

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.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region (check all Regions in which your company operates)		Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

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~~thod~~ 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:

A. R5.5 states a BA shall have Interpersonal Communications with each Interchange Coordinator within its BA area and adjacent Interchange Coordinators. NERC Registry Criteria (v5) uses the term “Interchange Authority” not Interchange Coordinator, please clarify.

B. Upon review of the NERC Compliance Registry, there are only 56 BA’s that are also registered as an IA but 138 total BA’s within the registry. R5.5 is not clearly written because many BA’s do not have an IA within their BA area. Though a BA will use an IA to schedule interchange, a possible rewrite of R5.5 may be “Each Interchange Authority that the BA actively uses to arrange Interchange”.

C. R10 states that the RC, TOP, BA, DP and GOP shall notify “impacted entities” within 60 minutes... Please clarify if the SDT means the entities within the applicability section or is this to be determined by the entity. A possible rewrite may be; “Each RC shall notify TOP’s, BA’s, and IA’s within its RC area along with adjacent RC’s within the same Interconnection”. This break down would need to be required for each affected entity and would provide clarity to the industry.

D. We do not agree with a DP and GOP need to be held to the same level of compliance as a RC, BA or TOP. FERC Order 693 (paragraph 487) directed the DP and GOP to be included in this standard by stating: “ We expect the telecommunication requirements for all applicable entities will vary according to their roles and that these requirements will be developed under the Reliability Standards development process”. A DP and GOP may not be staffed 24 hours a day like a BA or TOP and the SDT did not take this into consideration.

E. We understand that the DP and GOP need a means of communicating with their BA and TOP (R7 and R8) but would this not be the same Interpersonal Communications capability that as stated in R3 and R5 for the TOP and BA? Example: If the BA uses a phone line as their Interpersonal Communication medium to contact the DP wouldn't the DP also use the same medium to communicate with their BA? Yes, there could be different mediums but 99% of the time it will be the same medium.

F. R10 could mean that if there is a logging system that detects an Interpersonal Communication failure, then all applicable entities will need to monitor that monitoring device. Since this requirement applies to all applicable entities, and Interpersonal Communication mediums will most likely be the same, there will always be two entities found non compliant if the 60 minute threshold is passed.

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:

A. Agree that a receiving entity should not be held accountable until such time that they are required to take such action.

B. It might 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. This needs to be coordinated 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:

A. R1, As written it is unclear what level of certification this will entail? Presently written within the NERC Reliability Standards, responsibility is given to RC's to manage the reliability of their areas. Recommend deleting this requirement. The ERO has pushed back in other Standards to having a responsibility for any NERC Requirements, since they are not a user, owner, or operator of the BES (see EOP-004-2). If this does move forward and an RC is certified by the ERO and then the RC is found non-compliant by a Regional Entity, for an associated certified item, will the ERO be held responsible, too?

If the SDT selects to keep R1, there are some issues with how the requirement is written. The requirement places emphasis on regions and regional boundaries when no emphasis should be placed there. There are multiple Reliability Coordinators the span multiple regions. The language "to continuously assess transmission reliability" should be changed to "to continuously assess Bulk Electric System reliability" to reflect on what the standards are enforceable. The requirement on the ERO should also be

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expanded similar to BAL-005-0.1b R1 to ensure that all operating entities and the entire BES is covered under a Reliability Coordinator.

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

C. 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:

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

Comments:

A. COM-002-3, R2 As stated in FERC Order 693, section 512, it is essential that RCs, BA's and TOP's have communications with DPs. R2 also applies to TSPs, LSEs and PSEs. There is no directive for this and it is going to be almost impossible to communicate with a DP since DPs are usually not operated 24 hours per day as like a RC, TOP, or BA. Many DPs have answering services that will relay a message once they receive it and then pass it along to someone. An answering company could repeat the directive word for word but this will not add to any reliability level. The SDT should reconsider the applicability section of this Standard to only apply to a RC, TOP and BA for the issuance of a Reliability Directive. BA's should have the responsibility to have an Interpersonal Communication medium with DPs in their BA area per COM-001-2.

B. IRO-002-2, R1, Recommend that “System Operators” be replaced with “system operators” since NERC has defined System Operator to be an individual at a control center (BA, TOP, GOP, or RC). The lower cased system operator will only point to the RC system operator that will have this R1 authority.

C. The SDT did not address all of our 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 the as the Transmission Operator or Balancing Authority. We believe that 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, we believe that standards should be made clear that the Reliability Directive is directed to another company.

D. We also are concerned about the need to conduct three-part communications for a Reliability Directive issued through a blast call. Under these circumstances, the need for immediate action of multiple parties may require a blast call and there may not be time for all parties to complete three-part communications before initiating actions. Thus, we believe blast calls should be treated separately and that should be made clear.

E. COM-002-3 R2 needs to be rewritten as it is too verbose. The point is for the recipient of the original message to get the issuer to confirm that the message was understood. We suggest rewording R2 to "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 Reliability Directive issued per Requirement R1, shall repeat, restate, rephrase or recapitulate the Reliability Directive." Once the receiver has completed this requirement, the ball is in the issuer's court per Requirement R3. No additional words are necessary in the requirement.

F. Per COM-002-3 R1, who decides that actions need to be issued as a Reliability Directive? Shouldn't it be the responsible entity? Thus, can we assume that if the responsible entity does not identify a communication as a Reliability Directive that it is not a Reliability Directive per the requirement? After all, why would an entity require actions but not issue a Reliability Directive. Following this logic, the VSL for R1 would never apply. Would a compliance auditor second guess if an action required a Reliability Directive?

G. 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.

H. 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 indicates requirements are being move to this standard. Please delete the text box.

I. Please strike part 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.

J. IRO-014-2 R4 is overly broad and would require Reliability Coordinators that will not impact one another to participate on conference calls with one another without any reliability benefit. The issue is created by the addition of the clause “within the same Interconnection” to the requirement. ISO-NE, FRCC, Midwest ISO, and SPP are all in the same Interconnection. It is hard to fathom there being reliability benefit to SPP and ISO-NE conversing weekly or Midwest ISO and FRCC conversing weekly. We suggest limiting the requirement to adjacent Reliability Coordinators.

K. For IRO-014-2 R5, we suggest replacing “other” with “impacted” to limit the notification of Adverse Reliability Impacts to only those Reliability Coordinators that need to know. Because the definition of Adverse Reliability Impact includes “Bulk Electric System instability or Cascading”, it is possible that the cascading of 138 kV lines serving a load pocket or generator outlet stability issues could require a Reliability Coordinator to notify all other Reliability Coordinators regardless of impact. This would include Reliability Coordinators outside of the Interconnection with the problem. It would also include Reliability Coordinators that are not impacted. For instance, an issue in New England that would not pose a threat outside the northeast would require ISO-NE to notify SPP and FRCC and Reliability Coordinators in the Western Interconnection. There is no reliability benefit to this notification.

L. IRO-014-2 R6-R8 are problematic and need to be refined to make clear that the Reliability Coordinators shall operate to the most conservative limit. It should not require a Reliability Coordinator that disagrees with an action plan to implement the action plan. The Reliability Coordinator will be disagreeing with the action plan for a reliability reasons. Assuming they are correct, the requirement to implement said action plan will actually put the Interconnection at greater risk. These requirements inappropriately attempt to codify the debate and analysis that occurs between and within Reliability Coordinators when there are differing results in reliability analysis. This is part of the problem with having a Wide Area view that results in Reliability Coordinators having a view into other Reliability Coordinator Area. Their results and conclusions may be different. There should be a hierarchical structure for whose results should be used. It should be the Reliability Coordinator with primary responsibility unless the other Reliability Coordinator has evidence to demonstrate that the Reliability Coordinator with primary responsibility is incorrect. What this should do is, to trigger both to review their models and data to assess the problem. None of this needs to be codified in the standards though.

M. In the definition of Reliability Directive, we suggest changing “to address an Emergency” to “to address a declared Emergency”. This would help limit second guessing for a situation where a System Operator took action because he truly believed he was in an Emergency but after the fact analysis demonstrates there really was not an Emergency.

N. The drafting team should expand its rationale for deleting IRO-002-1 R3. Currently, TOP-005 R1 is referenced. The project 2007-03 (“Real-Time Operations SDT”) proposed to retire TOP-005-2 R1 in its most recent posting.

O. We disagree with deleting IRO-002-1 R5 and R7 which establishes tools and monitoring capabilities. There should be basic tool requirements established for Reliability Coordinators. The project 2009-02 (“Real-time Reliability Monitoring and Analysis Capabilities”) will be addressing these issues in more detail. Thus, it does not make sense to delete these requirements until that drafting team completes its task.