

## Unofficial Comment Form for Reliability Coordination – Project 2006-06

Please **DO NOT** use this form. Please use the [electronic comment form](#) 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 **February 3, 2010**. If you have questions please contact Stephen Crutchfield at [stephen.crutchfield@nerc.net](mailto:stephen.crutchfield@nerc.net) or by telephone at 609-651-9455.

[http://www.nerc.com/filez/standards/Reliability\\_Coordination\\_Project\\_2006-6.html](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).

**1. Do you agree with the proposed definition of Interpersonal Communication (COM-001-2)? If not, please explain in the comment area.**

- Yes  
 No

Comments: In previous postings, the drafting team confirmed that they intended for COM-001-2 to apply only to verbal communication systems. We believe this definition had inadvertently brought data back into the standard. Specifically, we are concerned about "or exchange information." Data can be considered information and thus some may now interpret SCADA and ICCP being included. To avoid this confusion, we suggest the definition would be sufficient with the "or exchange information" redacted.

We believe the proposed definition for the term "Interpersonal Communication" is too broad and ambiguous. We recommend the following instead: "Verbal Communication between two or more registered entities (not within the same organization) to exchange reliability-related information." The inclusion of this term "registered entities" removes the ambiguity which we believe is contained in the proposed definition. In addition, the inclusion of the phrase "not within the same organization" clarifies that the focus of definition is to address communication between different registered entities.

This should be communication between to registered entities and not within entities.

**2. Do you agree with the proposed definition of Alternative Interpersonal Communication (COM-001-2)? If not, please explain in the comment area.**

- Yes  
 No

Comments: Please clarify.

We believe the proposed definition for the term "Interpersonal Communication" is too broad and ambiguous. We recommend the following instead: "Verbal Communication between two or more registered entities (not within the same organization) to exchange reliability-related information." The inclusion of this term "registered entities" removes the ambiguity which we believe is contained in the proposed definition. In addition, the inclusion of the phrase "not within the same organization" clarifies that the focus of definition is to address communication between different registered entities.

**3. Do you agree with the revisions made to Requirement 1 in COM-001-2 as shown in the posted Standard and Implementation Plan? If not, please explain in the comment area.**

- Yes  
 No

Comments: We mostly agree with the revisions and thank the drafting team for modifying the requirement to remove the need for a mitigation plan per our comments from the last posting. However, we do believe that introduction of a requirement to fix the Alternate Interpersonal Communication within 60 minutes could be a compliance problem. Our issue is with the time requirement. For example, our stakeholders have experienced situations with certain communications systems in which a part had to be shipped overnight to fix the communication system. While we still don't believe a mitigation plan is necessary in this case, we are concerned that ordering the part may not be viewed as taking action. Please confirm that SDT believes that the 60 minutes applies to beginning to repair the Alternative Interpersonal Communication and not to full restoration of the Alternative Interpersonal Communication. Further, please confirm that identification of a substitute Alternative Interpersonal Communication could simply

mean relying on an already existing and identified secondary or tertiary Alternative Interpersonal Communication?

Similar to our concern identified in Q1, we are concerned about the clause “used for communicating real-time operating information.” We believe data could be drawn into the requirement with this clause. Redacting the clause from the requirement will clarify that the requirement applies to only verbal communications.

**4. Do you agree with the definition of Reliability Directive (COM-002-2)? If not, please explain in the comment area.**

Yes

No

Comments: The combination of the COM-002-3 standard and the definition of Reliability directive do not clearly specify that the communication is verbal and between only two responsible entities. Otherwise, the communication could be considered a blast call, written correspondence or conversation between operators within the same responsible entity. We believe that the Reliability Directive definition should be: “A verbal communication initiated by a Reliability Coordinator, Transmission Operator, or Balancing Authority to another registered entity where action by the recipient is necessary to address an actual or expected emergency and the RC, TOP or BA operator clearly identifies in the communication that this is a Reliability Directive.”

**5. Do you agree with the revisions to the Requirements in COM-002-3 as shown in the posted Standard and Implementation Plan? If not, please explain in the comment area.**

Yes

No

Comments: We agree with most of this standard and the apparent intent. However, there are some specific issues. For instance, measurement of compliance to R1 could be challenging. As the VSL is written, it would appear the compliance auditor could judge if a Reliability Directive should have been issued. The VSL language that is problematic is “The responsible entity that required actions to be executed”. Who determines that actions were required? One could argue that failure to identify a communication as a Reliability Directive means that actions weren’t required but it is doubtful the compliance authorities would take this approach. Thus, there would appear to be great judgment left to the compliance auditor in determining if a Reliability Directive should have been issued.

The combination of the COM-002-3 standard and the definition of Reliability directive do not clearly specify that the communication is verbal and between only two responsible entities. Otherwise, the communication could be considered a blast call, written correspondence or conversation between operators within the same responsible entity. We have offered proposed modifications to the definition of Reliability Directive in Q5 to solve this issue. Alternatively, the issue could be addressed by modifying the requirements.

The VSLs for R3 appear to have some redundancy. The Severe VSL and the second condition in the High VSL appear to be similar or the same.

**6. Do you agree with the use of the defined term “Reliability Directive” in revisions to the Requirements in IRO-001-2 as shown in the posted Standard and Implementation Plan? If not, please explain in the comment area.**

Yes

No

Comments: We largely agree with the use of the Reliability Directive term but have some suggested some refinements in the previous questions to the definition and requirements.

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

Yes

No

Comments: R2 appropriately requires the RC experiencing the Adverse Reliability Impact to distribute its Operating Procedure, Process or Plan to other RCs required to take action. However, it inappropriately places the burden on the same RC to obtain the agreement of impacted RCs. No RC can be forced to agree. Rather R2 should remove the bullet to require agreement from the impacted RC and a new requirement should be written to require the impacted RC to acknowledge the Operating Procedure, Process or Plan with agreement or disagreement. In the event of disagreement, a reliability or legal reason or failure to implement comparable actions should be given as the reason for not agreeing with the Operating Process, Procedure or Plan. This contributes to reliability by forcing the impacted RC to take action if the action is reasonable.

There is an extra "or" in the R8 clause: "unless such actions would violate safety, equipment, or regulatory or statutory requirements".

IRO-014-2 R2 VSLs differentiate violations based on whether the plans, processes, and procedures were distributed or agreed to. How can another RC agree to them if it has not received them?

Because it is unlikely that an RC will make notifications without exchanging reliability information or vice versa for IRO-014-2 R3, we suggest a more appropriate delineation for the VSLs would be based on the number of other impacted RCs that were not informed.

IRO-014-2 R4 VSLs should be defined based upon the number of conference calls the RC does not participate in. R4 requires each RC to participate in "agreed upon conference calls". Because the statement "conference calls" is plural, VSLs need to be set based on the aggregate of calls not participated in. Failure to assign VSLs in this way is equivalent to setting the requirement to "agreed upon conference call" and causes the VSLs to be in violation guideline 3 that the Commission established in their June 2008 Order on VSLs. Guideline 3 states that the VSL must be consistent with the requirement and cannot "redefine or undermine the requirement". Clearly, these VSLs do.

R5's Severe VSL is redundant with the Moderate VSL. Failure to notify one RC meets both VSLs since Severe uses the word any. Based on the SDT's response to our comment from the last time, we believe instead of any they mean "no impacted". Unfortunately, "any impacted" could be one or two or higher. If it is one, it matches the Moderate VSL.

The VSL for R8 needs to include the "unless such actions would violate safety, equipment, regulatory or statutory requirement" clause.

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

## Unofficial Comment Form — Reliability Coordination Project 2006-6

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Comments: This standard could be boiled down to one requirement and that is to maintain the continuous ability to communicate with other appropriate registered entities regardless of the need for a backup system.

For IRO-001-2 R1, "act" should be removed. The RC can't act but can only issue Reliability Directives per the functional model.

IRO-001-2 R4 and R5 Severe VSLs need to have "any or" removed. The VSL should only apply for three or more and "any or" conflicts with this.

COM-001-2 R2 Severe VSL conflicts with other VSLs. Specifically, the use of the word "any" in the Severe VSL is problematic. Notifying one entity at 65 minutes fits both the Lower VSL and Severe VSL as well. We suggest deleting the first portion of the Severe VSL that reads, "The responsible entity failed to notify any impacted entities of the failure of its normal Interpersonal Communications capabilities within 60 minutes."

COM-001-2 R2 needs to be coordinated with EOP-008-1 since EOP-008-1 R1.5 is requiring 2 hours. COM-001-2 R1 should be clarified to remove 60 minutes. Perhaps the specific time frame is too administrative and too dependent on the circumstances and doesn't purport to directly impact reliability of the backup functionality. If a time frame is desired perhaps the registered entity which knows their backup functionality capabilities and their plan to actuate these capabilities could be the best entity to define a reasonable immediate time frame.

The NERC BOT recently approved the pursuing the Results/Performance Based standards development activity. Based on this recent decision, we believe the BOT has signaled their intent to remove administrative types of requirements from all standards. The IRO-001-2 R6 for the RC to have the authority to veto outages of their analysis tools and the COM-001-2 R3 requirement to use the English language are clearly not result or performance based but rather administrative. If an operator used Portuguese to issue a Reliability Directive they will not be able to satisfy three-part communications in COM-002-3 in addition to many other standards and requirements they could not comply with. Even if an RC has veto authority over analysis tools, failure to exercise it would render the authority meaningless. Furthermore, the RC would not be able to meet a host of other requirements and standards such as operating within IROL because they would not be able to assess the system appropriately.