

Unofficial Comment Form for the 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 located at the link below 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 **December 18, 2010**.

http://www.nerc.com/filez/standards/Project2009-22_RFI_COM-002-2_R2_IRC.html

If you have questions please contact Howard Gugel by email at howard.gugel@nerc.net or by telephone at 609-651-2269.

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 has been posted for a 30-day informal comment period. A list of drafting team members has been posted in the “Related Files” section of the project page.

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.

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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:

The NSRS believes that the sentence "Routine operating instructions can be directives," should be struck. There is nothing in the standard that supports this statement. They included the statement because the question was asked. They should have answered the question that the standard does not address it.

We also recommend changing "during a real-time emergency" to "to prevent or resolve a real-time emergency".