re-posted for comment.

Requirements of IRO-016-1

Stakeholders agreed with the concept of moving the requirements of IRO-016-1 into IRO-014-2. Some commenters did not agree with the wording of the new requirements in IRO-014 that were formerly in IRO-016 and the RC SDT revised these requirements in support of stakeholder comments. There are now 4 requirements, rather than 2, that address Reliability Coordinator actions when a Reliability Coordinator identifies an Adverse Reliability Impact. New measures and VSLs were developed to support these revised requirements.

Proposed Effective Dates

The RC SDT received comments that COM-001-2, R5 should have an effective date immediately upon regulatory approval. The RC SDT agrees and will request an effective date that is the first possible effective date – the first day of the first calendar quarter following applicable regulatory approval – or in those jurisdictions where no regulatory approval is required, the first day of the first calendar quarter following Board of Trustees adoption.

The Reliability Coordination Drafting Team would like to receive industry comments on these changes. The RC SDT asks that you review the revised standards and answer the following questions by August 9, 2009.

1. Do you agree with the revisions made to the Requirements in COM-001-2 as shown in the posted Standard? If not, please explain in the comment area.

- Yes
 No

Comments: The MRO NSRS does not believe a mitigation plan is necessary in R1. If the interpersonal communication capability fails during the quarterly test, the entity simply needs to fix it, document the fix and re-test. A mitigation plan is unnecessary and will only delay repairing the interpersonal communication capability as it would have to be completed first before fixing the system. Please create a definition for the interpersonal communication capability (or systems) term used in the response to comments to draft 1 in the summary of consideration for question 1.

In R2, MRO NSRS assumes that the 30 minutes or longer in parenthesis is intended to describe the length of the outage. MRO NSRS thinks this would be clearer if the requirement were revised to: "Each Reliability Coordinator, Transmission Operator and Balancing Authority shall notify impacted entities within 60 minutes of the detection of a failure of its normal interpersonal communications capabilities lasting longer than 30 minutes."

R3 is not necessary as it would be impossible to meet many other requirements if a common language such as English was not used. This requirement results in the waste of compliance resources managing and auditing documentation associated with it.

2. Do you agree with the revisions made to the Measures in COM-001-2 as shown in the posted Standard? If not, please explain in the comment area.

- Yes
 No

Comments: Conforming changes are required to the Measures based on the suggested modifications to the requirements in question 1.

3. Do you agree with the revisions made to the Violation Severity Levels in COM-001-2 as shown in the posted Standard? If not, please explain in the comment area.

- Yes
 No

Comments: Conforming changes are required to the VSLs based on the suggested modifications to the requirements in question 1. In addition, the MRO NSRS suggests since R2 has a time component in the requirement four VSLs could be written based on the timeliness of the notification. This would be consistent with the FERC's expressed desire in the June 2008 order on VSLs in which they stated that as many VSLs should be developed as possible.

4. Do you agree with the revisions made to the Requirements in COM-002-3 as shown in the posted Standard? If not, please explain in the comment area.

- Yes
 No

Comments: The MRO NSRS largely agrees with the changes to the requirements and believes it goes a long way towards resolving the issue NERC has created recently with

interpreting operating instructions as directives. This makes it clear that only directives that are required for operating emergencies require three way communication. MRO NSRS believes that the SDT could further support resolution to this directive issue by developing a definition for directive. MRO NSRS proposes the following definition:

Directive or Reliability Directive – A verbal communication by a Reliability Coordinator, Transmission Operator, or Balancing Authority that requires action by the recipient to prevent or mitigate an Adverse Reliability Impact.

In requirement 1, MRO NSRS does believe that another word than “require” should be used. Consider using “request”. An RC, BA, and TOP can’t force the recipient of the directive to repeat it back. They can ask or request it be repeated back though.

5. Do you agree with the revisions made to the Measures in COM-002-3 as shown in the posted Standard? If not, please explain in the comment area.

Yes

No

Comments: MRO NSRS largely agrees with the measures with the exception that a conforming change needs to be made to M1 if the suggestion regarding “require” in Q4 is accepted.

6. Do you agree with the revisions made to the Violation Severity Levels in COM-002-3 as shown in the posted Standard? If not, please explain in the comment area.

Yes

No

Comments: If the suggestion regarding “require” in Q4 is accepted, conforming changes to the VSL need to be made. Additionally, MRO NSRS believes the Moderate and Severe VSLs are confusing based on repeating the language exactly in the requirement. In most cases, repeating the language of the requirement is best but we believe a deviation is warranted here. The intent of Moderate appears to be that the RC, TOP or BA did not acknowledge the repeat of the directive was correct and the repeat was correct. In the Severe, MRO NSRS believes the intent appears to be that the RC, TOP or BA did not acknowledge the repeat of the directive was correct but the repeat was incorrect. MRO NSRS agrees that these distinctions make sense but offer the following changes to clarify the intent.

Moderate VSL: The responsible entity issued a verbal directive associated with real-time operating emergency conditions and the recipient repeated the intent of the directive correctly, but the responsible entity did not acknowledge the recipient was correct.

Severe VSL: The responsible entity issued a verbal directive associated with real-time operating emergency conditions and the recipient repeated the intent of the directive incorrectly, but the responsible entity failed to repeat the intent of the original statement to resolve any misunderstandings.

7. Do you agree with the revisions to the definition of Adverse Reliability Impacts (IRO-001-2)? If not, please explain in the comment area.

Yes

No

Comments:

8. Do you agree with the revisions to the Requirements in IRO-001-2 as shown in the posted Standard? If not, please explain in the comment area.

- Yes
 No

Comments: MRO NSRS agrees with many of the changes. However, we believe R5 is not necessary for reliability. MRO NSRS agrees the RC should notify impacted entities when the transmission problem has been mitigated; however, if the RC fails to notify the impacted entities, it will not result in an Adverse Reliability Impact. Thus, it is not necessary as a sanctionable requirement.

9. Do you agree with the revisions to the Measures in IRO-001-2 as shown in the posted Standard? If not, please explain in the comment area.

- Yes
 No

Comments: Measurement 5 needs to be struck if R5 is struck per question 8.

10. Do you agree with the revisions to the Violation Severity Levels in IRO-001-2 as shown in the posted Standard? If not, please explain in the comment area.

- Yes
 No

Comments: The Commission stated in their order on VSLs in June of 2008 their preference for as many VSLs as possible. MRO NSRS believes two VSLs are possible for R1 based on whether the RC is acting or directing actions to prevent versus mitigate. Failure to mitigate should be Severe. Failure to prevent should be High because if the RC fails to act or direct action to prevent, the Adverse Reliability Impact may still not happen if system conditions change.

For the Moderate VSL of R2, please remove the clause "but not all". It is not necessary.

11. Do you agree with the revisions to the Requirements in IRO-014-2 as shown in the posted Standard? If not, please explain in the comment area.

- Yes
 No

Comments: In bullet 2.1 of Requirement R2, what does the requirement that all RCs that are required to take action must agree to it really mean? Does this mean that if the RCs don't agree that in reality an Operating Procedure, Process or Plan doesn't really exist and thus is not subject to R2? Further, how can one RC require another RC to agree with an Operating Procedure, Process or Plan? Either they agree or they don't. Isn't what is really needed is a requirement for the impacted RC to review and acknowledge the plan? That is give it a thumbs up or a thumbs down?

In requirement R4, the clause "at least weekly" should be struck. If the RCs agree that a bi-weekly call is sufficient unless conditions change significantly why must they be held to a weekly standard. Our experience has been that most RCs participate in daily calls anyway based on an agreed need.

Please strike IRO-014-2 R7 as it is redundant with IRO-001-2 R1. IRO-001-2 R1 already requires that RC with the identified Adverse Reliability Impact to act or direct actions to prevent or mitigate the magnitude or duration of the event.

MRO NSRS does not believe IRO-014-2 R8, yet properly considers why the RCs may not agree on a mitigation plan. If RC A develops a mitigation plan for an identified Adverse Reliability Impact on their system and RC B does not agree with RC A's mitigation plan, RC B will be in violation of R8 if they do not follow the mitigation plan. What if the mitigation plan has an Adverse Reliability Impact on RC B's footprint? They should not have to follow the mitigation plan.

12. Do you agree with the revisions to the Measures in IRO-014-2 as shown in the posted Standard? If not, please explain in the comment area.

- Yes
 No

Comments: Conforming changes to the Measurements will be required for accepted changes from question 11.

13. Do you agree with the revisions to the Violation Severity Levels in IRO-014-2 as shown in the posted Standard? If not, please explain in the comment area.

- Yes
 No

Comments: In the Commission's June 2008 order on VSLs, they expressed their preference for having as many VSLs as possible. The MRO NSRS believes that four VSLs could be written for R4 based on the number of conference calls that are participated in. We also believe this would be consistent with the Commission's guideline 4 because the requirement is written in the plural, that is conference calls, so all conference calls must be considered in aggregate. Thus, failure to participate in more than one conference call does not represent distinct violations but a single violation.

Four VSLs should be written for R5 based on the number of RCs notified. Furthermore, the current Severe VSL is redundant with the Moderate VSL. Failure to notify one RC meets both VSL since Severe uses the word any.

14. If you have any other comments, not expressed in questions above, for the RC SDT on any of the other changes made to this set of standards and their associated implementation plans, please provide them here.

Comments: