

NERC

NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION

Project 2015-07 (COM-001-3)

Internal Communications Capabilities

John Gunter, Chair
Industry Webinar
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RELIABILITY | ACCOUNTABILITY



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- Background
- FERC Order No. 808 Directives
- Standard Drafting Team
- Changes
 - Addition of Requirements R12 and R13
 - Proposed VRF/VSLs
 - Review of Evidence Retention Requirements
- Implementation Plan
- Next Steps
- Q&A

- COM-001 establishes Interpersonal Communication capabilities for applicable entities.
- Interpersonal Communications are defined in the NERC Glossary of Terms as “Any medium that allows two more individuals to interact, consult, or exchange information”.
- In the NOPR for COM-001-2, the Commission asked for comments on whether COM-001-2 should be modified to address internal communication capabilities.
- COM-001-2 was approved in FERC Order No. 808, which was issued April 16, 2015.

- In FERC Order No. 808, the Commission directed NERC to address the following:
 - Address “internal communications capabilities to the extent that such communications could involve the issuance or receipt of Operating Instructions or other communications that could have an impact on reliability.” Order No. 808, at P 1.
 - Address “internal telecommunications (or other internal communication systems)...between geographically separate control centers within the same functional entity.” Order No. 808, at P 41.
 - FERC highlighted, for example, it was concerned the standard did not:
 - Address “internal telecommunications (or other internal communication systems)...between a control center and field personnel.” *Id.*
 - Address “[t]he adequacy of internal communications capability whenever internal communications could directly affect the reliable operation of the Bulk-Power System.” *Id.*

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- The Standard Drafting Team (SDT) reviewed SAR comments and began to draft COM-001-3 standard.
- The SDT developed the following documents:
 - COM-001-3 Standard
 - Implementation Plan and Mapping Document
 - VRF/VSL Justification
 - Standards Authorization Request (SAR) Comment Responses

- COM-001-3 is a modified version of COM-001-2
 - Proposed Requirement R12 addresses Reliability Coordinator, Balancing Authority, Generator Operator, and Transmission Operator responsibilities.
 - Proposed Requirement R13 addresses Distribution Provider responsibilities.
 - Two separate requirements were necessary to address different VRFs based on the risks associated with different functional registrations.
 - Capabilities are not limited but encompass any medium that allows two or more individuals to interact, consult, or exchange information as stated in the NERC Glossary of Terms.

- R12: Each Reliability Coordinator, Transmission Operator, Generator Operator, and Balancing Authority shall have internal Interpersonal Communication capabilities for the exchange of information that is necessary for the reliable operation of the BES. [Violation Risk Factor: High] [Time Horizon: Real-time Operations]
- M12: Each Reliability Coordinator, Transmission Operator, Generator Operator, and Balancing Authority shall have and provide upon request evidence that it has internal Interpersonal Communication capability, which could include, but is not limited to:
 - physical assets, or
 - dated evidence, such as, equipment specifications and installation documentation, operating procedures, test records, operator logs, voice recordings, transcripts of voice recordings, or electronic communications.
 - Examples include, but are not limited to, between geographically separate control centers within the same functional entity, or between a control center and field switching personnel.

- R13: Each Distribution Provider shall have internal Interpersonal Communication capabilities for the exchange of information that is necessary for the reliable operation of the BES. [Violation Risk Factor: Medium] [Time Horizon: Real-time Operations]
- M13: Each Distribution Provider shall have and provide upon request evidence that it has internal Interpersonal Communication capability, which could include, but is not limited to:
 - physical assets, or
 - dated evidence, such as, equipment specifications and installation documentation, operating procedures, test records, operator logs, voice recordings, transcripts of voice recordings, or electronic communications.
 - Examples include, but are not limited to, between geographically separate control centers within the same functional entity, or between a control center and field switching personnel.

- With the new Risk-Based Compliance model, evidence retention is being reviewed to avoid placing an undue burden on industry.
- Issues being reviewed include:
 - What is the burden on Industry?
 - Will evidence for the time period demonstrate reliability?
- Options being discussed include:
 - No change from existing COM-001-2
 - Establishing a default evidence retention period
 - Evidence retention period for different registrations

- Proposed COM-001-3:
 - Where approval by an applicable governmental authority is required, the standard shall become effective on the first day of the first calendar quarter that is 6 months after the effective date of the applicable governmental authority's order approving the standard, or as otherwise provided for by the applicable governmental authority.
 - Where approval by an applicable governmental authority is not required, the standard shall become effective on the first day of the first calendar quarter that is 6 months after the date the standard is adopted by the NERC Board of Trustees, or as otherwise provided for in that jurisdiction.
- Retirement of COM-001-2:
 - 11:59:59 p.m. on the day immediately prior to the Effective Date of COM-001-3 in the particular jurisdiction in which the COM-001-3 standard is becoming effective.

- Presented to Standards Committee (SC) on September 23, 2015 and authorized to post for initial comments and ballot.
- Initial 45-day comment period and 10-day ballot posted September 25, 2015.
- Next SDT meeting is scheduled for December 1 and 2, 2015.
- If the proposed standard passes and there are no substantive revisions to the initial ballot, the standard will be posted for a 10-day final ballot and presented at the February 2016 NERC Board of Trustees Meeting.



Questions and Answers

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