

Consideration of Comments on Reliability Coordination — Project 2006-06

The Reliability Coordination Standard Drafting Team (RC SDT) thanks all commenters who submitted comments proposed revisions to the standards for Project 2006-06: Reliability Coordination. These standards were posted for a 30-day public comment period from July 10, 2009 through August 9, 2009. The stakeholders were asked to provide feedback on the standards through a special Electronic Comment Form. There were 31 sets of comments, including comments from more than 87 different people from over 62 companies representing 8 of the 10 Industry Segments as shown in the table on the following pages.

All comments received have been reformatted so that all comments received in response to the first question appear following the first question, etc. All comments have been posted at the following site:

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

Changes to Requirements, Measures and Violation Severity Levels in COM-001-2: Stakeholders suggested that there is a need to define Interpersonal Communications for this standard. The RC SDT is proposing the following definitions:

Interpersonal Communication: Any method that allows two or more individuals to interact, consult, or exchange information.

Alternative Interpersonal Communication: Any method 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.

Other stakeholders suggested edits to the requirements. The RC SDT revised the wording of R2 to add clarity and revised R3 to include the phrase “unless dictated by law...” to address legal requirements in some areas.

Several stakeholders suggested removing the mitigation plan from R1 and M1. The RC SDT agreed and made revisions to other measures to reflect changes to the requirements.

Stakeholders suggested adding more VSLs for R2. The RC SDT agreed and drafted additional VSLs reflecting timing and the number of entities notified. Other changes to the VSLs were made based on revisions to the requirements.

Stakeholders suggested removing the Distribution Provider and Generator Operator from the Data Retention section for R1 of COM-001. Since these are not applicable entities in R1, they were removed from Data Retention for the requirement.

The standard and the proposed definitions will be posted for an additional comment period.

Changes to Requirements, Measures and Violation Severity Levels in COM-002-3 Stakeholder consensus has been achieved with respect to the retirement of R1 and M1 from the last approved version of the standard. In response to the majority of the comments, the drafting team has modified and rearranged the order of the remaining requirements, and coined a definition for “Reliability Directive”. The drafting team is also coordinating with the RTO SDT (Project 2007-03) and the OPCP SDT (Project 2007-02) on the definition and usage of the term “Reliability Directive”.

Reliability Directive: A communication initiated by a Reliability Coordinator, Transmission Operator or Balancing Authority where action by the recipient is necessary to address an actual or expected Emergency.

As a reference, we have included the existing definition of Emergency:

Emergency: Any abnormal system condition that requires automatic or immediate manual action to prevent or limit the failure of transmission facilities or generation supply that could adversely affect the reliability of the Bulk Electric System.

In accord with the majority of commenters, the drafting team made changes to the Measures to bring them into conformance with the adopted suggestions from question 4 for improving the Requirements.

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

Stakeholders generally agreed with the revisions to the requirements. Several stakeholders suggested adding the words “an issued” before “directive” in R3. The RC SDT agreed and made the change. No further revisions were made to the requirements. The proposed revisions to the definition of Adverse Reliability Impacts is being posted for comment.

Stakeholders agreed with the measures for IRO-001-2. The measure M3 was revised to reflect the revision to R3. No other revisions were suggested for the measures.

The VLS for R3 was revised to add the word “issued” before directive to match the revised requirement. Stakeholders suggested minor revisions to the VSLs for R4 and R5. The RC SDT agreed and made the revisions.

The RC SDT believes that stakeholder consensus has been achieved on IRO-001-2. The definition of Adverse Reliability Impacts is included in this posting for comment.

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

Stakeholders suggested revising R8 to include provisions for avoiding implementing actions that would violate safety, equipment or regulatory or statutory requirements. The RC SDT agreed and added this to the requirement. Other stakeholders suggested adding “For conditions or activities that impact other Reliability Coordinator Areas,...” at the beginning of R1 and R3. The RC SDT agreed and added this to the requirements. The Time Horizons for R2 were revised as suggested to “Same Day Operations and Operations Planning”. Several stakeholders expressed concerns regarding having R6-R8 as separate requirements. The intent of R6, R7, and R8 is to handle those things that arise that may not have had a plan identified in advance. The RC SDT contends the requirements should be separate requirements as they identify distinctly different actions and are adequate as written.

Stakeholders agreed with the Measures, except to make conforming changes for revisions to the requirements. The RC SDT has revised the measures based on the new requirements. One stakeholder suggested revision to the Data Retention for R5-R8. Data Retention was revised for R5 to 12 months, however the RC SDT believes that three years is the correct period for R6-R8.

Several stakeholders suggested developing four VSLs for R5. Typically, in the course of BES operations, the number of impacted Reliability Coordinators will be a small number. The SDT effort in this regard was to write the VSLs to represent both the large and small

scenarios containing an Adverse Reliability Impact. The essence of the severe VSL is that the RC did not notify any (as in no one) impacted RC's. As such, it should be severe. The essence of the moderate VSL is that the RC notified one other RC, however did not notify the remaining impacted RC's. The SDT felt the VSL's appropriately addressed the large and small scenarios. Other stakeholders suggested four VSLs for R4. The essence of R4 is written to require impacted RC's to talk at least weekly and is singular in nature. VSL's can not be written for conference calls that exceed the singular requirement.

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Vice President and Director of Standards, Gerry Adamski, at 609-452-8060 or at gerry.adamski@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

¹ The appeals process is in the Reliability Standards Development Procedures:
<http://www.nerc.com/standards/newstandardsprocess.html>.

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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.....88

Consideration of Comments on Project 2006-06 Reliability Coordination

The Industry Segments are:

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

		Commenter	Organization	Industry Segment										
				1	2	3	4	5	6	7	8	9	10	
1.	Group	Russell A. Noble	Northwest LSE Group			X								
		Additional Member	Additional Organization	Region Segment Selection										
		1. Rick Paschall	Pacific Northwest Generating Cooperative	WECC 3										
2.	Group	Guy Zito	Northeast Power Coordinating Council											X
		Additional Member	Additional Organization	Region Segment Selection										
		1. Ralph Rufrano	New York Power Authority	NPCC 5										
		2. Alan Adamson	New York State Reliability Council, LLC	NPCC 10										
		3. Paul Kiernan	New York Independent System Operator	NPCC 2										
		4. Roger Champagne	Hydro-Quebec TransEnergie	NPCC 2										
		5. Kurtis Chong	Independent Electric System Operator	NPCC 2										
		6. Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC 1										
		7. Edward Dahill	National Grid	NPCC 1										
		8. Bohdan M. Dackow	US Power Generating Company (USPG)	NPCC NA										
		9. Chris de Graffenried	Consolidated Edison Co. of New York	NPCC 1										
		10. Brian D. Evans-Mongeon	Utility Services	NPCC 8										

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	Commenter	Organization	Industry Segment																	
			1	2	3	4	5	6	7	8	9	10								
11.	Mike Garton	Dominion Resources Services, Inc.	NPCC	5																
12.	Brian L. Gooder	Ontario Power Generation Incorporated	NPCC	5																
13.	Kathleen Goodman	ISO - New England	NPCC	2																
14.	David Kiguel	Hydro One Networks Inc.	NPCC	1																
15.	Michael R. Lombardi	Northeast Utilities	NPCC	1																
16.	Randy MacDonald	New Brunswick System Operator	NPCC	2																
17.	Greg Mason	Dynegy Generation	NPCC	5																
18.	Bruce Metruck	New York Power Authority	NPCC	6																
19.	Chris Orzel	FPL/NextEra Energy	NPCC	5																
20.	Robert Pellegrini	The United Illuminating Company	NPCC	1																
21.	Michael Schiavone	National Grid	NPCC	1																
22.	Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3																
23.	Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10																
24.	Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10																
25.	Gregory Campoli	New York Independent System Operator	NPCC	2																
3.	Group	Jim Case	SERC OC Standards Review Group	X			X													
	Additional Member	Additional Organization	Region	Segment Selection																
1.	Jack Kerr	Dominion Virginia Power	SERC	1, 3																
2.	Steve Fritz	ACES Power Marketing	SERC	6																
3.	Joel Wise	Tennessee Valley Authority	SERC	1, 3, 5, 9																
4.	Hugh Francis	Southern Co.	SERC	1, 3, 5																
5.	Alan Jones	Alcoa Power Generation	SERC	1, 5																
6.	Scott McGough	Oglethorpe Power Corporation	SERC	5																
7.	Keith Steinmetz	E.ON US Services	SERC	1, 3, 5																
8.	Mike Hardy	Southern Co.	SERC	1, 3, 5																
9.	Steve McElhane	South Mississippi Electric Membership Corp.	SERC	1, 3, 5																
10.	Gary Hutson	South Mississippi Electric Membership Corp.	SERC	1, 3, 5																
11.	John Rembold	Southern Illinois Power Cooperative	SERC	1, 3, 5																

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12.	Timmy LeJeune	Louisiana Generating, LLC	SERC	1, 3, 5										
13.	Wayne Pourciau	Georgia System Operations Corp.	SERC	3										
14.	Tim Hattaway	PowerSouth Energy Cooperative	SERC	1, 3, 5										
15.	Tony Halcomb	Cogentrix Energy, LLC	SERC	5, 6										
16.	Robert Thomasson	Big Rivers Electric Cooperative	SERC	1, 3, 5										
17.	Wes Davis	SERC Reliability Corp.	SERC	10										
18.	John Troha	SERC Reliability Corp.	SERC	10										
4.	Group	Denise Koehn	Bonneville Power Administration		X		X		X	X				
Additional Member Additional Organization Region Segment Selection														
1.	Steven Davis	Generation Support	WECC	1										
5.	Group	Sam Ciccone	FirstEnergy		X		X	X	X	X				
Additional Member Additional Organization Region Segment Selection														
1.	Dave Folk	FE	RFC											
2.	Doug Hohlbaugh	FE	RFC											
3.	John Martinez	FE	RFC											
4.	Kevin Querry	FE	RFC											
6.	Group	Ben Li	IRC Standards Review Committee			X								
Additional Member Additional Organization Region Segment Selection														
1.	Patrick Brown	PJM	RFC	2										
2.	James Castle	NYISO	NPCC	2										
3.	Anita Lee	AESO	WECC	2										
4.	Bill Phillips	MISO	MRO	2										
5.	Steve Myers	ERCOT	ERCOT	2										
6.	Lourdes Estrada-Saliner	CAISO	WECC	2										
7.	Charles Yeung	SPP	SPP	2										
8.	Matt Goldberg	ISO-NE	NPCC	2										

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7.	Group	Jason L. Marshall	Midwest ISO Standards Collaborators		X									
Additional Member Additional Organization Region Segment Selection														
1.	Joe Knight	Great River Energy	MRO	1										
2.	Bob Thomas	IMEA	SERC	4										
3.	Barb Kedrowski	We Energies	RFC	3, 4, 5										
4.	Jim Cyrulewski	JDRJC Associates	RFC	8										
8.	Individual	Steve Alexanderson	Central Lincoln			X								
9.	Individual	Virginia Cook	JEA	X		X		X						
10.	Individual	Daniel Duff	Liberty Electric Power LLC					X						
11.	Individual	Mike Davis	WECC Reliability Coordinator											X
12.	Individual	Sandra Shaffer	PacifiCorp	X		X		X	X					
13.	Individual	Brent Hebert	Calpine Corporation					X	X					
14.	Individual	Brandy A. Dunn	Western Area Power Administration	X					X					
15.	Individual	Hugh Francis	Southern Company	X		X		X						
16.	Individual	Rao Somayajula	ReliabilityFirst Corporation											X
17.	Individual	James H. Sorrels, Jr.	American Electric Power	X		X		X	X					
18.	Individual	Brent Ingebrigtsen	E.ON U.S.	X		X		X	X					
19.	Individual	Kasia Mihalchuk	Manitoba Hydro	X		X		X	X					
20.	Individual	Troy Willis	Georgia Transmission Corporation	X										

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21.	Individual	Bob Thomas	Illinois Municipal Electric Agency				X							
22.	Individual	Chris Scanlon	Exelon	X		X		X	X					
23.	Individual	Roger Champagne	Hydro-Québec TransEnergie (HQT)	X										
24.	Individual	Scott Berry	Indiana Municipal Power Agency				X							
25.	Individual	Greg Rowland	Duke Energy	X		X		X	X					
26.	Individual	Jianmei Chai	Consumers Energy Company			X	X	X						
27.	Individual	Michael R. Lombardi	Northeast Utilities	X		X		X						
28.	Individual	Dan Rochester	Independent Electricity System Operator		X									
29.	Group	Carol Gerou	MRO NSRS											
30.	Individual	Alice Murdock	Xcel Energy											
31.	Individual	Jason Shaver	American Transmission Company	X										

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.

Summary Consideration: Most stakeholders agreed with the requirements in COM-001. Stakeholders suggested that there is a need to define Interpersonal Communications for this standard. The RC SDT is proposing the following definitions:

Interpersonal Communication: Any method that allows two or more individuals to interact, consult, or exchange information.

Alternative Interpersonal Communication: Any method 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.

Other stakeholders suggested edits to the requirements. The RC SDT revised the wording of R2 to add clarity, revised R3 to include the phrase “unless dictated by law...” to address legal requirements in some areas, and removed references to the mitigation plan in R1.

Organization	Yes or No	Question 1 Comment
Central Lincoln		<p>Comments: The inclusion of load serving entities and distribution providers does not address any present reliability gap. R4 is extremely vague, and is not likely to be interpreted consistently. What form of evidence will be acceptable? Photos of telephones?</p>
<p>Response: The RC SDT thanks you for your comment. The LSE and DP were added as applicable entities to R3 as a result of stakeholder comments during the previous posting. The DP and GOP were added as applicable entities in R4 per FERC Order 693 directives. The Measure M4 for Requirement R4 was revised to:</p> <p>M4. Each Distribution Provider and Generator Operator shall have and provide upon request evidence that could include, but is not limited to operator logs, voice recordings or transcripts of voice recordings, electronic communications, or equivalent that it had Interpersonal Communications capabilities with its Transmission Operator and Balancing Authority for the exchange of Interconnection and operating information. (R4.)</p>		
JEA		<p>R2 I would suggest that R2 be clarified so that it is understood that the 60 minutes starts at the beginning of the outage (or the end of the 30 minute period, if that was instead the intent) so that there can be no confusion about when the clock starts for notification periods. Otherwise, the wording of these standards is clearer than the current version.</p> <p>R4 I am concerned that with the word "capabilities" that the DP/GO's will be expected by the auditors to demonstrate that its "capability" was working every single second of every day since their last audit, especially since you have not included a data retention period (especially since this is rated a "high" VRF).</p>

Organization	Yes or No	Question 1 Comment
<p>Response: The RC SDT thanks you for your comment.</p> <p>R2: We have revised the wording to clarify the intent:</p> <p>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 that lasts 30 minutes or longer. <i>[Violation Risk Factor: Medium][Time Horizon: Real-time Operations]</i></p> <p>R4: The Measure 4 for Requirement R4 was revised to:</p> <p>M4. Each Distribution Provider and Generator Operator shall have and provide upon request evidence that could include, but is not limited to operator logs, voice recordings or transcripts of voice recordings, electronic communications, or equivalent that it had Interpersonal Communications capabilities with its Transmission Operator and Balancing Authority for the exchange of Interconnection and operating information. (R4.)</p> <p>Data retention for R4, M4 was added to the revised standard.</p>		
Northwest LSE Group	No	<p>The RC STD has done a commendable effort. However, it is questionable how expanding the applicability to include LSEs, DPs, & PSEs that are non-scheduling/tagging entities will increase reliability of the BES. In fact, we believe that increasing the applicability could do just the opposite. Many of these entities that are only registered as a LSE, DP, and/or PSE do not have a 24/7 desk/dispatch facility to receive RC/BA/TOP reliability directives, and are too small (10s of MW) to effectively assist during a reliability crisis. In addition, the Regional Entities (WECC in this case) are overwhelmed as it is, asking them to take on even more audit responsibilities is unrealistic, and not worth the effort.</p> <p>In addition, for the small Registered Entity, what would constitute compliance with R3 & R4 if no TOP/BA real-time directives were received? Everyone employed speaks English and there is at least one phone on the premises? Will the small DP and/or LSE be required to monitor its communication system 24/7 with competent personnel for an unlikely TOP/BA directive?</p>
<p>Response: The RC SDT thanks you for your comment. The LSE, DP and PSE were added as applicable entities to R3 as suggested by other stakeholders in the last posting. The Distribution Provider and Generator Operator are in R4 per FERC Order 693 directives.</p> <p>The measures for the requirements specify what would constitute evidence needed to demonstrate compliance. Note that R3 and R4 are not focused solely on communication related to “directives.” Requirement R3 is focused on all “. . . inter-entity Bulk Electric System (BES) reliability communications . . . “ The drafting team feels that R4 as written allows flexibility to the entities in meeting the performance requirement. Note that R4 only applies to Distribution Providers and Generator Operators, not to LSEs.</p>		
American Transmission Company	No	<p>We believe that the team needs to define the term “interpersonal communications capabilities”. It’s our understanding that the term refers to how entities will communicate (i.e. phone, cell phone, video conferencing, email or satellite phone) with each other, but that is not being clearly communicated by the requirement. A clear definition of the term “interpersonal communication capabilities” will likely provide needed clarity to the requirement.</p>

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Organization	Yes or No	Question 1 Comment
		<p>Requirement 1 seems to imply that an entity will be judge based on a single test of its alternative communication system within any given quarter, and if that test fails they must develop a mitigation plan. Our concern is that the requirement should allow for multiple testing and only if all or a reoccurring issue is found should you document and fix the issue. (Example: An entity performs weekly tests of its alternative communication system. One of the test’s fails. All other tests, following the failed test, are successful. Would the entity have to develop a mitigation plan based on the one failure, or are the other successful tests sufficient to show compliance?)</p> <p>In R2, we assume that the 30 minutes or longer in parenthesis is intended to describe the length of the outage. To clarify, we suggest that the language be changed to: Each RC, TOP and BA shall notify impacted entities within 60 minutes of the detection of a failure of its normal interpersonal communication systems lasting longer than 30 minutes.</p>
<p>Response: The RC SDT thanks you for your comment. Several stakeholders have expressed a concern with the definition of interpersonal communications capabilities. The RC SDT concurs and has drafted a definition that will be posted for comment.</p> <p>R1: Other stakeholders also expressed concern with developing a mitigation plan in this requirement. The RC SDT has revised the requirement to:</p> <p>R1. Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall identify and test, on a quarterly basis, its Alternative Interpersonal Communications capability used for communicating real-time operating information. If the test is unsuccessful, the entity shall take action within 60 minutes to restore the identified alternative or identify a substitute Alternative Interpersonal Communications capability. <i>[Violation Risk Factor: High][Time Horizon: Real-time Operations]</i></p> <p>The RC SDT feels that this will address your comment.</p> <p>R2: We concur and have revised the requirement as you suggest.</p>		
Northeast Power Coordinating Council	No	<p>Interpersonal communication includes more than voice, such as instant messaging, text messaging and email. This Standard needs a definition of interpersonal communication.</p> <p>Having alternative interpersonal communications should be specified as a requirement.</p> <p>Work communication within Québec must be in French according to the law. It is understood and agreed that communication outside Québec with adjacent entities would be, and in fact is already, in English. Accordingly, R3 should be modified as the proposition below: R3. Unless dictated by law or otherwise agreed to,</p>
<p>Response: The RC SDT thanks you for your comment. The RC SDT agrees that there is a need for a definition of Interpersonal Communications Capability. We have developed a draft definition that will be posted for comment which meets the FERC Order 693 directive to:</p> <p>Includes adequate flexibility for compliance with the reliability standard, adoption of new technologies and cost-effective solutions.</p> <p>The RC SDT agrees with your comment regarding the alternate interpersonal communications capability and has revised the requirement to read:</p> <p>R1. Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall identify and test, on a quarterly basis, its Alternative Interpersonal</p>		

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Organization	Yes or No	Question 1 Comment
<p>Communications capability used for communicating real-time operating information. If the test is unsuccessful, the entity shall take action within 60 minutes to restore the identified alternative or identify a substitute Alternative Interpersonal Communications capability. <i>[Violation Risk Factor: High][Time Horizon: Real-time Operations]</i></p> <p>We concur with your suggestion regarding R3 and have made the suggested revision.</p>		
SERC OC Standards Review Group	No	The STD should clarify what types of communications are considered in the standard is it voice or data communications or both?
<p>Response: The RC SDT thanks you for your comment. Interpersonal communication does not include data (see IRO-010-1) and includes more than voice, such as instant messaging, text messaging and email. The RC SDT has developed a draft definition of interpersonal communications capabilities that will be posted for comment which meets the FERC Order 693 directive to:</p> <p>Includes adequate flexibility for compliance with the reliability standard, adoption of new technologies and cost-effective solutions.</p>		
IRC Standards Review Committee	No	<p>(1) We do 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. If repairing the system would be a lengthy process, then a mitigation plan may be developed to document that the entity is in process to fix the system. There is no associated requirement to have an alternate interpersonal communication capability along with R1 to test it. Thus, if a responsible entity did not have an alternate interpersonal communication capability, R1, in essence, does not apply. We suggest adding a requirement to have an alternate interpersonal communication capability to address this gap. Alternatively, the requirement to have an alternate interpersonal communication capability along with requirements to test and fix it could be stipulated in the Organization Certification Requirements.</p> <p>(2) In R2, we assume that the 30 minutes or longer in parenthesis is intended to describe the length of the outage. We think 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."</p> <p>(3) R3 is not necessary. This requirement results in the waste of compliance resources managing and auditing documentation associated with it with no measurable improvement to reliability.</p>
<p>Response: The RC SDT thanks you for your comment. 1) The RC SDT agrees with your comment regarding the mitigation plan and the requirement for alternate interpersonal communications capability and has revised the requirement to read:</p> <p>R1. Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall identify and test, on a quarterly basis, its Alternative Interpersonal Communications capability used for communicating real-time operating information. If the test is unsuccessful, the entity shall take action within 60 minutes to</p>		

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Organization	Yes or No	Question 1 Comment
		<p>restore the identified alternative or identify a substitute Alternative Interpersonal Communications capability. <i>[Violation Risk Factor: High][Time Horizon: Real-time Operations]</i></p> <p>2) We concur with your comment and have revised the requirement accordingly.</p> <p>3) The RC SDT does not agree with your assertion regarding R3. There is a reliability need to speak a common language, especially in issuing and receiving directives. There are several areas of the continent where this could be a reliability gap if there is no requirement.</p>
Midwest ISO Standards Collaborators	No	<p>We do 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.</p> <p>In R2, we assume that the 30 minutes or longer in parenthesis is intended to describe the length of the outage. We think 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."</p> <p>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.</p>
		<p>Response: The RC SDT thanks you for your comment. 1) The RC SDT agrees with your comment regarding the mitigation plan and the requirement for alternate interpersonal communications capability and has revised the requirement to read:</p> <p>R1. Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall identify and test, on a quarterly basis, its Alternative Interpersonal Communications capability used for communicating real-time operating information. If the test is unsuccessful, the entity shall take action within 60 minutes to restore the identified alternative or identify a substitute Alternative Interpersonal Communications capability. <i>[Violation Risk Factor: High][Time Horizon: Real-time Operations]</i></p> <p>2) We concur with your comment and have revised the requirement accordingly.</p> <p>3) The RC SDT does not agree with your assertion regarding R3. There is a reliability need to speak a common language, especially in issuing and receiving directives. There are several areas of the continent where this could be a reliability gap if there is no requirement.</p>
ReliabilityFirst Corporation	No	FERC 693 excludes distribution providers if they are not a user, owner or operator of BES. This should be reflected in R4 of the standard
		<p>Response: The RC SDT thanks you for your comment. FERC Order 693 endorses the NERC Statement of Compliance Registry criteria (paragraph 512) and also adopted the proposal to require the ERO to modify COM-001 to apply to distribution providers and generator operators (paragraph 493).</p>

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Organization	Yes or No	Question 1 Comment
E.ON U.S.	No	<p>E.ON U.S. suggests deleting “interpersonal” from the term “interpersonal communications capabilities”. The need for and meaning of the term “interpersonal” isn’t clear. Does it infer communications must be to/from a specific individual rather than to/from another reliability entity? Verbal vs electronic communications? All non-data communications? E.ON U.S. believes that the term “interpersonal” must be clarified if it is to remain in the standard.</p> <p>In the proposed R1 “how extensive must the quarterly testing be “ establish contact or verify all functions? Does the term “alternative” include the "normal" communication medium or only the “backup” mediums? Does the alternative imply ALL possible communication alternatives? E.ON U.S. suggests replacing the term “alternative” with “planned backup” or similar. Quarterly testing needs to be limited to only established/planned backup communication methods not any potential "alternative" communication method.</p>
<p>Response: The RC SDT thanks you for your comment. The RC SDT agrees with several stakeholders that there is a need for a definition of Interpersonal Communications Capability. We have developed a draft definition that will be posted for comment which meets the FERC Order 693 directive to:</p> <p>Includes adequate flexibility for compliance with the reliability standard, adoption of new technologies and cost-effective solutions.</p> <p>The testing requirement is to ensure that the alternative (not “normal”) interpersonal communications capability works as a minimum. Entities may go above and beyond the requirement if they desire. The requirement was edited to identify the alternative and test it.</p> <p>R1. Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall identify and test, on a quarterly basis, its alternative Interpersonal Communication capability used for communicating real-time operating information. If the test is unsuccessful, the entity shall take action within 60 minutes to restore the identified alternative or identify a substitute Alternative Interpersonal Communications capability. <i>[Violation Risk Factor: Lower][Time Horizon: Real-time Operations]</i></p>		
Manitoba Hydro	No	<p>do 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 as it would delay repairing the interpersonal communication capability.</p> <p>R2 assumed that the 30 minutes or longer in parenthesis is intended to describe the length of the outage. We think 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?</p> <p>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.</p>
<p>Response: The RC SDT thanks you for your comment. 1) The RC SDT agrees with your comment regarding the mitigation plan and the requirement</p>		

Consideration of Comments on Project 2006-06 Reliability Coordination

Organization	Yes or No	Question 1 Comment
<p>for alternate interpersonal communications capability and has revised the requirement to read:</p> <p>R1. Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall identify and test, on a quarterly basis, its Alternative Interpersonal Communications capability used for communicating real-time operating information. If the test is unsuccessful, the entity shall take action within 60 minutes to restore the identified alternative or identify a substitute Alternative Interpersonal Communications capability. <i>[Violation Risk Factor: High][Time Horizon: Real-time Operations]</i></p> <p>2) We concur with your comment and have revised the requirement accordingly.</p> <p>3) The RC SDT does not agree with your assertion regarding R3. There is a reliability need to speak a common language, especially in issuing and receiving directives. There are several areas of the continent where this could be a reliability gap if there is no requirement.</p>		
Georgia Transmission Corporation	No	<p>Per the NERC Reliability Standards Development Procedure, under the definition of a Reliability Standard? The obligations or requirements must be material to reliability and measurable? With regards to R3. - It goes without saying that inter-entity BES reliability communications must be in a common language between the entities for understanding operation instructions. From an audit/measurability standpoint, the evidence to the requirement would not converge to a finite amount of material. The amount of evidence required to demonstrate compliance of this requirement would be a huge administrative burden. It seems this concept (for use of the English language) could be captured under the "Entity Tasks and Interrelationships" section of the NERC Reliability Functional Model which defines the set of functions that must be performed to ensure the reliability of the bulk electric system. It also explains the relationship between and among the entities responsible for performing the tasks within each function. Additionally, this concept (for use of the English language) could further be explained under each applicable registration type (BA, GOP, TSP, LSE, PSE, and DP) in the NERC Reliability Functional Model. The Second option for R3 is to remove the Requirement from the continent wide Standards and have the effected entities/regions create a "Regional Standard" where entities involved in inter-entity BES reliability communications have a history of language barrier concerns.</p> <p>As a separate issue to R3, it also seems conflicting that a written requirement would provide the option of "Unless agreed to otherwise". This option described in the language of the requirement implies that it is not a requirement but an option which further supports the suggestions above.</p>
<p>Response: The RC SDT thanks you for your comment. The RC SDT does not agree with your assertion regarding R3. There is a reliability need to speak a common language, especially in issuing and receiving directives. There are several areas of the continent where this could be a reliability gap if there is no requirement. The Reliability Functional Model is not an enforceable standard.</p>		
Illinois Municipal Electric Agency	No	<p>The IMEA supports comments submitted by the MISO Standards Collaboration Group indicating R3 is not necessary. Similarly, IMEA questions the necessity of R4. Therefore, we question the need to expand the applicability of COM-001 to DP, LSE, and PSE since R3 and R4 are the only two Requirements applicable to those functions.</p>

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Organization	Yes or No	Question 1 Comment
<p>Response: The RC SDT thanks you for your comment. The RC SDT does not agree with your assertion regarding R3. There is a reliability need to speak a common language, especially in issuing and receiving directives. There are several areas of the continent where this could be a reliability gap if there is no requirement. R4 is included per FERC Order 693 directive.</p>		
Exelon	No	<p>Agree with the revisions with the following exception/recommendation: COM-001: purpose is to address communication facilities / capabilities (technical/hardware). COM-002: purpose is to address effectiveness (protocols).COM-001: R.1-3 address telecommunication facility requirements. R4 requires English use. Recommend the drafting team move COM-001 R4 (use English) to COM-002 where effectiveness of communications (protocols) between entities is addressed.</p>
<p>Response: The RC SDT thanks you for your comment. COM-001 Requirement R3 (English use) is being incorporated into COM-003-1 by the Operations Personnel Communications Protocols SDT (Project 2007-02). It will be retired from this standard upon approval of COM-003-1. We see no benefit to moving it to COM-002 at this time.</p>		
Hydro-Québec TransEnergie (HQT)	No	<p>Interpersonal communication includes more than voice, such as instant messaging, text messaging and email. This Standard needs a definition of interpersonal communication.</p> <p>Having alternative interpersonal communications should be specified as a requirement since there is actually no requirement to have that alternative way of communication in the first place.</p> <p>Work communication within Québec must be in French according to the law. It is understood and agreed that communication outside Québec with adjacent entities would be, and is in fact already, in English. Accordingly, R3 should be modified as the proposition below: R3. Unless determined by law or otherwise agreed to,</p>
<p>Response: The RC SDT thanks you for your comment. The RC SDT agrees that there is a need for a definition of Interpersonal Communications Capability. We have developed a draft definition that will be posted for comment which meets the FERC Order 693 directive to:</p> <p>Includes adequate flexibility for compliance with the reliability standard, adoption of new technologies and cost-effective solutions.</p> <p>The RC SDT agrees with your comment regarding the alternate interpersonal communications capability and has revised the requirement to read:</p> <p>R1. Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall identify and test, on a quarterly basis, its Alternative Interpersonal Communications capability used for communicating real-time operating information. If the test is unsuccessful, the entity shall take action within 60 minutes to restore the identified alternative or identify a substitute Alternative Interpersonal Communications capability. <i>[Violation Risk Factor: High][Time Horizon: Real-time Operations]</i></p> <p>We concur with your suggestion regarding R3 and have made the suggested revision.</p>		
Duke Energy	No	<p>R1 requires an entity to “develop a mitigation plan” if a test of alternative communications capabilities is unsuccessful. We believe that this phrase should be changed to “take action”, reflecting that an entity’s response to an unsuccessful test may</p>

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Organization	Yes or No	Question 1 Comment
		<p>be to simply call or email a repair order. The phrase “develop a mitigation plan” implies that an entity must establish a backup to the alternative communications capabilities rather than just restore the alternative communications capabilities.</p>
<p>Response: The RC SDT thanks you for your comment. We concur with your comment regarding the mitigation plan and have revised the requirement to:</p> <p>R1. Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall identify and test, on a quarterly basis, its alternative Interpersonal Communication capability used for communicating real-time operating information. If the test is unsuccessful, the entity shall take action within 60 minutes to restore the identified alternative or identify a substitute Alternative Interpersonal Communications capability. <i>[Violation Risk Factor: Lower][Time Horizon: Real-time Operations]</i></p>		
Northeast Utilities	No	<p>It is understood that the use of the term "interpersonal communications" and "interpersonal communications capabilities" were selected by the RC SDT to better reflect the intent of the Standard. However, NU reviewers are concerned over the new terminology and believe that it is unclear and not universally accepted to mean the same thing to all parties. NU's belief is that the original use of the terms "telecommunications" and "telecommunications facilities" are clearer and universally understood. NU recommends that the original terms be re-instated or the term "interpersonal communications" be replaced to reflect the intent of the Standard is to ensure "voice and text equipment" is adequate for communicating real-time operating information.</p> <p>R1 ? the requirement has evolved to test alternative equipment, versus a requirement to have primary and alternative equipment. Standard should require entities to have the equipment such as in the -1 version.R2 is to notify impacted entities in the event of a loss of normal communications. With backup communications operating correctly do we assume there is no impact and therefore notification is not required? This is unclear from a compliance perspective and unnecessary if backup communications are available. Alternative communications often go several layers deep including cell phones, satellite phones, radio, etc.</p>
<p>Response: The RC SDT thanks you for your comment. Several stakeholders have expressed a concern about the definition of interpersonal communications. The RC SDT is proposing a definition that will be posted for comment to address those concerns as well as your comment.</p> <p>R1: The intent of the requirement is as you suggest. This requirement has been revised to:</p> <p>R1. Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall identify and test, on a quarterly basis, its Alternative Interpersonal Communications capability used for communicating real-time operating information. If the test is unsuccessful, the entity shall take action within 60 minutes to restore the identified alternative or identify a substitute Alternative Interpersonal Communications capability. <i>[Violation Risk Factor: High][Time Horizon: Real-time Operations]</i></p> <p>Notification of a failure of the normal interpersonal communications is still required by R2. The testing requirement is for one designated alternative. No notification is required for the failure of a non-designated alternative.</p>		

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Organization	Yes or No	Question 1 Comment
Independent Electricity System Operator	No	<p>We suggest the SDT review the applicability to Transmission Service Providers, Load-Serving Entities and Purchasing Entities from a real time operating perspective. We do not believe they are active participants in real time operation for which they require to have the same communication capability as the RCs, TOPs, BAs and DPs.</p> <p>Interpersonal communication includes more than voice, such as instant messaging, text messaging and email. This Standard needs a definition of interpersonal communication.</p> <p>Having alternative interpersonal communications should also be specified as a requirement.</p> <p>Work communication within Quebec must be in French according to the law. It is understood and agreed that communication outside Québec with adjacent entities would be, and already is, in English. Accordingly, R3 should be modified as proposed below: R3. Unless dictated by law or otherwise agreed to,</p> <p>R4: We believe “Interconnection” should be replaced by “interconnection” since the former is not a defined term.</p>
<p>Response: The RC SDT thanks you for your comment. TSP, LSE and PSE are not required to have the same Interpersonal communication as RC, TOP or BA. The only requirement applicable to TSP, LSE and PSE is R3 (English language).</p> <p>The RC SDT agrees that there is a need for a definition of Interpersonal Communications Capability. We have developed a draft definition that will be posted for comment which meets the FERC Order 693 directive to:</p> <p>Includes adequate flexibility for compliance with the reliability standard, adoption of new technologies and cost-effective solutions.</p> <p>The RC SDT agrees with your comment regarding the alternate interpersonal communications capability and has revised the requirement to read:</p> <p>R1. Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall identify and test, on a quarterly basis, its Alternative Interpersonal Communications capability used for communicating real-time operating information. If the test is unsuccessful, the entity shall take action within 60 minutes to restore the identified alternative or identify a substitute Alternative Interpersonal Communications capability. <i>[Violation Risk Factor: High][Time Horizon: Real-time Operations]</i></p> <p>We concur with your suggestion regarding R3 and have made the suggested revision.</p> <p>R4: Interconnection is a defined term in the NERC Glossary of Terms (Updated on April 20, 2009).</p>		
MRO NSRS	No	<p>(1) 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.</p> <p>(2) 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,</p>

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Organization	Yes or No	Question 1 Comment
		<p>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.”</p> <p>(3) 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.</p>
<p>Response: The RC SDT thanks you for your comment. 1) The RC SDT agrees with your comment regarding the mitigation plan and the requirement for alternate interpersonal communications capability and has revised the requirement to read:</p> <p>R1. Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall identify and test, on a quarterly basis, its Alternative Interpersonal Communications capability used for communicating real-time operating information. If the test is unsuccessful, the entity shall take action within 60 minutes to restore the identified alternative or identify a substitute Alternative Interpersonal Communications capability. <i>[Violation Risk Factor: High][Time Horizon: Real-time Operations]</i></p> <p>The team has drafted a definition for both the term “Interpersonal Communication” and the term, “Alternative Interpersonal Communication.”</p> <p>2) We concur with your comment and have revised the requirement accordingly.</p> <p>3) The RC SDT does not agree with your assertion regarding R3. There is a reliability need to speak a common language, especially in issuing and receiving directives. There are several areas of the continent where this could be a reliability gap if there is no requirement.</p>		
Xcel Energy	No	<p>(1) While an improvement from the terminology used in version 1, the term "interpersonal communications" is still vague. We feel the intent of the drafting team was to include non-verbal communication as well, like email. However, as drafted, this point is not clear. We feel a definition is needed in order avoid disparity in its interpretation.</p> <p>(2) It appears that the requirement for RCs, TOPs and BAs to have communication capabilities (whether primary or backup/alternative) was removed from the standard. Yet, R1 requires the RC, TOP and BA to test alternative communications capabilities. Requirements to have primary and backup/alternative communication capabilities should be explicitly stated.</p> <p>(3) Additionally, we feel that the DP and GOP should have testing requirements for their communication capabilities with their TOP and BA.</p>
<p>Response: The RC SDT thanks you for your comment. 1) The RC SDT agrees that there is a need for a definition of Interpersonal Communications Capability. We have developed a draft definition that will be posted for comment which meets the FERC Order 693 directive to:</p> <p>Includes adequate flexibility for compliance with the reliability standard, adoption of new technologies and cost-effective solutions.</p> <p>2) The RC SDT does not agree with your assertion regarding R1. The requirement for alternate interpersonal communications capability implies that primary interpersonal communications are in place.</p>		

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Organization	Yes or No	Question 1 Comment
<p>3) The DP and GOP were added as applicable entities in R4 per FERC Order 693 directives. The RC SDT does not agree with your assertion regarding the need for testing requirements. However, your concerns may be addressed in the Measure 4 revision:</p>		
<p>M4. Each Distribution Provider and Generator Operator shall have and provide upon request evidence that could include, but is not limited to operator logs, voice recordings or transcripts of voice recordings, electronic communications, or equivalent that it had Interpersonal Communications capabilities with its Transmission Operator and Balancing Authority for the exchange of Interconnection and operating information. (R4.)</p>		
Western Area Power Administration	Yes	R4 should say "Generator Operator" rather than "Generation Operator"
<p>Response: The RC SDT thanks you for your comment. We have made this revision.</p>		
American Electric Power	Yes	AEP does generally agree with the revisions, but the use of the term "interpersonal communication capabilities" needs a NERC-approved definition. Otherwise, what is in scope? Are e-mail or text messages acceptable, and, if so, what type of guaranteed delivery is necessary?
<p>Response: The RC SDT thanks you for your comment. The RC SDT agrees that there is a need for a definition of Interpersonal Communications Capability. We have developed a draft definition that will be posted for comment which meets the FERC Order 693 directive to:</p> <p>Includes adequate flexibility for compliance with the reliability standard, adoption of new technologies and cost-effective solutions.</p>		
FirstEnergy	Yes	We agree with many of the changes made to the standard including the change of title to reflect communications (voice and text messages). The parenthesis around 30 minutes or longer should be removed as parenthesis by definition mean a word, phrase, or sentence inserted in a passage to explain or modify the thought. This phrase is more than an explanation of the term failure. It sets forth a time requirement that is an integral part of R1. We suggest rewording the requirement as "Each RC, TOP, and BA shall notify impacted entities within 60 minutes of a failure of its normal interpersonal communications capabilities that lasts 30 minutes or longer."
<p>Response: The RC SDT thanks you for your comment. We concur with your comment and have revised the requirement accordingly.</p>		
Bonneville Power Administration	Yes	
PacifiCorp	Yes	
Southern Company	Yes	

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Organization	Yes or No	Question 1 Comment
Calpine Corporation	Yes	

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.

Summary Consideration: Most commenters agreed with the measures for COM-001. The measures were revised based on revisions to the requirements as well as comments received below. Several stakeholders suggested removing the mitigation plan from R1 and M1. The RC SDT agreed and made the revision. M3 and M4 were revised as:

M3. Each Reliability Coordinator, Transmission Operator, Balancing Authority, Generator Operator, Transmission Service Provider, Load-Serving Entity, Purchasing-Selling Entity, and Distribution Provider shall have and provide upon request evidence that could include, but is not limited to operator logs, voice recordings or transcripts of voice recordings, electronic communications, or equivalent, that will be used to determine that its personnel used English as the language for all inter-entity BES reliability communications between and among operating personnel responsible for the real-time generation control or operation of the interconnected BES. If a language other than English is used, each party shall have and provide upon request evidence that could include, but is not limited to operator logs, voice recordings or transcripts of voice recordings, electronic communications, or equivalent, of agreement to use the alternate language or the law that requires the use of an alternate language. (R3.)

M4. Each Distribution Provider and Generator Operator shall have and provide upon request evidence that could include, but is not limited to operator logs, voice recordings or transcripts of voice recordings, electronic communications, or equivalent that it had Interpersonal Communications capabilities with its Transmission Operator and Balancing Authority for the exchange of Interconnection and operating information (R4).

Organization	Yes or No	Question 2 Comment
Northwest LSE Group	No	To demonstrate compliance the small Registered Entities will be in the position of proving a negative: i.e., there is no real-time BES operational communication from or to any other entity. Currently, for the smaller entities, communication with the Transmission Operator or Balancing Authority is strictly for operational safety and local reliability of service, not operational reliability for the BES as defined by NERC. It is not clear how the small entity will show compliance. If R4 requires the small load-only DP and/or LSE to have 24/7 monitoring of its phone, and contracted answering service is unable to contact anyone, will this be a violation?
<p>Response: The RC SDT thanks you for your comment. R4 is applicable only to registered Distribution Providers and Generator Operators. The RC SDT has revised the measure to prevent having to prove a negative:</p> <p>M4. Each Distribution Provider and Generator Operator shall have and provide upon request evidence that could include, but is not limited to operator logs, voice recordings or transcripts of voice recordings, electronic communications, or equivalent that it had Interpersonal Communications capabilities with its Transmission Operator and Balancing Authority for the exchange of Interconnection and operating information</p>		

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Organization	Yes or No	Question 2 Comment
<p>There is no 24/7 monitoring requirement in R4.</p>		
<p>Northeast Power Coordinating Council</p>	<p>No</p>	<p>See our comment for R3 in Q1. Accordingly, M3 should be modified as the proposition below: M3. “ that will be used to determine that personnel used English “or another language” as the language for all inter-entity Bulk Electric System reliability communications between and among operating personnel responsible for the real-time generation control and operation of the interconnected Bulk Electric System. If a language other than English is used, both parties shall have and provide upon request, evidence that could include, but is not limited to operator logs, voice recordings or transcripts of voice recordings, electronic communications, or equivalent, of agreement shall be provided to explain the use of the alternate language. (R3.) M3 allows a language other than English. Must the agreement for non-English be in place in advance of the call?</p>
<p>Response: The RC SDT thanks you for your comment. The RC SDT has revised the measure to conform to revisions in the requirement:</p> <p>M3. Each Reliability Coordinator, Transmission Operator, Balancing Authority, Generator Operator, and Distribution Provider shall have and provide upon request evidence that could include, but is not limited to operator logs, voice recordings or transcripts of voice recordings, electronic communications, or equivalent, that will be used to determine that personnel used English as the language for all inter-entity BES reliability communications between and among operating personnel responsible for the real-time generation control and operation of the interconnected BES. If a language other than English is used, both parties shall have and provide upon request evidence that could include, but is not limited to operator logs, voice recordings or transcripts of voice recordings, electronic communications, or equivalent, of agreement to use the alternate language or the law that requires the use of an alternate language.</p> <p>The RC SDT feels that agreement is not required prior to the call, but only prior to the conversation using the alternate language.</p>		
<p>Bonneville Power Administration</p>	<p>No</p>	<p>Issue #1: Measure M3 The measure states that entities “shall have and provide” evidence that “personnel used English as the language for all” communications. This infers that all communications must be documented in some form or fashion and that any outage of the normal communication system must be met with alternative processes which will meet this measure, even if the alternative is the preparation of handwritten notes of each person’s conversations, noting that the communications occurred in English. Unfortunately, there have been times where our Dictaphone stopped recording phone calls, and nobody knew it for days! This measure sets us up for a violation! It’s just a matter of time.</p>
<p>Response: The RC SDT thanks you for your comment. The measure as written is consistent with the requirement. The RC SDT did not receive any other comments to modify this measure.</p>		
<p>IRC Standards Review Committee</p>	<p>No</p>	<p>Conforming changes are required to the Measures based on the suggested modifications to the requirements in question 1.</p>
<p>Response: The RC SDT thanks you for your comment. Changes were made to the Measures to conform to revisions of the requirements.</p>		

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Organization	Yes or No	Question 2 Comment
Midwest ISO Standards Collaborators	No	Conforming changes are required to the Measures based on the suggested modifications to the requirements in question 1.
Response: The RC SDT thanks you for your comment. Changes were made to the Measures to conform to revisions of the requirements.		
Central Lincoln	No	Comments: M4 is of little help regarding R4. How does an entity perform this demonstration, especially in the case of an off-site audit? If left to the regions, there will be no consistency.
Response: The RC SDT thanks you for your comment. Based on comments received on R4 and M4, the RC SDT has revised M4 to: M4. Each Distribution Provider and Generator Operator shall have and provide upon request evidence that could include, but is not limited to operator logs, voice recordings or transcripts of voice recordings, electronic communications, or equivalent that it had Interpersonal Communications capabilities with its Transmission Operator and Balancing Authority for the exchange of Interconnection and operating information. (R4.)		
ReliabilityFirst Corporation	No	No measures are posted for R4 of the revised standard
Response: The RC SDT thanks you for your comment. A measure M4 is in both the redline and clean version of the posted standard.		
E.ON U.S.	No	E.ON U.S. believes that he M1 must be clarified to address whether the testing entity is responsible to develop and implement a mitigation plan when a test is unsuccessful due to an issue at the other end (i.e. non-testing entity).
Response: The RC SDT thanks you for your comment. We have removed the mitigation plan from the requirement and measure.		
Manitoba Hydro	No	Conforming changes are required to the Measures based on the suggested modifications to the requirements in question 1.
Response: The RC SDT thanks you for your comment. Changes were made to the Measures to conform to revisions of the requirements.		
Georgia Transmission Corporation	No	See comments to Question 1 in regards to measurability.
Response: The RC SDT thanks you for your comment. Please see response to question 1.		

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Organization	Yes or No	Question 2 Comment
Illinois Municipal Electric Agency	No	Conforming changes are required to the Measures based on the suggested modifications to the requirements in Question 1.
Response: The RC SDT thanks you for your comment. Changes were made to the Measures to conform to revisions of the requirements.		
Exelon	No	See answer to #1
Response: The RC SDT thanks you for your comment. See response to question 1.		
Hydro-Québec TransÉnergie (HQT)	No	Comments: See our comment for R3 in Q1. Accordingly, M3 should be modify to read as the proposition below: M3. “ that will be used to determine that personnel used English “or another language determine otherwise” as the language for all inter-entity Bulk Electric System reliability communications between and among operating personnel responsible for the real-time generation control and operation of the interconnected Bulk Electric System. If a language other than English is used, upon request, evidence shall be provided to explain the use of the alternate language. (R3.)M3 allows a language other than English. Must the agreement for non-English be in place in advance of the call?
<p>Response: The RC SDT thanks you for your comment. The RC SDT has revised the measure to conform to revisions in the requirement:</p> <p>M3. Each Reliability Coordinator, Transmission Operator, Balancing Authority, Generator Operator, and Distribution Provider shall have and provide upon request evidence that could include, but is not limited to operator logs, voice recordings or transcripts of voice recordings, electronic communications, or equivalent, that will be used to determine that its personnel used English as the language for all inter-entity BES reliability communications between and among operating personnel responsible for the real-time generation control or operation of the interconnected BES. If a language other than English is used, both parties shall have and provide upon request evidence that could include, but is not limited to operator logs, voice recordings or transcripts of voice recordings, electronic communications, or equivalent, of agreement to use the alternate language or the law that requires the use of an alternate language.</p> <p>The RC SDT feels that agreement is not required prior to the call, but only prior to the conversation using the alternate language.</p>		
Duke Energy	No	Replace the phrase “develop a mitigation plan” with the phrase “take action” per our comment on Requirement R1 above. Also, the DP and GOP should be deleted from the Data Retention section requirements for R1/M1 and R2/M2. Need to add a Data Retention requirement for R4/M4 for the DP and GOP.
Response: The RC SDT thanks you for your comment. The measure M1 was revised to conform to suggested revisions to R1. We have also revised the Data Retention section.		
Independent Electricity System	No	M3 and M4 may need to be revised depending on the response to our comments under Q1, above.

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Organization	Yes or No	Question 2 Comment
Operator		
<p>Response: The RC SDT thanks you for your comment. Conforming revisions were made to the measures based on revisions to the requirements.</p>		
MRO NSRS	No	Conforming changes are required to the Measures based on the suggested modifications to the requirements in question 1.
<p>Response: The RC SDT thanks you for your comment. Changes were made to the Measures to conform to revisions of the requirements.</p>		
Xcel Energy	No	Measures should be modified to reflect changes to requirements suggested in question 1.
<p>Response: The RC SDT thanks you for your comment. Changes were made to the Measures to conform to revisions of the requirements.</p>		
American Transmission Company	No	See our comment to question 1
<p>Response: The RC SDT thanks you for your comment. See response to question 1.</p>		
JEA	Yes	<p>M1 - very nice, probably we will also be held responsible for completing the mitigation plans, so perhaps you should go ahead and add that so no one gets caught without sufficient evidence in that regard</p> <p>M2 – fine</p> <p>M3 - this measure would indicate that operators have the authority to agree among themselves to speak other languages, rather than a more formal agreement between entities, which is how I read the language of the requirement. If that is not what is meant, then I would suggest the examples include Memorandums of Agreement or Understanding, Contracts or other more formal mechanisms.</p> <p>M4 - fine</p>
<p>Response: The RC SDT thanks you for your comment. M1: We removed the mitigation plan from R1 and M1.</p> <p>M3: The requirement does not preclude individuals from using an alternate language as long as they agree to do so prior to the conversation.</p>		
FirstEnergy	Yes	However, it is not clear whether to show compliance the voice recordings and associated transcripts are of the test done or of the conversations across those facilities.
<p>Response: The RC SDT thanks you for your comment. Since the requirement is to test, the evidence provided should be sufficient to show that the test</p>		

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Organization	Yes or No	Question 2 Comment
was performed and any appropriate follow up actions taken (in case of failure).		
Western Area Power Administration	Yes	M4 should say "Generator Operator" rather than "Generation Operator"
Response: The RC SDT thanks you for your comment. We have made this revision.		
SERC OC Standards Review Group	Yes	
Liberty Electric Power LLC	Yes	
WECC Reliability Coordinator	Yes	
PacifiCorp	Yes	
Calpine Corporation	Yes	
Southern Company	Yes	
American Electric Power	Yes	
Northeast Utilities	Yes	

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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.

Summary Consideration: Stakeholders suggested adding more VSLs for R2. The RC SDT agreed and drafted additional VSLs reflecting time and the number of entities notified. Other changes to the VSLs were made based on revisions to the requirements.

Organization	Yes or No	Question 3 Comment
Northwest LSE Group	No	With the vague verbiage of R4 coupled with the High and Severe VSL, it is important to clarify R4 with the small DP in mind, and possibly include Lower and Moderate VSLs for smaller load-only DP violations.
<p>Response: The RC SDT thanks you for your comment. Based on the requirement, the RC SDT does not feel that additional VSLs can be written for R4. The intent of the requirement is missed if the responsible entity does not have Interpersonal Communication Capabilities with both its TOP or its BA.</p>		
Northeast Power Coordinating Council	No	see M3 comment for question 2
<p>Response: The RC SDT thanks you for your comment. See response to question 2.</p>		
IRC Standards Review Committee	No	<p>(1) Conforming changes are required to the VSLs based on the suggested modifications to the requirements in question 1.</p> <p>(2) FERC expressed its desire in the June 2008 order on VSLs to have as many VSLs as possible. We suggest since R2 also has a time component in the requirement four VSLs could be written based on the timeliness of the notification as well as the number of impacted entities that were not notified. The VSLs should reflect both components.</p>
<p>Response: The RC SDT thanks you for your comment. 1) Conforming changes were made to the VSLs based on the modifications to the requirements. 2) We have added VSLs based on the time requirements.</p>		
Midwest ISO Standards Collaborators	No	<p>Conforming changes are required to the VSLs based on the suggested modifications to the requirements in question 1.</p> <p>In addition, we suggest 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.</p>
<p>Response: The RC SDT thanks you for your comment. Conforming changes were made to the VSLs based on the modifications to the requirements.</p>		

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Organization	Yes or No	Question 3 Comment
<p>We have added VSLs based on the time requirements.</p>		
Central Lincoln	No	<p>The severity levels have little or no relationship to reliability. Failure to provide a evidence of an agreement per R3, for example, has no impact on reliability by itself; yet it carries the maximum VSL. In reality, the impact would only be severe if the use of an alternate language resulted in a miscommunication.</p>
<p>Response: The RC SDT thanks you for your comment. The VSLs are a metric applied after a requirement has been violated. The intent is to provide a relative measure of how far the action or inaction was from the threshold set in the requirement. Some requirements lend themselves to a relative measure of meeting the threshold (i.e. “almost met”, 12 minutes when the requirement was 10 minutes, etc), and some do not. Those that do not are often termed “binary” requirements (either you meet the threshold or you do not). The relative risk to the bulk electric system of not meeting a requirement is specifically reflected in the requirement’s VRF. The relative size of a registered entity is beyond the scope of the standard drafting team and is addressed through the NERC Statement of Compliance Registry Criteria or taken into account as a mitigating factor through the Regional compliance enforcement programs.</p>		
E.ON U.S.	No	<p>E.ON U.S. suggests that R1 be modified to include the language that when an RC, BA and/or TOP issue a directive it must state: “This is a directive” and the entity receiving the directive must state: "I understand this is a directive". E.ON U.S. also requests that language be added to the requirement that states that this communication protocol is only for reliability related directives and not for other operational directives.</p>
<p>Response: The RC SDT thanks you for your comment. The RC SDT does not agree with your assertion regarding R1. The purpose of R1 is to ensure that operating entities have adequate Interpersonal Communications capabilities.</p>		
Manitoba Hydro	No	<p>Conforming changes are required to the VSLs based on the suggested modifications to the requirements in question 1. In addition, since R2 has a time component in the requirement four VSLs could be written based on the timeliness of the notification.</p>
<p>Response: The RC SDT thanks you for your comment. Conforming changes were made to the VSLs based on the modifications to the requirements. We have also added VSLs based on the time requirements.</p>		
Georgia Transmission Corporation	No	<p>Again, Requirement 3 seems to be an option.</p>
<p>Response: The RC SDT thanks you for your comment. The RC SDT does not agree with your assertion regarding R3. There is a reliability need to speak a common language, especially in issuing and receiving directives.</p>		

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Organization	Yes or No	Question 3 Comment
Illinois Municipal Electric Agency	No	Conforming changes are required to the VSLs based on the suggested modifications to the requirements in Question 1.
Response: The RC SDT thanks you for your comment. Conforming changes were made to the VSLs based on the modifications to the requirements.		
Hydro-Québec TransEnergie (HQT)	No	see M3 comment for question 2
Response: The RC SDT thanks you for your comment. See response to question 2.		
Duke Energy	No	Replace the phrase “develop a mitigation plan” with the phrase “take action to restore the capabilities” per our comment on Requirement R1 above.
Response: The RC SDT thanks you for your comment. Mitigation plan was removed from the requirement.		
Independent Electricity System Operator	No	The VSLs for R3 may have to be changed based on the outcome of our comments in Q2 regarding the language of communication.
Response: The RC SDT thanks you for your comment. Conforming changes were made to the VSLs based on the modifications to the requirements.		
MRO NSRS	No	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.
Response: The RC SDT thanks you for your comment. Conforming changes were made to the VSLs based on the modifications to the requirements. We have also added VSLs based on the time requirements.		
SERC OC Standards Review Group	Yes	
Bonneville Power Administration	Yes	

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Organization	Yes or No	Question 3 Comment
FirstEnergy	Yes	
JEA	Yes	
Liberty Electric Power LLC	Yes	
WECC Reliability Coordinator	Yes	
PacifiCorp	Yes	
Calpine Corporation	Yes	
Western Area Power Administration	Yes	
Southern Company	Yes	
ReliabilityFirst Corporation	Yes	
American Electric Power	Yes	
Northeast Utilities	Yes	

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.

Summary Consideration: Stakeholder consensus has been achieved with respect to the retirement of R1 (the requirement for the TOP and BA to each have data and voice communication with RCs, BAs and TOPs). In response to the majority of the comments, the drafting team has added a new R1 to require that “Reliability Directives” be identified as such, revised and rearranged the two requirements from the last posting so that the new R2 focuses on repeating the intent of a reliability directive and the new R3 focuses on responding to that repeated directive. The drafting team is also coordinating with the RTO SDT and the OPCP SDT (Project 2007-02) on the definition and usage of the term “Reliability Directive”.

The new R1 through R3 are:

R1. When a Reliability Coordinator, Transmission Operator or Balancing Authority requires actions to be executed as a Reliability Directive, the Reliability Coordinator, Transmission Operator or Balancing Authority shall identify the action as a Reliability Directive to the recipient. [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 Reliability Directive issued per Requirement R1, shall repeat the intent of the Reliability Directive back to the issuer of the Reliability Directive. [Violation Risk Factor: High][Time Horizon: Real-Time]

R3. Each Reliability Coordinator, Transmission Operator, and Balancing Authority that identifies an action as a Reliability Directive shall acknowledge the response from the recipient of the Reliability Directive in R2 as correct or reissue the Reliability Directive to resolve any misunderstandings. [Violation Risk Factor: High][Time Horizon: Real-Time]

The proposed definition for Reliability Directive is:

Reliability Directive: A communication initiated by a Reliability Coordinator, Transmission Operator or Balancing Authority where action by the recipient is necessary to address an actual or expected Emergency.

Organization	Yes or No	Question 4 Comment
Northwest LSE Group	No	<p>It would be advantageous to exempt certain smaller Registered Entities (LSE, DP, & PSE) that are non-scheduling/tagging entities. In addition to not having a scheduling/tagging desk, many of these entities do not have a 24/7 desk to receive RC/BA/TOP reliability directives/calls, and are too small (10s of MW) to even be substantially significant in a reliability crisis. Instead of making this Standard applicable to all DPs, LSEs, and PSEs, we suggest that the RC, BAs, and TOPs to yearly publish those LSEs, DPs, and PSEs responsible for responding to emergency reliability directives.</p> <p>Also, it would be advisable for the RC, BA, and TOP giving a reliability directive to clearly preface the instruction with “The following is an emergency reliability directive” to differentiate from normal operations communications. Many smaller entities</p>

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Organization	Yes or No	Question 4 Comment
		<p>do not have the resources to install reliable voice recording equipment, but having access to such recordings would be beneficial towards compliance documentation; thus, it would be helpful to require the directive issuing RC, BA, or TOP to provide a digital copy of the voice recording, or transcript if available on request to the recipient of the directive. Short of a recording or transcript of the recording, it will be difficult to determine how a small entity without recorded line would show compliance other than writing down the directive as it is given and reading it back to the issuer. If the directive is lengthy, this will slow down the process and probably defeat the purpose and value of quick action. Further, there is no guarantee that the receiver will accurately retain a complicated directive if not immediately documented in some way to allow review.</p> <p>Last of all, what is meant by the word “intent”? Must the recipient understand and demonstrate the “why” the directive is given and the intended “outcome,” or merely paraphrase the directive to demonstrate understanding? If the recipient repeats word for word the directive back to the issuer without any other indication that the directive is understood, is this a violation??</p>
<p>Response: The RC SDT thanks you for your comment. The requirements of COM-002 for LSE, DP and PSE simply state that the entity has to repeat the intent of the directive back. The issue you raise concerning smaller entities is valid, but this standard is not the venue at which to make this argument. Registration criteria are outside the scope of this project.</p> <p>We have included a new requirement R1:</p> <p>R1. When a Reliability Coordinator, Transmission Operator or Balancing Authority requires actions to be executed as a Reliability Directive, the Reliability Coordinator, Transmission Operator or Balancing Authority shall identify the action as a Reliability Directive to the recipient. <i>[Violation Risk Factor: High][Time Horizon: Real-Time]</i></p> <p>The RC SDT is proposing a new definition for Reliability Directive to differentiate it from normal operations communications. Our proposed definition is:</p> <p>A communication initiated by a Reliability Coordinator, Transmission Operator or Balancing Authority where action by the recipient is necessary to address an actual or expected Emergency.</p> <p>The RTO SDT (Project 2007-03) is also working on a similar path and the RC SDT is coordinating with that team.</p> <p>The word “intent” was chosen so that the recipient did not have to repeat the directive verbatim and to also indicate an understanding of the directive. If a recipient repeats the directive verbatim, it is not a violation of the requirement, as it would also capture the intent.</p>		
Northeast Power Coordinating Council	No	<p>Support the intent but not the existing language. Do not support Requirements that include some examples since the examples can be confused with the Requirement. Do not support one written Requirement that has two requirements. Recommend the following Requirements: A new R1 - Each Entity shall have Operational Procedure requiring that communications directives be repeated back to the issuer. R2 leave as is. A new R3 If not repeated, then issuer shall request the receiving Entity to repeat the communication directive. A new R4 The issuer will acknowledge the correctness of the repetition of the communications directive.</p>
<p>Response: The RC SDT thanks you for your comment. The RC SDT does not see a reliability benefit to having an Operational Procedure requirement, as</p>		

Consideration of Comments on Project 2006-06 Reliability Coordination

Organization	Yes or No	Question 4 Comment
<p>it would be redundant since the standard COM-002 would be mandatory and enforceable and requires the actions in the Operational Procedure that you suggest. The RC SDT feels that we have the same requirements that you suggest but in a different arrangement.</p>		
<p>SERC OC Standards Review Group</p>	<p>No</p>	<p>The term “emergency” has a broad definition and other standards use “adverse conditions” or “adverse reliability impact”. There should be a consistency of terms when describing a system condition. The STD should include a definition of “directive” that includes more than “Emergency” operational conditions. Should this requirement be modified to include the term “Directive” and the definition of this term added to the NERC Glossary?</p>
<p>Response: The RC SDT thanks you for your comment. The RC SDT is proposing a new definition for Reliability Directive to differentiate it from normal operations communications. The RC SDT appreciates the baggage that comes with the defined term “Emergency”. However, it is the best fit with the normal messaging that has historically occurred in the bulk electric reliability community. Our proposed definition is:</p> <p>A communication initiated by a Reliability Coordinator, Transmission Operator or Balancing Authority where action by the recipient is necessary to address an actual or expected Emergency.</p> <p>This term has been included in the requirements of COM-002. The RTO SDT (Project 2007-03) is also working on a similar path and the RC SDT is coordinating with that team.</p>		
<p>Midwest ISO Standards Collaborators</p>	<p>Yes</p>	<p>We largely agree with the changes to the requirements and believe 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. We believe that the SDT could further support resolution to this directive issue by developing a definition for directive. We propose the following definition: Directive or 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.</p> <p>In requirement 1, we do 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.</p>
<p>Response: The RC SDT thanks you for your comment. 1) The RC SDT is proposing a new definition for Reliability Directive to differentiate it from normal operations communications. Our proposed definition is:</p> <p>A communication initiated by a Reliability Coordinator, Transmission Operator or Balancing Authority where action by the recipient is necessary to address an actual or expected Emergency.</p> <p>This term has been included in the requirements of COM-002. The RTO SDT (Project 2007-03) is also working on a similar path and the RC SDT is coordinating with that team.</p> <p>2) The RC SDT has revised the requirement to remove that part since original R2 required the recipient to repeat the intent of the directive.</p>		

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Organization	Yes or No	Question 4 Comment
Central Lincoln	No	The inclusion of load serving entities and distribution providers does not address any present BES reliability gap.
<p>Response: The RC SDT thanks you for your comment. Loads are under the direct control of Load Serving Entities while underfrequency relays are often under the direct control of distribution providers. Current NERC standards do not address the possibility that a Reliability Directive may be issued to either of these entities. The requirements of COM-002 for LSE and DP simply state that the entity has to repeat the intent of the directive back since these entities may receive reliability directives.</p>		
JEA	No	R1: just to avoid possible auditor misunderstandings the SDT might consider replacing the words "or repeat the original statement" to "reissue the directive" so that the RC does not get into trouble if the second statement is not verbatim of the first. This also helps clarify that another statement is required from the recipient along with a final acknowledgement from the RC that the intent is correct.
<p>Response: The RC SDT appreciates your comment. You have identified a potential problem; the RC SDT agrees with your comment and has replaced the words "repeat the original statement" with "reissue the Reliability Directive".</p>		
Liberty Electric Power LLC	No	The proposed standard does not require the RC, TO, or BA to declare an emergency to the GO when issuing a directive. There has been confusion at times in the past as to whether the entity is issuing a directive based on economics or due to an emergency. The standard should be amended to require the RC/TO/BA to state the directive is due to a declared emergency. The GO is required to repeat back the intent of an emergency directive, but is not required to repeat back the intent of economic directive. This can lead to a finding of a severe VSL non-compliance on the part of the GO due to a failure of the RC/TO/BA to clearly state the nature of the directive.
<p>Response: The RC SDT thanks you for your comment. The RC SDT is proposing a new definition for Reliability Directive to differentiate it from normal operations communications. Our proposed definition is:</p> <p>A communication initiated by a Reliability Coordinator, Transmission Operator or Balancing Authority where action by the recipient is necessary to address an actual or expected Emergency.</p> <p>This term has been included in the requirements of COM-002. The RTOSDT (Project 2007-03) is also working on a similar path and the RC SDT are coordinating with that team. A new R1 has been developed that states:</p> <p>When a Reliability Coordinator, Transmission Operator or Balancing Authority requires actions to be executed as a Reliability Directive, the Reliability Coordinator, Transmission Operator or Balancing Authority shall identify the action as a Reliability Directive to the recipient. <i>[Violation Risk Factor: High][Time Horizon: Real-Time]</i></p>		
ReliabilityFirst	No	FERC 693 excludes distribution providers if they are not a user, owner or operator of BES. This should be reflected in R2 of

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Organization	Yes or No	Question 4 Comment
Corporation		the standard
<p>Response: The RC SDT thanks you for your comment. Any distribution provider excluded by FERC Order 693 would not be held to the standard since standards only apply to registered entities. FERC Order 693 endorses the NERC Statement of Compliance Registry criteria (paragraph 512) and also adopted their proposal to require the ERO to modify COM-002 to apply to distribution providers and generator operators (paragraph 512). The Functional Model describes the real-time relationships between entities. Among those relationships, the DP:</p> <ul style="list-style-type: none"> Implements voltage reduction and sheds load as directed by the Transmission Operator or Balancing Authority <p>Such directives fall under COM-002 requirements.</p>		
Illinois Municipal Electric Agency	No	<p>IMEA questions the necessity of expanding the applicability of COM-002 as proposed in R2, particularly to the DP, LSE, and PSE functions. IMEA recommends accomplishing the intent of COM-002-3 R2 by simply referring to COM-002-3 R1 in IRO-001-2 R2 which requires those entities to comply with the RC directive. Thus it would be understood that the functional entity had repeated the directive in order to comply with it; thereby avoiding the necessity of expanding applicability to another reliability standard.</p>
<p>Response: The RC SDT thanks you for your comment. The RC SDT feels that there is a difference between complying with a directive and communicating the directive effectively. The requirements of COM-002 for LSE, PSE and DP simply state that the entity has to repeat the intent of the directive back since these entities may receive reliability directives. The drafting team feels that the current draft adds clarity to the requirements.</p>		
Exelon	No	See answer # 1
<p>Response: The RC SDT thanks you for your comment. See response to answer #1.</p>		
Hydro-Québec TransEnergie (HQT)	No	<p>Support the intent but not the existing language. Do not support Requirements that include some examples since the examples can be confused with the Requirement. Do not support one written Requirement that has two requirements. Recommend the following Requirements A new R1 - Each Entity shall have Operational Procedure requiring that communications directives be repeated back to the issuer R2 leave as is. A new R3 If not repeated, then issuer shall request the receiving Entity to repeat the communication directive. A new R4 The issuer will acknowledge the correctness of the repetition of the communications directive</p>
<p>Response: The RC SDT thanks you for your comment. There are no examples in any of the requirements of COM-002-3 as posted. There are no compound requirements remaining in COM-002-3 as posted. The RC SDT does not see a reliability benefit to having an Operational Procedure requirement, as it would be redundant since the standard COM-002 would be mandatory and enforceable and requires the actions in the Operational Procedure that you suggest. The RC SDT feels that we have the same requirements that you suggest but in a different arrangement that is internally consistent.</p>		

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Organization	Yes or No	Question 4 Comment
Indiana Municipal Power Agency	No	<p>The requirements do not consider a pre-recorded communication that might be sent out from the Transmission Operator to Generator Operators or any other entity. If this communication is a directive associated with a real-time operational emergency condition (depending on the judgment used by an entity or auditor), it does not make sense to repeat back a pre-recorded message on the phone. It might be good to clearly state in the standard that pre-recorded messages do not need to be repeated back.</p>
<p>Response: The RC SDT thanks you for your comment. The RC SDT is proposing a new definition for Reliability Directive to differentiate it from normal operations communications. Our proposed definition is:</p> <p>A communication initiated by a Reliability Coordinator, Transmission Operator or Balancing Authority where action by the recipient is necessary to address an actual or expected Emergency.</p> <p>This term has been included in the requirements of COM-002. The RC SDT can not envision a situation, regardless of the technology, where a Reliability Directive would be issued without confirmation from the recipient and acknowledgement of accuracy. However, even if there were an occasion as suggested by your comment, the bulk electric system can only remain reliable by coordinating actions between reliability entities. A pre-recorded communication is a broadcast, not a coordinating activity. The RTO SDT (Project 2007-03) is also working on a similar path and the RC SDT are coordinating with that team.</p>		
Duke Energy	No	<p>We agree with adding the clarification that these requirements refer to “emergency” communications, but we think the word “Emergency” should be capitalized to further clarify that it is a defined term in the NERC Glossary.</p> <p>Also, the phrase “require the recipient of the verbal directive to repeat the intent of the directive back” should be changed to “have the recipient of the verbal directive repeat the intent of the directive back”. This avoids making the issuer of the directive make a statement requiring a repeat back unless the recipient actually fails to repeat back as normally expected.</p>
<p>Response: The RC SDT thanks you for your comment. We have removed the word “emergency” and are proposing a definition of Reliability Directive which includes the defined term “Emergency” and which is being posted for comment.</p> <p>The RC SDT agrees with the intent of your comment. The phrase you mention has been removed from R1 as it is required by R2. We have made other edits to tighten the requirements as well.</p>		
Consumers Energy Company	No	<p>COM-002 R2 specifies the Generator Operator that receives a directive from the Transmission Operator, Reliability Coordinator or Balancing Authority must repeat the intent of the directive back to the Transmission Operator. COM-002 M2 specifies that evidence must be retained in the form of either voice recordings or transcripts by the generator operator. Since the Transmission Operator, Reliability Coordinator and Balancing Authority already have voice recording capability (centrally located), it is not necessary for the Generator to also install voice recording capability at each generating station. We suggest the wording of COM-002 be changed such that only the Transmission Operator, Reliability Coordinator and Balancing</p>

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Organization	Yes or No	Question 4 Comment
		Authority be required to keep voice recordings or transcripts.
<p>Response: The RC SDT thanks you for your comment. While recordings may be available from other entities, a Generator Operator has mandatory requirements with which it must comply. Generator Operators must have evidence that they complied with the requirement. The evidence mentioned in the measures is a suggestion of possible methods of evidence. We have revised the measure to include "...which could include, but is not limited to, voice recordings, transcripts of voice recordings or operator logs..."</p>		
Independent Electricity System Operator	No	<p>(i) We suggest the word "emergency" be capitalized since it is a defined term which generally covers the conditions under which directives are issued.</p> <p>(ii) We further suggest that to avoid confusion between operating instructions and directives, the term directive should be defined as suggested below: Directive or Directive A verbal communication by a Reliability Coordinator, Transmission Operator, or Balancing Authority that requires complying action by the recipient to prevent or mitigate an Adverse Reliability Impact.</p> <p>(iii) Since R1 contains two requirements, there may be some benefit in separating these since that would make the VSLs clearer, i.e. separate the requirements placed on the issuer of the directive to (a) request the recipient to repeat the intent of the directive and (b) to acknowledge the response of the recipient as correct.</p>
<p>Response: The RC SDT thanks you for your comment.</p> <p>i) We have removed the word "emergency" and are proposing a definition of Reliability Directive which includes the defined term "Emergency" and which is being posted for comment.</p> <p>ii) The RC SDT is proposing a definition of Reliability Directive that will be posted for comment. Our proposed definition is:</p> <p>A communication initiated by a Reliability Coordinator, Transmission Operator or Balancing Authority where action by the recipient is necessary to address an actual or expected Emergency.</p> <p>iii) The RC SDT agrees and has modified R1. Since R2 requires the recipient to repeat the intent of the directive, we have removed the part of R1 that states the issues shall require the recipient to repeat the directive. This removed the compound requirement.</p>		
MRO NSRS	No	<p>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:</p> <p>Directive or Directive – A verbal communication by a Reliability Coordinator, Transmission Operator, or Balancing Authority</p>

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Organization	Yes or No	Question 4 Comment
		<p>that requires action by the recipient to prevent or mitigate an Adverse Reliability Impact.</p> <p>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.</p>
<p>Response: The RC SDT thanks you for your comment. 1) The RC SDT is proposing a new definition for Reliability Directive to differentiate it from normal operations communications. Our proposed definition is:</p> <p>A communication initiated by a Reliability Coordinator, Transmission Operator or Balancing Authority where action by the recipient is necessary to address an actual or expected Emergency.</p> <p>This term has been included in the requirements of COM-002. The RTOSDT (Project 2007-03) is also working on a similar path and the RC SDT is coordinating with that team.</p> <p>We have removed the “require” part of R1 since R2 is an enforceable requirement for repeating the directive.</p>		
American Transmission Company	No	<p>are supportive of the language regarding “directives” which clarifies that directives are those which involve operating emergencies. However, in R1, we believe that the word “requires” should be changed to “request”. An entity can request that another entity repeat back a directive but we cannot “require” it.</p>
<p>Response: The RC SDT thanks you for your comment. The RC SDT is proposing a definition of Reliability Directive that will be posted for comment. Our proposed definition is:</p> <p>A communication initiated by a Reliability Coordinator, Transmission Operator or Balancing Authority where action by the recipient is necessary to address an actual or expected Emergency.</p> <p>We have removed the “require” part of R1 since R2 is an enforceable requirement for repeating the directive.</p>		
IRC Standards Review Committee	Yes	<p>(1) We largely agree with the changes to the requirements and believe 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. We believe that the SDT could further support resolution to this Directive issue by developing a definition for Directive. We propose the following definition: 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. Please note that AESO already has this term defined. The above suggested definition may be different from the AESO’s definition.</p> <p>(2) In requirement 1, we do believe that another word than “require” should be used. Consider using “request”. An RC, BA,</p>

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Organization	Yes or No	Question 4 Comment
		and TOP can't force the recipient of the Directive to repeat it back. They can ask or request it be repeated back though.
<p>Response: The RC SDT thanks you for your comment.</p> <p>1) The RC SDT is proposing a new definition for Reliability Directive to differentiate it from normal operations communications. Our proposed definition is:</p> <p>A communication initiated by a Reliability Coordinator, Transmission Operator or Balancing Authority where action by the recipient is necessary to address an actual or expected Emergency.</p> <p>This term has been included in the requirements of COM-002. The RTO SDT (Project 2007-03) is also working on a similar path and the RC SDT is coordinating with that team.</p> <p>2) The RC SDT has revised the requirement to remove that part since original R2 required the recipient to repeat the intent of the directive.</p>		
Calpine Corporation	Yes	Calpine supports three part communications when verbal directives are issued during real-time operational emergency conditions. Calpine believes all issued directives should be explicitly identified as such.
<p>Response: The RC SDT thanks you for your comment. A new R1 has been developed that states:</p> <p>When a Reliability Coordinator, Transmission Operator or Balancing Authority requires actions to be executed as a Reliability Directive, the Reliability Coordinator, Transmission Operator or Balancing Authority shall identify the action as a Reliability Directive to the recipient. <i>[Violation Risk Factor: High][Time Horizon: Real-Time]</i></p>		
Western Area Power Administration	Yes	This is a very good improvement. Some Regional Entities were interpreting every communication from a control room as a "directive" and stating that "directives" were equal to any "normal instruction" that related to operations of the power system. Making it clear that the directives are associated with emergency conditions is a big improvement. The drafting team may wish to consider additional clarification, such as, "The entity that issues a verbal directive shall make it known during the communication that, "This is a directive"? . All parties to the communication would be clear that the real-time situation was an emergency condition, and that the requirements for repeating the intent were in effect.
<p>Response: The RC SDT thanks you for your comment. The RC SDT is proposing a new definition for Reliability Directive to differentiate it from normal operations communications. Our proposed definition is:</p> <p>A communication initiated by a Reliability Coordinator, Transmission Operator or Balancing Authority where action by the recipient is necessary to address an actual or expected Emergency.</p> <p>This term has been included in the requirements of COM-002. The RTO SDT (Project 2007-03) is also working on a similar path and the RC SDT is coordinating with that team. A new R1 has been developed that states:</p>		

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Organization	Yes or No	Question 4 Comment
<p>When a Reliability Coordinator, Transmission Operator or Balancing Authority requires actions to be executed as a Reliability Directive, the Reliability Coordinator, Transmission Operator or Balancing Authority shall identify the action as a Reliability Directive to the recipient. <i>[Violation Risk Factor: High][Time Horizon: Real-Time]</i></p>		
American Electric Power	Yes	<p>AEP does generally agree with the revisions, but we have concerns with the much wider scope of three part communications that expand the required voice or transcript evidence. There is no rationale provided for changing the text in R1 and M1, and adding a new R2 and M2. We would recommend that these items remain as stated in Version 2.</p>
<p>Response: The RC SDT thanks you for your comment. The RC SDT's intent was to create a consistent set of noncompound requirements and to provide clarity according to the scope of the drafting team.</p>		
Manitoba Hydro	Yes	<p>For the most part agree with the changes to the requirements and believe 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. The SDT could further support resolution to this directive issue by developing a definition for directive.</p> <p>In requirement 1, I would use another word than "require". 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.</p>
<p>Response: The RC SDT thanks you for your comment.</p> <p>1) The RC SDT is proposing a new definition for Reliability Directive to differentiate it from normal operations communications. Our proposed definition is:</p> <p>A communication initiated by a Reliability Coordinator, Transmission Operator or Balancing Authority where action by the recipient is necessary to address an actual or expected Emergency.</p> <p>This term has been included in the requirements of COM-002. The RTOSDT (Project 2007-03) is also working on a similar path and the RC SDT is coordinating with that team. 2) The RC SDT has revised the requirement to remove that part since original R2 required the recipient to repeat the intent of the directive.</p>		
FirstEnergy	Yes	<p>1. We agree with the clarification in R1 that a directive per COM-002-3 is a "verbal directive associated with real-time operational emergency conditions". We understand this to be a "Reliability" directive used during times of emergency or in situations where reliability may be an issue. Also, with this clarification, it confirms that the term "directive", as used in this standard, does not include "Operational" directives issued by System Operators during normal system conditions to change the status of an element such as a circuit breaker.</p> <p>2. The industry does not appear to have a clear, consistent definition of what constitutes a directive. We suggest the standard require the person issuing a directive to use the phrase "I am directing you to ?", "I am ordering you to ?" or something similar</p>

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Organization	Yes or No	Question 4 Comment
		<p>to invoke the three part communication requirement.</p> <p>3. Since this standard deals with communications and coordination during emergency conditions, it may be helpful to change the title of the standard to "Communications and Coordination Emergency Conditions".</p> <p>4. The phrase "the intent of the directive" could be difficult to comply with and measure. The words "the intent of" should be removed from Requirements R1 and R2.</p>
<p>Response: The RC SDT thanks you for your comment. 1) The RC SDT is proposing a new definition for Reliability Directive to differentiate it from normal operations communications. Our proposed definition is:</p> <p>A communication initiated by a Reliability Coordinator, Transmission Operator or Balancing Authority where action by the recipient is necessary to address an actual or expected Emergency.</p> <p>This term has been included in the requirements of COM-002. The RTO SDT (Project 2007-03) is also working on a similar path and the RC SDT is coordinating with that team.</p> <p>2) We agree and have included a new R1 that states:</p> <p>When a Reliability Coordinator, Transmission Operator or Balancing Authority requires actions to be executed as a Reliability Directive, the Reliability Coordinator, Transmission Operator or Balancing Authority shall identify the action as a Reliability Directive to the recipient. <i>[Violation Risk Factor: High][Time Horizon: Real-Time]</i></p> <p>3) The RC SDT disagrees. This standard covers all interpersonal communications, not just emergency communications. The title stays as is.</p> <p>4) The phrase was included so that the recipient did not have to repeat the directive verbatim and to also indicate an understanding of the directive. If a recipient repeats the directive verbatim, it is not a violation of the requirement, as it would also capture the intent. The goal of the RC SDT is to assure continued reliability without creating a trap by requiring word-for-word repetition.</p>		
Northeast Utilities	Yes	
Xcel Energy	Yes	
Bonneville Power Administration	Yes	
WECC Reliability Coordinator	Yes	
PacifiCorp	Yes	

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Organization	Yes or No	Question 4 Comment
Southern Company	Yes	
Georgia Transmission Corporation	Yes	

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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.

Summary Consideration: Stakeholder consensus has been achieved with respect to the retirement of R1 and M1 from the last approved version of this standard. In accord with the majority of commenters, the drafting team made changes to the Measures to bring them into conformance with the adopted suggestions from question 4 for improving the Requirements. Specifically, a new R1 was added to require that reliability directives be identified as such – and the two requirements from the last posting were rephrased and rearranged for clarity. The Measures were changed to match the revised requirements.

Organization	Yes or No	Question 5 Comment
Illinois Municipal Electric Agency		Conforming changes are required to the Measures based on the suggested modifications to the requirements in Question 4.
Response: The RC SDT thanks you for your comment. The measures were revised to reflect changes to the requirements.		
Hydro-Québec TransEnergie (HQT)	No	Address the new proposed Requirements above in Question 4.
Northeast Power Coordinating Council	No	Addressed the new proposed Requirements above in Question 4.
Response: The RC SDT thanks you for your comment. The measures were revised to reflect changes to the requirements.		
Duke Energy	No	Change “emergency” to “Emergency” per comment on R1 above. Also change the phrase “required the recipient of the verbal directive to repeat” to “had the recipient of the verbal directive repeat” per our comment on R1 above.
Response: The RC SDT thanks you for your comment. We have removed the word “emergency” and are proposing a definition of Reliability Directive which includes the defined term “Emergency” and which is being posted for comment.		
Northwest LSE Group	No	Only in making the Measures agree with the suggested changes to the requirements above.
Response: The RC SDT thanks you for your comment. See response to Question 4. The measures have been revised to reflect changes to the requirements.		

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Organization	Yes or No	Question 5 Comment
Central Lincoln	No	M2 goes beyond R2 in requiring recordings. This will be cost prohibitive for small entities that have little impact on the BES. Telephone recording equipment will be needed on company phones, and some way to handle the recording of directives and responses that occur after hours on home or cell phones must be handled. Drafters seem to have missed the fact that not all the applicable entities have 24/7 dispatch centers.
<p>Response: The RC SDT thanks you for your comment. The measure lists possible examples of evidence to prove compliance with the requirement. It does not impose any additional requirements or the purchase of recording systems. We have revised the measure to include "...which could include, but is not limited to, voice recordings, transcripts of voice recordings or operator logs..."</p>		
JEA	No	Not all entities have recorded lines. The standard does not directly require the to record their lines, but the measure implies it. It seems that a written log should be sufficient. Since both sides of the conversation gets audited, the auditors will have ample opportunity to check up on both sides.
<p>Response: The RC SDT thanks you for your comment. The measure lists possible examples of evidence to prove compliance with the requirement. It does not impose any additional requirements or the purchase of recording systems. We have revised the measure to include "...which could include, but is not limited to, voice recordings, transcripts of voice recordings or operator logs..."</p>		
Northeast Utilities	No	NU agrees with expanding the applicability of the Standard beyond the Reliability Coordinators, Balancing Authorities and Transmission Operators to ensure that the recipient of a verbal directive repeats back the directive to the issuer (R2). Despite NU's agreement with R2, NU believes that M2 is duplicative to the intent of M1 and unnecessarily requires the installation of voice recording capabilities at the entities other than a RC, BA or TOP. It is our belief that the voice recordings of the RC, BA and TOP (M1) provide the evidentiary support required by all applicable entities.
<p>Response: The RC SDT thanks you for your comment. The measure lists possible examples of evidence to prove compliance with the requirement. It does not impose any additional requirements or the purchase of recording systems. We have revised the measure to include "...which could include, but is not limited to, voice recordings, transcripts of voice recordings or operator logs..."</p>		
Independent Electricity System Operator	No	Comments: Some changes may be necessary based on the SDT's response to our suggestion in Q4.
<p>Response: The RC SDT thanks you for your comment. See response to your comments on question 4.</p>		
MRO NSRS	No	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.

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Organization	Yes or No	Question 5 Comment
Response: The RC SDT thanks you for your comment. "Require" was removed from the requirement and the measure edited appropriately.		
American Transmission Company	No	See our comments to question 4
Response: The RC SDT thanks you for your comment. See response to your comments on question 4.		
IRC Standards Review Committee	Yes	We largely agree 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.
Midwest ISO Standards Collaborators	Yes	We largely agree 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.
Response: The RC SDT thanks you for your comment. "Require" was removed from the requirement and the measure edited appropriately.		
American Electric Power	Yes	As described in the question 4 response, there is no rationale provided for changing the text in R1 and M1, and adding a the new R2 and M2. We would recommend that these items remain as stated in Version 2.
Response: The RC SDT thanks you for your comment. See response to question 4.		
Manitoba Hydro	Yes	For the most part agree 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.
Response: The RC SDT thanks you for your comment. "Require" was removed from the requirement and the measure edited appropriately.		
SERC OC Standards Review Group	Yes	
Bonneville Power Administration	Yes	
FirstEnergy	Yes	

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Organization	Yes or No	Question 5 Comment
Liberty Electric Power LLC	Yes	
WECC Reliability Coordinator	Yes	
PacifiCorp	Yes	
Calpine Corporation	Yes	
Western Area Power Administration	Yes	
Southern Company	Yes	
ReliabilityFirst Corporation	Yes	
Georgia Transmission Corporation	Yes	

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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.

Summary Consideration: Several stakeholders suggested revisions to the VSLs based on suggested revisions to the requirements. The RC SDT made changes to the VSLs to conform to revisions to the requirements.

Organization	Yes or No	Question 6 Comment
Northwest LSE Group	No	Only in making the Measures agree with the suggested changes to the requirements above.
Response: The RC SDT thanks you for your comment. The Measures have been revised to reflect changes to the requirements.		
Northeast Power Coordinating Council	No	Address the new proposed Requirements.
Response: The RC SDT thanks you for your comment. The RC SDT feels that we have the same requirements that you suggest but in a different arrangement. The new proposed Requirements have been addressed.		
Bonneville Power Administration	No	<p>Comments: Issue #1: Violation Severity Level. The Moderate and Severe VSLs for Requirement R1 can lead to confusion. For instance, the Moderate VSL states that the responsible entity “did not acknowledge the recipient was correct in the repeated directive OR (emphasis theirs) failed to repeat the intent of the original statement to resolve any misunderstandings. ”What is it saying here? Is it dinging the responsible entity for making no response at all to the recipient after they repeated the intent of the message? Or is that what the Severe VSL is dinging for when it includes an AND rather than an OR in the statement? I can’t tell what the drafting team was intending with their statements, but one of the statements seem to infer that the responsible entity can actually be dinged for not doing both, acknowledging the recipient as being correct in their response and at the very same time repeating the intent of the original statement to resolve any misunderstandings because the recipient was incorrect in their response. This then argues that the recipient can be both correct and incorrect at the same time. I didn’t think that was possible “similar to binary code” either you get a one or a zero, but not both and never neither!</p> <p>I would argue that the drafting team should rewrite their VSLs to succinctly state that the responsible entity failed to respond after the recipient repeated the intent of the message. With that in mind, either the Moderate or the Severe VSL will be rewritten in an understandable way and the other VSL will disappear in the realms of impossible things.</p>
Response: The RC SDT thanks you for your comment. We have eliminated the Moderate VSL and only have the Severe.		

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Organization	Yes or No	Question 6 Comment
IRC Standards Review Committee	No	<p>If the suggestion regarding “require” in Q4 is accepted, conforming changes to the VSL need to made. Additionally, we believe 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, we believe 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. We agree 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.</p>
<p>Response: The RC SDT thanks you for your comment. We have modified all the requirements in a way that addresses your comments. Conforming changes to the VSLs have been made.</p>		
Midwest ISO Standards Collaborators	No	<p>If the suggestion regarding “require” in Q4 is accepted, conforming changes to the VSL need to made. Additionally, we believe 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, we believe 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. We agree 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.</p>
<p>Response: The RC SDT thanks you for your comment. We have modified all the requirements in a way that addresses your comments. Conforming changes to the VSLs have been made.</p>		
American Electric Power	No	<p>AEP is concerned that the severe VSL assigned to Requirement 2 is excessive and should be reconsidered.</p>
<p>Response: The RC SDT thanks you for your comment. We believe that R2 is a binary requirement which results in a Severe VSL. The entity either performed the requirement or did not.</p>		

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Organization	Yes or No	Question 6 Comment
Manitoba Hydro	No	<p>If the suggestion regarding “require” in Q4 is accepted, conforming changes to the VSL need to be made. Additionally, believe 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, we believe 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. We agree 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.</p>
<p>Response: The RC SDT thanks you for your comment. We have modified all the requirements in a way that addresses your comments. Conforming changes to the VSLs have been made.</p>		
Illinois Municipal Electric Agency	No	<p>Conforming changes are required to the VSLs based on the suggested modifications to the requirements in Question 4.</p>
<p>Response: The RC SDT thanks you for your comment. The RC SDT feels that there is a difference between complying with a Reliability Directive and communicating the Reliability Directive effectively. The requirements of COM-002 for LSE, PSE and DP simply state that the entity has to repeat the intent of the directive back since these entities may receive Reliability Directives. The drafting team feels that the current draft adds clarity to the requirements. The VSLs were revised to match the revised requirements.</p>		
Hydro-Québec TransEnergie (HQT)	No	<p>address the new proposed Requirements.</p>
<p>Response: The RC SDT thanks you for your comment. The RC SDT does not see a reliability benefit to having an Operational Procedure requirement, as it would be redundant since the Standard COM-002 would be mandatory and enforceable and requires the actions in the Operational Procedure that you suggest. The RC SDT feels that we have the same requirements that you suggest but in a different arrangement.</p>		
Duke Energy	No	<p>Change “emergency” to “Emergency” in the VSLs per our comment on R1 above. Also, we don’t see a tangible difference between the Moderate and Severe VSLs, and the High VSL should really be the Severe VSL. We suggest having just a High and a Severe VSL as follows:” High VSL: “The responsible entity issued a verbal directive associated with real-time operating Emergency conditions and had the recipient repeat back the intent of the directive, but did not either acknowledge the recipient was correct in the repeated directive or failed to repeat the intent of the original statement to resolve any misunderstandings.” Severe VSL: “The responsible entity issued a verbal directive associated with real-time operating</p>

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Organization	Yes or No	Question 6 Comment
		Emergency conditions, but did not have the recipient repeat back the intent of the directive.”
<p>Response: The RC SDT thanks you for your comment. We have removed the word “emergency” and are proposing a definition of Reliability Directive which will be posted for comment. Our proposed definition is:</p> <p>A communication initiated by a Reliability Coordinator, Transmission Operator or Balancing Authority where action by the recipient is necessary to address an actual or expected Emergency.</p> <p>We have removed the “require” part of R1 since R2 is an enforceable requirement for repeating the directive. Conforming changes to the VSLs have been modified.</p>		
Independent Electricity System Operator	No	<p>The sequence of communication required under R1 is intended to ensure that directives from the issuing entities are clearly understood. The earlier this sequence is broken, the greater the uncertainty that this goal is achieved and the greater should be the severity level. Thus, failure to request that the recipient entity repeat the intent of the directive “ the earliest step in the sequence - should attract the “Severe” VSL.Also, failing to repeat the original directive when there is any misunderstanding, again, in our view, leaves the intent of the directive equally unclear and should also attract a “Severe” VSL.Failing to acknowledge the recipient was correct in the repeating the intent of the directive “ the last step in the sequence “ is already assigned a “Moderate” VSL and this should not be repeated in the “Severe” VSL.We therefore suggest that the two conditions under “High” and “Severe” in R1 be combined as one under “Severe” as follows: The responsible entity issued a verbal directive associated with real-time operating emergency conditions but did not require the recipient to repeat the intent of the directive;ORThe responsible entity issued a verbal directive associated with real-time operating emergency conditions and required the recipient to repeat the intent of the directive, but failed to repeat the intent of the original statement to resolve any misunderstandings.</p>
<p>Response: The RC SDT thanks you for your comment. In the revised standard, R2 requires the recipient to repeat the intent of the directive. We have removed the part of R1, (now R3), that states the issuer shall “require” the recipient to repeat the directive. We have made revisions to the VSLs to match the requirements.</p>		
MRO NSRS	No	<p>If the suggestion regarding “require” in Q4 is accepted, conforming changes to the VSL need to 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.</p> <p>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</p>

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Organization	Yes or No	Question 6 Comment
		<p>was correct.</p> <p>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.</p>
<p>Response: The RC SDT thanks you for your comment. The RC SDT is proposing a definition of Reliability Directive that will be posted for comment. Our proposed definition is:</p> <p>A communication initiated by a Reliability Coordinator, Transmission Operator or Balancing Authority where action by the recipient is necessary to address an actual or expected Emergency.</p> <p>We have removed the “require” part of R1 since R2 is an enforceable requirement for repeating the directive. Conforming changes to the VSLs have been modified.</p>		
SERC OC Standards Review Group	Yes	If R1 changes as suggested in Question 4, the VSLs will need to be changed also.
<p>Response: The RC SDT thanks you for your comment. The RC SDT is proposing a new definition for Reliability Directive to differentiate it from normal operations communications. Our proposed definition is:</p> <p>A communication initiated by a Reliability Coordinator, Transmission Operator or Balancing Authority where action by the recipient is necessary to address an actual or expected Emergency.</p> <p>The VSLs have been revised to reflect the proposal.</p>		
FirstEnergy	Yes	
JEA	Yes	
Liberty Electric Power LLC	Yes	
WECC Reliability Coordinator	Yes	

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Organization	Yes or No	Question 6 Comment
PacifiCorp	Yes	
Calpine Corporation	Yes	
Western Area Power Administration	Yes	
Southern Company	Yes	
ReliabilityFirst Corporation	Yes	
Georgia Transmission Corporation	Yes	
Northeast Utilities	Yes	

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.

Summary Consideration: Stakeholders suggested removing the word “outages” after “cascading” as per the NERC Glossary of Terms and a FERC Directive issued December 27, 2007. The RC SDT made the revision. There were no other suggested revisions to the definition.

Organization	Yes or No	Question 7 Comment
Northeast Power Coordinating Council	No	Remove the word “outages” that appears after “cascading” as per NERC Glossary and FERC Directive issued Dec. 27, 2007.
Hydro-Québec TransEnergie (HQT)	No	Remove the word “outages” that appears after “cascading” as per NERC Glossary and FERC Directive issued Dec. 27, 2007.
Northeast Utilities	No	Remove the word “outages” that appears after “cascading” as per NERC Glossary and FERC Directive issued Dec. 27, 2007.
Independent Electricity System Operator	No	Comments: Remove the word “outages” that appears after “cascading” as per NERC Glossary and FERC Directive issued Dec. 27, 2007.
Response: The RC SDT thanks you for your comment. The RC SDT agrees and has removed “outages”. We have also capitalized “Cascading”		
FirstEnergy	Yes	If the term "cascading" used in the definition is referring to the NERC-defined term, it should be capitalized.
Response: The RC SDT thanks you for your comment. The RC SDT agrees and has capitalized “Cascading”		
IRC Standards Review Committee	Yes	The drafting team should consider that NERC is moving away from using the term "cascading outages". FERC has directed NERC to rescind this definition, and use the defined term "cascading" instead.
Response: The RC SDT thanks you for your comment. The RC SDT agrees and has removed “outages”. We have also capitalized “Cascading”		
SERC OC Standards Review Group	No	What is the difference between “Adverse Reliability Impacts” and the definition of an IROL? Is this going to replace an IROL?

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Organization	Yes or No	Question 7 Comment
<p>Response: The RC SDT thanks you for your comment. Adverse Reliability Impacts is already a defined term that the RC SDT is proposing to revise. IROL is a limit, while ARI is the impact of events. ARI will not replace IROL.</p>		
Northwest LSE Group	Yes	
Bonneville Power Administration	Yes	
Midwest ISO Standards Collaborators	Yes	
Liberty Electric Power LLC	Yes	
WECC Reliability Coordinator	Yes	
PacifiCorp	Yes	
Calpine Corporation	Yes	
Western Area Power Administration	Yes	
Southern Company	Yes	
ReliabilityFirst Corporation	Yes	
American Electric Power	Yes	

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Organization	Yes or No	Question 7 Comment
Manitoba Hydro	Yes	
Georgia Transmission Corporation	Yes	
Illinois Municipal Electric Agency	Yes	
Duke Energy	Yes	
MRO NSRS	Yes	
Xcel Energy	Yes	
American Transmission Company	Yes	

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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.

Summary Consideration: Stakeholders generally agreed with the revisions to the requirements. Several stakeholders suggested adding the words “an issued” before “directive in R3. The RC SDT agreed and made the change. No further revisions were made to the requirements.

Organization	Yes or No	Question 8 Comment
Northwest LSE Group	No	<p>To reduce the compliance burden on smaller entities that would never receive a Reliability Coordinator directive and reduce needless Regional Entity auditing, it would be most helpful to require the RC to publish its list of entities responsible for receiving reliability directives.</p> <p>Also, any Registered Entity should be able to request copies of digital audio recordings or transcripts of the audio recordings if available from the RC.</p>
<p>Response: The RC SDT thanks you for your comment. An RC may issue a directive to any registered entity within its footprint. The burden of compliance is assigned by the NERC registration process and is outside of the scope of this drafting team.</p> <p>The requirements of IRO-001 do not preclude an entity from requesting copies of digital audio recordings or transcripts from the RC.</p>		
Northeast Power Coordinating Council	No	<p>Add “an issued” to the wording as shown following: The Each Transmission Operator, Balancing Authority, Generator Operator, Transmission Service Provider, Load-Serving Entity, Distribution Provider, and/or Purchasing-Selling Entity shall immediately confirm the ability to comply with the directive or inform the its Reliability Coordinator upon recognition of its inability to perform the issued directive.</p>
<p>Response: The RC SDT thanks you for your comment. The RC SDT agrees and has added “an issued” before directive. We have also changed directive to Reliability Directive and included the definition at the beginning of IRO-001 and COM-002</p> <p>Reliability Directive: A communication initiated by a Reliability Coordinator, Transmission Operator or Balancing Authority where action by the recipient is necessary to address an actual or expected Emergency.</p>		
SERC OC Standards Review Group	No	<p>If R2 of IRO-001-1 is retired, what process is in place to ensure that reliability plans are kept up to date and are reviewed to approve footprint changes?</p>
<p>Response: The RC SDT thanks you for your comment. As stated in the posted implementation of IRO-001, this is covered in NERC Rules of Procedure, Section 503, item 2.2:</p>		

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Organization	Yes or No	Question 8 Comment
<p>“Regional entities shall verify that all balancing authorities and transmission operators are under the responsibility of a reliability coordinator”. The RC SDT proposed retiring R2 and R5 as the regional reliability plan is a “how” document that shows how an RC will comply with all other NERC Standards, making this requirement redundant.</p>		
FirstEnergy	No	<p>Regarding the retirement of IRO-001-1 R7 We are not convinced that this requirement is redundant with IRO-014-1 R1. The existing requirement requires the RC to "have clear, comprehensive coordination agreements with adjacent RCs to ensure that SOL or IROL violation mitigation requiring actions in adjacent RC areas are coordinated". IRO-014-1 R1 requires agreements for coordination of actions between RCs to support Interconnection reliability, but it does not specifically require "clear" and "comprehensive" agreements to mitigate SOL or IROL violations. For IRO-001-1 R7 to be properly retired, the "mitigation of SOL and IROL violations" should be explicitly stated in IRO-014-2 R1 as one of the items to be addressed in the RC's Operating Procedure, Process, or Plan.</p>
<p>Response: The RC SDT thanks you for your comment. The RC SDT believes that R1.6 of IRO-014-2 addresses your concern as the procedures, processes or plans include:</p> <p style="padding-left: 40px;">Authority to act to prevent and mitigate conditions which could cause Adverse Reliability Impacts to other Reliability Coordinator Areas.</p> <p>The definitions of each are:</p> <p>IROL: A System Operating Limit that, if violated, could lead to instability, uncontrolled separation, or Cascading Outages that adversely impact the reliability of the Bulk Electric System.</p> <p>Adverse Reliability Impacts: The impact of an event that results in Bulk Electric System instability; uncontrolled separation or Cascading.</p>		
Midwest ISO Standards Collaborators	No	<p>We agree with many of the changes. However, we believe R5 is not necessary for reliability. We agree 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.</p>
<p>Response: The RC SDT thanks you for your comment. The RC SDT concurs that Adverse Reliability Impacts will not result from an RC not notifying impacted entities when a problem has been mitigated. However, impacted entities may have taken actions when the problem arose. These entities need to be informed that the problem has been mitigated so that they can return to normal operations. R5 notifies entities when the system is in a stable state and facilitates Interpersonal Communication between entities.</p>		
Liberty Electric Power LLC	No	<p>Similar objection to COM-002-3: There should be a requirement to the RC to declare the nature of the directive, emergency or economic.</p>
<p>Response: The RC SDT thanks you for your comment. The reliability standards do not address economic issues. The RC SDT has developed a</p>		

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Organization	Yes or No	Question 8 Comment
<p>proposed definition of Reliability Directive that should address your concern.</p> <p>Reliability Directive: A communication initiated by a Reliability Coordinator, Transmission Operator or Balancing Authority where action by the recipient is necessary to address an actual or expected Emergency.</p>		
Manitoba Hydro	No	R5 does not make sense as it doesn't create an adverse reliability impact should the RC fail to notify impacted entities.
<p>Response: The RC SDT thanks you for your comment. The RC SDT concurs that Adverse Reliability Impacts will not result from an RC not notifying impacted entities when a problem has been mitigated. However, impacted entities may have taken actions when the problem arose. These entities need to be informed that the problem has been mitigated so that they can return to normal operations. R5 let's entities know when the system is in a stable state and facilitates Interpersonal Communication between entities.</p>		
Illinois Municipal Electric Agency	No	<p>IMEA supports the comments submitted by the MISO Standards Collaboration Group.</p> <p>In addition, while we agree with the proposed revisions to IRO-001-2 R2, IMEA recommends (as indicated in our comments to Question 4) that a reference be made to COM-002-3 R1 in IRO-001-2 R2. By including this reference, it is understood the applicable entities successfully repeated the directive in order to comply with the directive.</p>
<p>Response: The RC SDT thanks you for your comment. The RC SDT concurs that Adverse Reliability Impacts will not result from an RC not notifying impacted entities when a problem has been mitigated. However, impacted entities may have taken actions when the problem arose. These entities need to be informed that the problem has been mitigated so that they can return to normal operations. R5 notifies entities when the system is in a stable state and facilitates Interpersonal Communication between entities.</p> <p>We have included our proposed definition of Reliability Directive in both COM-002 and IRO-001 and used the term in the appropriate requirements. This will provide the linkage you suggest.</p>		
Hydro-Québec TransEnergie (HQT)	No	Add "an issued" to the wording as shown following: Each Transmission Operator, Balancing Authority, Generator Operator, Transmission Service Provider, Load-Serving Entity, Distribution Provider, and Purchasing-Selling Entity shall inform its Reliability Coordinator upon recognition of its inability to perform "an issued" directive.
<p>Response: The RC SDT thanks you for your comment. The RC SDT agrees and has added "an issued" before directive. We have also changed directive to Reliability Directive and included the definition at the beginning of IRO-001 and COM-002.</p> <p>Reliability Directive: A communication initiated by a Reliability Coordinator, Transmission Operator or Balancing Authority where action by the recipient is necessary to address an actual or expected Emergency.</p>		
Northeast Utilities	No	The intent of R3 is not clear - i.e., " shall inform its Reliability Coordinator upon recognition of its inability to perform a directive". Does this requirement pre-suppose a directive has been given? Suggest adding clarifying language that

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Organization	Yes or No	Question 8 Comment
		indicates that the requirement is applicable subsequent to a directive being received. It is our belief that the wording of Measure M3 supports the suggested changes to R3.
<p>Response: The RC SDT thanks you for your comment. R3 has been revised to add clarity per your comment:</p>		
<p>R3. Each Transmission Operator, Balancing Authority, Generator Operator, Transmission Service Provider, Load-Serving Entity, Distribution Provider, and Purchasing-Selling Entity shall inform its Reliability Coordinator upon recognition of its inability to perform an issued Reliability Directive. <i>[Violation Risk Factor: High] [Time Horizon: Real-time Operations and Same Day Operations]</i></p>		
Independent Electricity System Operator	No	Comments: Change “inability to perform a directive.” to “inability to perform an issued directive.”
<p>Response: The RC SDT thanks you for your comment. The RC SDT agrees and has added “an issued” before directive. We have also changed directive to Reliability Directive and included the definition at the beginning of IRO-001 and COM-002.</p>		
<p>Reliability Directive: A communication initiated by a Reliability Coordinator, Transmission Operator or Balancing Authority where action by the recipient is necessary to address an actual or expected Emergency</p>		
MRO NSRS	No	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.
<p>Response: The RC SDT thanks you for your comment. The RC SDT concurs that Adverse Reliability Impacts will not result from an RC not notifying impacted entities when a problem has been mitigated. However, impacted entities may have taken actions when the problem arose. These entities need to be informed that the problem has been mitigated so that they can return to normal operations. R5 notifies entities when the system is in a stable state and facilitates Interpersonal Communication between entities.</p>		
Xcel Energy	No	R6 – while this requirement has merits, it does not appear to fall under the stated purpose of the standard “To establish requirements for issuance of and complying with Reliability Coordinator directives or notification within the Reliability Coordinator Areas.”. Either the purpose should be modified or this requirement should be placed in a more appropriate location, e.g. IRO-002-2 (along with R8).
<p>Response: The RC SDT thanks you for your comment. The RC SDT moved this requirement into IRO-001 from IRO-002 rather than have a single requirement standard.</p>		

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Organization	Yes or No	Question 8 Comment
Western Area Power Administration	Yes	Suggest changing the word "complying" to "compliance" in the purpose statement.
Response: The RC SDT thanks you for your comment. The RC SDT had made the suggested edit.		
Bonneville Power Administration	Yes	
WECC Reliability Coordinator	Yes	
PacifiCorp	Yes	
Calpine Corporation	Yes	
Southern Company	Yes	
ReliabilityFirst Corporation	Yes	
American Electric Power	Yes	
Georgia Transmission Corporation	Yes	
Duke Energy	Yes	
American Transmission Company	Yes	

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.

Summary Consideration: Stakeholders agreed with the measures for IRO-001-2. The measure M3 was revised to reflect the revision to R3 and the word, “directive” was changed to the defined term, “Reliability Directive” in M1 through M3. No other revisions were suggested for the measures.

Organization	Yes or No	Question 9 Comment
Northwest LSE Group	No	Only in making the Measures agree with the suggested changes to the requirements above.
Response: The RC SDT thanks you for your comment. The measures were revised as appropriate to reflect revisions to the requirements.		
SERC OC Standards Review Group	No	The measures should indicate how long records should be kept to verify compliance with the requirements.
Response: The RC SDT thanks you for your comment. This is covered in the Data Retention section of the Standard.		
Midwest ISO Standards Collaborators	No	Measurement 5 needs to be struck if R5 is struck per question 8.
Response: The RC SDT thanks you for your comment. The RC SDT retained R5 and M5. Please see discussion above in Q8.		
Manitoba Hydro	No	Measure for R5 would need to be struck should R5 be struck as per question 8.
Response: The RC SDT thanks you for your comment. The RC SDT retained R5 and M5. Please see discussion above in Q8.		
Illinois Municipal Electric Agency	No	IMEA supports the comments submitted by the MISO Standards Collaboration Group.
Response: The RC SDT thanks you for your comment. The RC SDT retained R5 and M5. Please see discussion above in Q8.		

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Organization	Yes or No	Question 9 Comment
MRO NSRS	No	Measurement 5 needs to be struck if R5 is struck per question 8.
Response: The RC SDT thanks you for your comment. The RC SDT retained R5 and M5. Please see discussion above in Q8.		
Northeast Power Coordinating Council	Yes	
Bonneville Power Administration	Yes	
FirstEnergy	Yes	
IRC Standards Review Committee	Yes	
Liberty Electric Power LLC	Yes	
WECC Reliability Coordinator	Yes	
PacifiCorp	Yes	
Calpine Corporation	Yes	
Western Area Power Administration	Yes	
Southern Company	Yes	
ReliabilityFirst	Yes	

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Organization	Yes or No	Question 9 Comment
Corporation		
American Electric Power	Yes	
Georgia Transmission Corporation	Yes	
Hydro-Québec TransEnergie (HQT)	Yes	
Duke Energy	Yes	
Northeast Utilities	Yes	
Independent Electricity System Operator	Yes	
American Transmission Company	Yes	

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.

Summary Consideration: Several stakeholders suggested revisions to the VSLs for R4 and R5. The RC SDT concurs that improvements are warranted for the VSLs for R4 and R5. The VSLs have been changed accordingly. The VSL for R3 was revised to add the word “issued” before Reliability Directive to match the revised requirement. The VSLs for R4 and R5 were modified to clarify that if the responsible entity did not notify any others, then this is a Severe VSL.

Organization	Yes or No	Question 10 Comment
Northwest LSE Group	No	Only in making the Measures agree with the suggested changes to the requirements above.
Response: The RC SDT thanks you for your comment. The measures were revised to reflect changes to the requirements as necessary.		
Northeast Power Coordinating Council	No	(i) R4: Since failing to issue an alert to 3 entities already attracts a “High” VSL, not doing so for ANY (i.e. failing to issue an alert to all entities) or more than three should attract a “Severe” VSL. We suggest to change the High VSL to: “failed to issue an alert to three, but not all, impacted”. and the Severe VSL to: “failed to issue an alert to any or more than three impacted Transmission Operators and Balancing Authorities in its Reliability Coordinator Area. Some examples may help to make our intent clearer: If there were 3 BAs, TOPs etc. and none were alerted, this would be a “Severe” violation. If there were 6 BAs, TOPs etc. and 3 were not alerted, this would be a “High” violation. In this last case, if 4 BAs, TOPs etc. were not alerted, this would be a “Severe” violation. (ii) (ii) R5: Similar changes as in R4 should also apply to High and Severe in R5.
Response: The RC SDT thanks you for your comment. We concur that improvements are warranted for the VSLs for R4 and R5. The VSLs have been revised per your suggestion accordingly.		
Midwest ISO Standards Collaborators	No	The Commission stated in their order on VSLs in June of 2008 their preference for as many VSLs as possible. We believe 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.
Response: The RC SDT thanks you for your comment. The VSL for R1 was revised as recommended. There is not a Moderate VSL for R2.		
Liberty Electric Power LLC	No	The VSL's have a "Severe" VSL attached to a GO who fails to inform the RC when the Go becomes aware it is are unable to fully comply with a directive. However, the RC failing to inform two TO's - who potentially could have many

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Organization	Yes or No	Question 10 Comment
		GOs supplying power to their systems - of an emergency is only a "Moderate" VSL.
Response: The RC SDT thanks you for your comment. The VSLs for R4 and R5 have been revised to more closely fit the intent of the requirements.		
E.ON U.S.	No	E.ON U.S. suggests that the VSL for R4 should be binary with the Severe VSL for failing to notify all entities as per R4. Partially meeting R4 is not consistent with the language in R4. E.ON U.S. also suggests that the VSL for R5 should be binary with the Severe VSL for failing to notify all entities as per R5. Partially meeting R5 is not consistent with the language in R5 but the reliability impact of partially meeting R5 is low.
Response: The RC SDT thanks you for your comment. The requirements R4 and R5 are not binary in nature and therefore do not meet the VSL guideline for binary. We have revised the High and Severe VSLs for R4 and R5 (see comment of NPCC above).		
Manitoba Hydro	No	Believe 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.
Response: The RC SDT thanks you for your comment. We concur with your suggestion to split the single VSL into two separate VSLs, one addressing prevention and one mitigation. The VSLs for R1 have been changed accordingly.		
Illinois Municipal Electric Agency	No	IMEA supports the comments submitted by the MISO Standards Collaboration Group.
Response: The RC SDT thanks you for your comment. Please review the response to MISO SCG comments.		
Hydro-Québec TransEnergie (HQT)	No	<p>(i) R4: Since failing to issue an alert to 3 entities already attracts a "High" VSL, not doing so for ANY (i.e. failing to issue an alert to all entities) or more than three should attract a "Severe" VSL. We suggest to change the High VSL to: "failed to issue an alert to three, but not all, impacted". and the Severe VSL to: "failed to issue an alert to any or more than three impacted Transmission Operators and Balancing Authorities in its Reliability Coordinator Area. Some examples may help to make our intent clearer: If there were 3 BAs, TOPs etc. and none were alerted, this would be a "Severe" violation. If there were 6 BAs, TOPs etc. and 3 were not alerted, this would be a "High" violation. In this last case, if 4 BAs, TOPs etc. were not alerted, this would be a "Severe" violation.</p> <p>(ii) R5: Similar changes as in R4 should also apply to High and Severe in R5.</p>
Response: The RC SDT thanks you for your comment. We concur that improvements are warranted for the VSLs for R4 and R5. The VSLs have been		

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Organization	Yes or No	Question 10 Comment
revised as you suggest.		
Northeast Utilities	No	(i) R4: Since failing to issue an alert to 3 entities already attracts a “High” VSL, not doing so for ANY (i.e. failing to issue an alert to all entities) or more than three should attract a “Severe” VSL. We suggest to change the High VSL to: “failed to issue an alert to three, but not all, impacted”. and the Severe VSL to: “failed to issue an alert to any or more than three impacted Transmission Operators and Balancing Authorities in its Reliability Coordinator Area. Some examples may help to make our intent clearer: If there were 3 BAs, TOPs etc. and none were alerted, this would be a “Severe” violation. If there were 6 BAs, TOPs etc. and 3 were not alerted, this would be a “High” violation. In this last case, if 4 BAs, TOPs etc. were not alerted, this would be a “Severe” violation.(ii) R5: Similar changes as in R4 should also apply to High and Severe in R5.
Response: The RC SDT thanks you for your comment. We concur that improvements are warranted for the VSLs for R4 and R5. The VSLs have been revised as you suggested.		
Independent Electricity System Operator	No	(i) R1: For clarity, we suggest changing “it” to “that”.R4: Since failing to issue an alert to 3 entities already attracts a “High” VSL, not doing so for ANY (i.e. failing to issue an alert to all entities) or more than three should attract a “Severe” VSL. We suggest to change the High VSL to: “failed to issue an alert to three, but not all, impacted”. and the Severe VSL to: “failed to issue an alert to any or more than three impacted Transmission Operators and Balancing Authorities in its Reliability Coordinator Area. Some examples may help to make our intent clearer: If there were 3 BAs, TOPs etc. and none were alerted, this would be a “Severe” violation. If there were 6 BAs, TOPs etc. and 3 were not alerted, this would be a “High” violation. In this last case, if 4 BAs, TOPs etc. were not alerted, this would be a “Severe” violation.(ii) R5: Similar changes as in R4 should also apply to High and Severe in R5.
Response: The RC SDT thanks you for your comment. We concur that improvements are warranted for the VSLs for R4 and R5. The VSLs have been revised as you suggested.		
MRO NSRS	No	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.
Response: The RC SDT thanks you for your comment. We concur with your suggestion to split the single VSL into two separate VSLs, one addressing prevention and one mitigation. The VSLs for R1 have been changed accordingly. There is not a Moderate VSL for R2.		

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Organization	Yes or No	Question 10 Comment
SERC OC Standards Review Group	Yes	
Bonneville Power Administration	Yes	
FirstEnergy	Yes	
PacifiCorp	Yes	
Calpine Corporation	Yes	
Western Area Power Administration	Yes	
Southern Company	Yes	
ReliabilityFirst Corporation	Yes	
American Electric Power	Yes	
Georgia Transmission Corporation	Yes	
Duke Energy	Yes	

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.

Summary Consideration: Stakeholders suggested revising R8 to include provisions for avoiding implementing actions that would violate safety, equipment or regulatory or statutory requirements. The RC SDT agreed and added this to the requirement. Other stakeholders suggested adding "For conditions or activities that impact other Reliability Coordinator Areas,..." at the beginning of R1 and R3. The RC SDT agreed and added this to the requirements. The Time Horizons for R2 were revised as suggested to "Same Day Operations and Operations Planning". Several stakeholders expressed concerns regarding having R6-R8 as separate requirements. The intent of R6, R7, and R8 is to handle those things that arise that may not have had a plan identified in advance. The RC SDT contends the requirements are adequate as written.

Organization	Yes or No	Question 11 Comment
Northwest LSE Group		Abstain
Northeast Power Coordinating Council	No	The intents of Requirements R7 and R8 are addressed in R6, and do not add anything. Suggest removing R7 and R8.
<p>Response: The RC SDT thanks you for your comment. The RC SDT developed R5-R8 of IRO-014 from original IRO-016, R1. This was done to eliminate a compound requirement (a requirement that contained multiple separate requirements). Each requirement is different and requires different specific actions. Please see the posted implementation plan for IRO-014 for details.</p> <p>http://www.nerc.com/docs/standards/sar/IRO-014-2_Implementation_Plan_Clean_2009July9.pdf</p>		
SERC OC Standards Review Group	No	Does the STD intend to give a Reliability Coordinator the authority to direct reliability outside their reliability area? This appears to be in conflict with IRO-001.
<p>Response: The RC SDT thanks you for your comment. IRO-014 deals with coordinating plans, processes and procedures ahead of time. The requirements state that RCs will follow these agreed to plans, processes or procedures.</p>		
FirstEnergy	No	See our comments from Questions 8. If IRO-001 R7 is retired and deemed covered by IRO-014 R1, then IRO-014 R1 should include the "mitigation of SOL and IROL violations" as one of the items to be addressed in the RC's Operating Procedure, Process, or Plan.

Organization	Yes or No	Question 11 Comment
<p>Response: The RC SDT thanks you for your comment. Please see response to question 8. The RC SDT did not make any revisions as this issue is covered by R1.6 relating to Adverse Reliability Impacts.</p>		
<p>IRC Standards Review Committee</p>	<p>No</p>	<p>(1) 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, placing the burden on the same RC to obtain the agreement of impacted RCs may not be appropriate since the RC experiencing the Adverse Reliability Impact may not be able to force impacted RC to concur. We suggest the SDT to consider: a. Remove the bullet to require agreement from the impacted RC; b. Add a new requirement that the impacted RC shall 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.</p> <p>(2) We realize that R7 implies that the RC experiencing the Adverse Reliability Impact has come up with an alternative plan when its initial plan was not agreed to, but the alternative may still be disagreed by the impacted RC. Simply implementing the alternative plan, as stipulated in R8, could expose the impacted RC to operate in an unreliable or unsafe domain. We therefore request the SDT to assess if any requirements need to be introduced to resolve this difference with due regard to reliability concerns in both RC areas when agreement cannot be reached even on the alternative plan.</p>
<p>Response: The RC SDT thanks you for your comment.</p> <p>1) R2 deals with procedures, processes and plans identified and developed ahead of time. If the plan of one RC requires action from another RC, the RC SDT feels it is necessary to get agreement from the second RC to take action, otherwise the plan is not a plan that will maintain reliability. The intent of R6, 7, and 8 is to handle those things that arise that may not have had a plan identified in advance. The RC SDT believes the requirements are adequate as written.</p> <p>2) We have modified R8 to allow RCs to avoid implementing actions that violate safety, equipment or regulatory or statutory requirement.</p> <p>R8. Each impacted Reliability Coordinator shall implement the mitigation plan developed by the Reliability Coordinator who has the identified Adverse Reliability Impact when the impacted Reliability Coordinators can not agree on a mitigation plan unless such actions would violate safety, equipment, or regulatory or statutory requirements. . <i>[Violation Risk Factor: Medium][Time Horizon: Operations Planning, Same Day Operations and Real-time Operations</i></p>		
<p>Midwest ISO Standards Collaborators</p>	<p>No</p>	<p>Requirements R2 and R8 need additional work. 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.</p>

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Organization	Yes or No	Question 11 Comment
		<p>Further, the drafting team needs to clarify that R2 also applies to the mitigation plan in R7. Because R7 requires the RC experiencing the Adverse Reliability Impact to develop the mitigation plan, the mitigation plan may not be agreed to by the impacted RC. The impacted RC may have a perfectly valid reliability, statutory, legal, or regulatory reason for not agreeing to the mitigation plan. R8 still obligates the RC to implement the mitigation plan developed in R7 though it may be contrary to reliability. R8 needs to allow the RC to refuse to implement the mitigation plan if the impacted RC has a reliability, statutory, legal or regulatory reason. Further the drafting team should consider if the impacted RC could refuse because the RC experiencing the Adverse Reliability Impact has not implemented comparable measures in their own area. R8 as written could allow an RC to simply pass cost on to the neighboring RC in the name of reliability. For example, the RC may not want to order a unit to be committed to avoid certain startup costs but they ask the neighboring RC to start up a unit in their footprint.</p>
<p>Response: The RC SDT thanks you for your comment.</p> <p>R2 deals with procedures, processes and plans identified and developed ahead of time. If the plan of one RC requires action from another RC, the RC SDT feels it is necessary to get agreement from the second RC to take action, otherwise the plan is not a plan that will maintain reliability. The intent of R6, R7, and R8 is to handle those things that arise that may not have had a plan identified in advance. The RC SDT believes the requirements are adequate as written.</p> <p>R7/R8: We have modified R8 to allow RCs to avoid implementing actions that violate safety, equipment or regulatory or statutory requirement.</p> <p>R8. Each impacted Reliability Coordinator shall implement the mitigation plan developed by the Reliability Coordinator who has the identified Adverse Reliability Impact when the impacted Reliability Coordinators can not agree on a mitigation plan unless such actions would violate safety, equipment, or regulatory or statutory requirements. . <i>[Violation Risk Factor: Medium][Time Horizon: Operations Planning, Same Day Operations and Real-time Operations]</i></p> <p>The second comment deals with economic issues and not with reliability. We cannot address economic issues, but it would be reasonable to expect that plans developed in advance could include equity considerations. Also, it is possible to postulate a scenario where the RC experiencing the Adverse Reliability Impact may not have actions to take that are effective and the other impacted RC could have very effective actions to take and should take them regardless of whether the RC developing the mitigation plan has taken comparable measures in its own area.</p>		
Southern Company	No	<p>IRO-001-1 Requirement 3 states that, “The Reliability Coordinator shall have clear decision-making authority to act and to direct actions to be taken by Transmission Operators, Balancing Authorities, Generator Operators, Transmission Service Providers, Load-Serving Entities, and Purchasing- Selling Entities within its Reliability Coordinator Area to preserve the integrity and reliability of the Bulk Electric System.” This does not give one RC the authority to direct another RC. Requirement 7 and 8 would allow one RC to give a directive to another RC if they disagree. This would allow an RC with bad information to require another RC to carry out a mitigation plan that could degrade system reliability. For example, RC1 identifies a possible SOL violation in RC2s reliability area due to RC1s generation pattern. RC1 and RC2 can’t agree that there is a problem. In order to mitigate the SOL a mitigation plan is developed by RC1 that requires RC2 to redispatch generation and reconfigure transmission in RC2’s area so that the generation and transmission in RC1’s area won’t have</p>

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Organization	Yes or No	Question 11 Comment
		<p>to be redispached or reconfigured. Suggested rewording of R7 and R8</p> <p>R7. When Reliability Coordinators can not agree that a problem exists a mitigation plan will be developed by each Reliability Coordinator that will restore system reliability in their respective reliability areas. [Violation Risk Factor: Medium][Time Horizon: Operations Planning, Same Day Operations and Real-time Operations]</p> <p>R8. Each impacted Reliability Coordinator shall implement the mitigation plan developed to relieve the identified Adverse Reliability Impact in their reliability area when the impacted Reliability Coordinators can not agree that a problem exists. [Violation Risk Factor: Medium][Time Horizon: Operations Planning, Same Day Operations and Real-time Operations]</p>
<p>Response: The RC SDT thanks you for your comment. IRO-014 deals with coordinating plans, processes and procedures ahead of time. The requirements state that RCs will follow these plans processes or procedures. We have modified R8 to allow RCs to avoid implementing actions that violate safety, equipment or regulatory or statutory requirement. The intent of R6, R7, and R8 is to handle those things that arise that may not have had a plan identified in advance.</p> <p>R8. Each impacted Reliability Coordinator shall implement the mitigation plan developed by the Reliability Coordinator who has the identified Adverse Reliability Impact when the impacted Reliability Coordinators can not agree on a mitigation plan unless such actions would violate safety, equipment, or regulatory or statutory requirements. . [Violation Risk Factor: Medium][Time Horizon: Operations Planning, Same Day Operations and Real-time Operations]</p>		
Manitoba Hydro	No	<p>Requirements R2 and R8 need additional work. 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.</p> <p>Further, the drafting team needs to clarify that R2 also applies to the mitigation plan in R7. Because R7 requires the RC experiencing the Adverse Reliability Impact to develop the mitigation plan, the mitigation plan may not be agreed to by the impacted RC. The impacted RC may have a perfectly valid reliability, statutory, legal, or regulatory reason for not agreeing to the mitigation plan. R8 still obligates the RC to implement the mitigation plan developed in R7 though it may be contrary to reliability. R8 needs to allow the RC to refuse to implement the mitigation plan if the impacted RC has a reliability, statutory, legal or regulatory reason. Further the drafting team should consider if the impacted RC could refuse because the RC experiencing the Adverse Reliability Impact has not implemented comparable measures in their own area. R8 as written could allow an RC to simply pass cost on to the neighboring RC in the name of reliability. For example, the RC may not want to order a unit to be committed to avoid certain startup costs but they ask the neighboring RC to start up a unit in their footprint.</p>

Organization	Yes or No	Question 11 Comment
<p>Response: The RC SDT thanks you for your comment.</p> <p>R2 deals with procedures, processes and plans identified and developed ahead of time. If the plan of one RC requires action from another RC, the RC SDT feels it is necessary to get agreement from the second RC to take action, otherwise the plan is not a plan that will maintain reliability. The intent of R6, R7, and R8 is to handle those things that arise that may not have had a plan identified in advance. The RC SDT contends the requirements are adequate as written.</p> <p>R8: We have modified R8 to allow RCs to avoid implementing actions that violate safety, equipment or regulatory or statutory requirement.</p> <p>R8. Each impacted Reliability Coordinator shall implement the mitigation plan developed by the Reliability Coordinator who has the identified Adverse Reliability Impact when the impacted Reliability Coordinators can not agree on a mitigation plan unless such actions would violate safety, equipment, or regulatory or statutory requirements. . <i>[Violation Risk Factor: Medium][Time Horizon: Operations Planning, Same Day Operations and Real-time Operations]</i></p> <p>The second comment deals with economic issues and not with reliability. We cannot address economic issues, but it would be reasonable to expect that plans developed in advance could include equity considerations. Also, it is possible to postulate a scenario where the RC experiencing the Adverse Reliability Impact may not have actions to take that are effective and the other impacted RC could have very effective actions to take and should take them regardless of whether the RC developing the mitigation plan has taken comparable measures in its own area.</p>		
Hydro-Québec TransEnergie (HQT)	No	The intents of Requirements R7 and R8 are addressed in R6, and do not add anything. Suggest removing R7 and R8.
<p>Response: The RC SDT thanks you for your comment. The RC SDT developed R5-R8 of IRO-014 from original IRO-016, R1. This was done to eliminate a compound requirement. Each requirement is different and requires different specific actions. Please see the posted implementation plan for IRO-014 for details.</p> <p>http://www.nerc.com/docs/standards/sar/IRO-014-2_Implementation_Plan_Clean_2009July9.pdf</p>		
Duke Energy	No	<p>R1 introduces the concept of “impacted Reliability Coordinators” which is unclear. Revise R1 as follows: R1. For conditions or activities that may impact other Reliability Coordinator Areas, each Reliability Coordinator shall have Operating Procedures, Processes, or Plans for notification, exchange of information or coordination of actions with those impacted Reliability Coordinators to support Interconnection reliability. These Operating Procedures, Processes, or Plans shall collectively address the following:</p> <p>R2 Time Horizon should not include Long-term Planning.</p> <p>R3 is unclear. Revise R3 as follows:R3. For conditions or activities that may impact other Reliability Coordinator Areas, each Reliability Coordinator shall make notifications and exchange reliability-related information with those impacted Reliability Coordinators using its predefined Operating Procedures, Processes, or Plans, or other available means to</p>

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Organization	Yes or No	Question 11 Comment
		<p>accomplish the notifications and exchange of reliability-related information.</p> <p>R4 could be interpreted to require a weekly conference call even if there is no need for a call. Revise R4 as follows:R4. When there are conditions or activities that may impact other Reliability Coordinator areas, each Reliability coordinator shall participate in agreed upon conference calls, at least weekly, and other communication forums with those impacted Reliability Coordinators.”</p> <p>R5 “ Insert the word “all” before impacted Reliability Coordinators for clarity.”</p> <p>R6, R7 and R8 are interrelated and unclear. Combine these three requirements into one clear requirement as follows:</p> <p>R6. When the identified Adverse Reliability Impact cannot be agreed to by the impacted Reliability Coordinators, the Reliability Coordinator with the identified Adverse Reliability Impact shall develop a mitigation plan and each impacted Reliability Coordinator shall implement the plan.</p>
<p>Response: The RC SDT thanks you for your comment.</p> <p>R1: We have revised R1 to include the phrase “For conditions or activities that impact other Reliability Coordinator Areas,...” We removed the word “may” to tighten up the requirement.</p> <p>R2: The RC SDT removed Long term Planning and revised the Time Horizon of R2 to match that of R1: <i>Same Day Operations and Operations Planning</i></p> <p>R3: We have revised R3 to include the phrase “For conditions or activities that impact other Reliability Coordinator Areas,...” We removed the word “may” to tighten up the requirement.</p> <p>R4: The collective experience of the RC SDT members indicates a clear need to have at least weekly conference calls among impacted Reliability Coordinators among impacted Reliability Coordinators.</p> <p>R5: The RC SDT agrees and added the word “all” as suggested.</p> <p>R6-8: These requirements were developed from IRO-016, R1 which was a compound requirement (it contained multiple requirements for different actions in a single requirement). The RC SDT separated these into distinct requirements for clarity and measurability.</p>		
Northeast Utilities	No	The intents of Requirements R7 and R8 are addressed in R6, and do not add anything. Suggest removing R7 and R8.
<p>Response: The RC SDT thanks you for your comment. The RC SDT developed R5-R8 of IRO-014 from original IRO-016, R1. This was done to eliminate a compound requirement (it contained multiple requirements for different actions in a single requirement. Each requirement is different and requires different specific actions. Please see the posted implementation plan for IRO-014 for details.</p> <p>http://www.nerc.com/docs/standards/sar/IRO-014-2_Implementation_Plan_Clean_2009July9.pdf</p>		

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Organization	Yes or No	Question 11 Comment
Independent Electricity System Operator	No	<p>(i) Definition of Adverse Reliability Impact is duplicated as it is already defined in IRO-001-2</p> <p>(ii) We do not see the need for R7 and R8 since R6 already stipulates the necessary actions to be taken, it is not necessary for the Reliability Coordinator with the identified Adverse Reliability Impact to develop (re-develop?) a mitigation plan when the impacted Reliability Coordinators did not agree that the problem exists. What may be needed is the insertion of “shall develop a mitigation plan” before “notify impacted Reliability Coordinators” in R5. We suggest removing these requirements (R7 and R8).</p>
<p>Response: The RC SDT thanks you for your comment. i)...The SDT acknowledges that the definition of Adverse Reliability Impact is duplicated in IRO-001-2 and in IRO-014-2. The SDT repeated it in the two standards to facilitate review and consistency. When the standards are approved, the definition will be moved into the NERC Glossary of Terms...only once.</p> <p>ii) The RC SDT developed R5-R8 of IRO-014 from original IRO-016, R1. This was done to eliminate a compound requirement (it contained multiple requirements for different actions in a single requirement. Each requirement is different and requires different specific actions. Please see the posted implementation plan for IRO-014 for details.</p> <p>http://www.nerc.com/docs/standards/sar/IRO-014-2_Implementation_Plan_Clean_2009July9.pdf</p>		
MRO NSRS	No	<p>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?</p> <p>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.</p> <p>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.</p> <p>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.</p>
<p>Response: The RC SDT thanks you for your comment. Requirement R2 addresses processes, procedures, and plans developed in advance. Such plans reasonably can be expected to contain agreement. The goal is to ensure reliability; refusal to agree based upon equity issues is unacceptable. If inability to agree is based upon differing opinions as to whether the problem exists, then the coordination requirements are out of</p>		

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Organization	Yes or No	Question 11 Comment
<p>compliance. Technical assessments reasonably can be expected to predict the same effects upon the system.</p> <p>The collective experience of the RC SDT members indicates a clear need to have at least weekly conference calls.</p> <p>IRO-014-2 R7 applies to scenarios and coordination between RCs. IRO-001-2 R1 applies to scenarios and coordination between an RC and TOPs, BAs, GOPs, TSPs, LSEs, DPs, and PSEs within its RC Area. The SDT believes it is appropriate to leave both requirements in place.</p> <p>R8: We have modified R8 to allow RCs to avoid implementing actions that violate safety, equipment or regulatory or statutory requirement.</p> <p>R8. Each impacted Reliability Coordinator shall implement the mitigation plan developed by the Reliability Coordinator who has the identified Adverse Reliability Impact when the impacted Reliability Coordinators can not agree on a mitigation plan unless such actions would violate safety, equipment, or regulatory or statutory requirements. . <i>[Violation Risk Factor: Medium][Time Horizon: Operations Planning, Same Day Operations and Real-time Operations</i></p>		
Bonneville Power Administration	Yes	
Liberty Electric Power LLC	Yes	
WECC Reliability Coordinator	Yes	
PacifiCorp	Yes	
Calpine Corporation	Yes	
Western Area Power Administration	Yes	
ReliabilityFirst Corporation	Yes	
American Electric Power		Not applicable.

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Organization	Yes or No	Question 11 Comment
Georgia Transmission Corporation		N/A
Response: The RC SDT thanks you for your comment.		

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.

Summary Consideration: Stakeholders agreed with the Measures, except to make conforming changes for revisions to the requirements (M1, M3 and M8). The RC SDT has revised the measures based on the new requirements. One stakeholder suggested revision to the Data Retention for R5-R8. Data Retention was revised for R5 to 12 months, however the RC SDT believes that three years is the correct period for R6-8.

Organization	Yes or No	Question 12 Comment
Northwest LSE Group		Abstain
Northeast Power Coordinating Council	No	The intents of Measures M7 and M8 are addressed in M6, and do not add anything. Suggest removing M7 and M8.
Response: The RC SDT thanks you for your comment. R7 and R8 were not removed, therefore the measures will remain in place.		
IRC Standards Review Committee	No	Conforming changes to the Measurements will be required if changes as suggested in Question 11 are introduced.
Response: The RC SDT thanks you for your comment. The measures were revised to conform to the revised requirements.		
Midwest ISO Standards Collaborators	No	Conforming changes to the Measurements will be required for accepted changes from question 11.
Manitoba Hydro	No	Conforming changes to the Measurements will be required for accepted changes from question 11.
Response: The RC SDT thanks you for your comment. The measures were revised to conform to the revised requirements.		
Hydro-Québec TransEnergie (HQT)	No	The intents of Measures M7 and M8 are addressed in M6, and do not add anything. Suggest removing M7 and M8.

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Organization	Yes or No	Question 12 Comment
Response: The RC SDT thanks you for your comment. R7 and R8 were not removed, therefore the measures will remain in place		
Duke Energy	No	Need to revise the Measures to coincide with the recommended changes to the requirements in #11 above. Also under Data Retention, 12 months of evidence is needed for R3, R4 and M3, M4. However 3 years plus the current year is required for R5 through R8 and M5 through M8. We see no reason the data requirements to be different and believe 12 months is the proper amount of data retention.
Response: The RC SDT thanks you for your comment. The measures were revised to conform to the revised requirements. The RC SDT concurs with the suggested revision to Data Retention for R5. The infrequency of occurrences of R6-8 clearly support a 3 year retention period.		
Northeast Utilities	No	The intents of Measures M7 and M8 are addressed in M6, and do not add anything. Suggest removing M7 and M8.
Response: The RC SDT thanks you for your comment. R7 and R8 were not removed, therefore the measures will remain in place		
Independent Electricity System Operator	No	Depending on the response of the SDT, changes to M5 to M8 may be required.
Response: The RC SDT thanks you for your comment. The measures were revised to conform to the revised requirements		
MRO NSRS	No	Conforming changes to the Measurements will be required for accepted changes from question 11.
Response: The RC SDT thanks you for your comment. The measures were revised to conform to the revised requirements		
SERC OC Standards Review Group	Yes	
Bonneville Power Administration	Yes	
FirstEnergy	Yes	
Liberty Electric Power LLC	Yes	

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Organization	Yes or No	Question 12 Comment
WECC Reliability Coordinator	Yes	
PacifiCorp	Yes	
Calpine Corporation	Yes	
Western Area Power Administration	Yes	
Southern Company	Yes	
ReliabilityFirst Corporation	Yes	
American Electric Power		Not applicable.
Georgia Transmission Corporation		N/A

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.

Summary Consideration: Several stakeholders suggested developing four VSLs for R5. Typically, in the course of BES operations, impacted Reliability Coordinators will be a small number. The SDT effort in this regard, was to write the VSLs to represent both the large and small scenario containing an Adverse Reliability Impact. The essence of the severe VSL is that the RC did not notify any (as in no one) impacted RC's. As such, it should be severe. The essence of the moderate VSL is that the RC notified one other RC, however did not notify the remaining impacted RC's. The SDT felt the VSL's appropriately addressed the large and small scenarios. Other stakeholders suggested four VSLs for R4. The essence of R4 is written to require impacted RC's to talk at least weekly and is singular in nature. VSL's can not be written for conference calls that exceed the singular requirement.

Organization	Yes or No	Question 13 Comment
Northwest LSE Group		Abstain
Northeast Power Coordinating Council	No	(i) Arguably, all four VSLs could be developed as opposed to just having the Moderate and Severe, if the VSLs are graded according to the number of impacted RCs that need to be notified. For example, Low for missing one, Moderate for missing two, High for missing three, Severe for missing four or more. (ii) We do not have any issue with the binary nature of the VSLs for R6, R7 and R8, but they may need to be revised (wording change and/or removal) depending on the SDT's response to our comments under Q11.
<p>Response: The RC SDT thanks you for your comment. Typically, in the course of BES operations, impacted Reliability Coordinators will be a small number. The SDT effort in this regard, was to write the VSLs to represent both the large and small scenario containing an Adverse Reliability Impact. The essence of the severe VSL is that the RC did not notify any (as in no one) impacted RC's. As such, it should be severe. The essence of the moderate VSL is that the RC notified one other RC, however did not notify the remaining impacted RC's. The SDT felt the VSL's appropriately addressed the large and small scenarios.</p> <p>The RC SDT developed R5-R8 of IRO-014 from original IRO-016, R1. This was done to eliminate a compound requirement (a single requirement that contained multiple requirements). Each requirement is different and requires different specific actions. Please see the posted implementation plan for IRO-014 for details; as such, the VSL's remain.</p>		
IRC Standards Review Committee	No	(1) In the Commission's June 2008 order on VSLs, they expressed their preference for having as many VSLs as possible. We believe 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

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Organization	Yes or No	Question 13 Comment
		<p>one conference call does not represent distinct violations but a single violation.</p> <p>(2) 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. Note: CAISO abstains from these comments.</p>
<p>Response: The RC SDT thanks you for your comment.</p> <p>1) The Commission’s June 2008 stated a preference for as many as possible, however the SDT believes the essence of this statement was to write multiple VSLs only where appropriate, not to do so simply because it is possible. Further, the essence of R4 is written to require impacted RC’s to talk at least weekly and is singular in nature. VSL’s can not be written for conference calls that exceed the singular requirement.</p> <p>2) Typically, in the course of BES operations, impacted Reliability Coordinators will be a small number. The SDT effort in this regard, was to write the VSLs to represent both the large and small scenario containing an Adverse Reliability Impact. The essence of the severe VSL is that the RC did not notify any (as in no one) impacted RC’s. As such, it should be severe. The essence of the moderate VSL is that the RC notified one other RC, however did not notify the remaining impacted RC’s. The SDT felt the VSL’s appropriately addressed the large and small scenarios.</p>		
Midwest ISO Standards Collaborators	No	<p>In the Commission’s June 2008 order on VSLs, they expressed their preference for having as many VSLs as possible. We believe 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.</p> <p>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.</p>
<p>Response: The RC SDT thanks you for your comment. The Commission’s June 2008 stated a preference for as many as possible, however the SDT believes the essence of this statement was to write multiple VSLs only where appropriate, not to do so simply because it is possible. Further, the essence of R4 is that it is written to require impacted RC’s to talk at least weekly and is singular in nature. VSL’s can not be written for conference calls that exceed the singular requirement.</p> <p>Typically, in the course of BES operations, impacted Reliability Coordinators will be a small number. The SDT effort in this regard, was to write the VSL to represent both the large and small scenario containing an Adverse Reliability Impact. The essence of the severe VSL is that the RC did not notify any (as in no one) impacted RC’s. As such, it should be severe. The essence of the moderate VSL is that the RC notified one other RC, however did not notify the remaining impacted RC’s. The SDT felt the VSL’s appropriately addressed the large and small scenarios.</p>		
Southern Company	No	Reliability problems identified in other reliability areas are based on modeling information obtained from another reliability region. The fact that one RC will not agree that the model of an adjacent RC’s reliability area may be more accurate than their model of the adjacent reliability area is no reason to impose a severe violation on the RC with the more accurate

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Organization	Yes or No	Question 13 Comment
		<p>model of their own reliability region.</p> <p>Example: RC1 identifies a contingency overload of a transformer bank in an adjacent reliability area. The transformer bank was replaced the week before with a larger bank. When RC1 contacts RC2, RC2 explains that the bank overload is not valid because of the replacement. RC2 does not identify a problem due to the fact that the model RC2 is using has been updated with the new transformer bank. RC1 will not agree and requires RC2 to open a tie line with another reliability area to relieve the contingency overload. If RC2 does not follow the instructions of RC1, making the interconnection weaker to relieve a problem that does not exist, RC2 is out of compliance and a severe violation will be imposed.</p>
<p>Response: The RC SDT thanks you for your comment. The scenario you describe is essentially a modeling problem, as such the discrepancy would be vetted and corrected during the discovery phase. Further, an RC1 cannot tell RC2 how to rate facilities owned by entities within the RC2 area. The SDT believes that your scenario would play out like this: RC1 calls RC2 and says, “we show an overload on transformer bank X.” RC2 says, “we do not, what rating are you using?” RC1 replies with the old rating, RC2 states that it is wrong, and here is the correct rating, which RC1 implements, problem solved. RC1 cannot come back and say the rating that you have for transformer bank X is incorrect. Each entity within the RC Area (TO or GO) is responsible for the rating of the facilities it owns. (Taking the scenario even farther, if RC1 believes that the TO or GO has an incorrect rating, then RC1 can challenge the rating methodology of that TO or GO under the FAC standards.)</p>		
Manitoba Hydro	No	<p>Believe that four VSLs could be written for R4 based on the number of conference calls that are participated in. 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.</p>
<p>Response: The RC SDT thanks you for your comment. In regards to R4: The essence of R4 is that it is written to require impacted RC’s to talk at least weekly and is singular in nature. VSL’s can not be written for conference calls that exceed the singular requirement.</p> <p>In regards to R5: Typically, in the course of BES operations, impacted Reliability Coordinators will be a small number. The SDT effort in this regard, was to write the VSL to represent a typical scenario containing an Adverse Reliability Impact. The essence of the severe VSL is that the RC did not notify any (as in no one) impacted RC’s. As such, it should be severe. The essence of the moderate VSL is that the RC notified one other RC, however did not notify the remaining impacted RC’s.</p>		
Hydro-Québec TransÉnergie (HQT)	No	<p>(i) Arguably, all four VSLs could be developed as opposed to just having the Moderate and Severe, if the VSLs are graded according to the number of impacted RCs that need to be notified. For example, Low for missing one, Moderate for missing two, High for missing three, Severe for missing four or more.</p> <p>(ii) We do not have any issue with the binary nature of the VSLs for R6, R7 and R8, but they may need to be revised (wording change and/or removal) depending on the SDT’s response to our comments under Q11.</p>
<p>Response: The RC SDT thanks you for your comment. Typically, in the course of BES operations, impacted Reliability Coordinators will be a</p>		

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Organization	Yes or No	Question 13 Comment
<p>small number. The SDT effort in this regard, was to write the VSL to represent both the large and small scenario containing an Adverse Reliability Impact. The essence of the severe VSL is that the RC did not notify any (as in no one) impacted RC's. As such, it should be severe. The essence of the moderate VSL is that the RC notified one other RC, however did not notify the remaining impacted RC's. The SDT felt the VSL's appropriately addressed the large and small scenarios.</p> <p>The RC SDT developed R5-R8 of IRO-014 from original IRO-016, R1. This was done to eliminate a compound requirement (a single requirement that contained multiple requirements). Each requirement is different and requires different specific actions. Please see the posted implementation plan for IRO-014 for details; as such, the VSL's remain.</p>		
Duke Energy	No	Need to revise the VSLs to coincide with recommended changes to the requirements in #11 above.
<p>Response: The RC SDT thanks you for your comment. The VSLs were modified to align with changes made to the requirements. Please see the response to #11. The SDT adopted several, but not all of your suggestions.</p>		
Northeast Utilities	No	<p>(i) Arguably, all four VSLs could be developed as opposed to just having the Moderate and Severe, if the VSLs are graded according to the number of impacted RCs that need to be notified. For example, Low for missing one, Moderate for missing two, High for missing three, Severe for missing four or more.(ii) We do not have any issue with the binary nature of the VSLs for R6, R7 and R8, but they may need to be revised (wording change and/or removal) depending on the SDT's response to our comments under Q11.</p>
<p>Response: The RC SDT thanks you for your comment. Typically, in the course of BES operations, impacted Reliability Coordinators will be a small number. The SDT effort in this regard, was to write the VSL to represent both the large and small scenario containing an Adverse Reliability Impact. The essence of the severe VSL is that the RC did not notify any (as in no one) impacted RC's. As such, it should be severe. The essence of the moderate VSL is that the RC notified one other RC, however did not notify the remaining impacted RC's. The SDT felt the VSL's appropriately addressed the large and small scenarios.</p> <p>The RC SDT developed R5-R8 of IRO-014 from original IRO-016, R1. This was done to eliminate a compound requirement (a single requirement that contained multiple requirements). Each requirement is different and requires different specific actions. Please see the posted implementation plan for IRO-014 for details; as such, the VSL's remain.</p>		
Independent Electricity System Operator	No	<p>(i) Arguably, all four VSLs could be developed as opposed to just having the Moderate and Severe if the VSLs are graded according to then number of impacted RCs that need to be notified. For example, Low for missing one, Moderate for missing two, High for missing three, Severe for missing four or more.(ii) We do not have any issue with the binary nature of the VSLs for R6, R7 and R8, but they may need to be revised (wording change and/or removal) depending on the SDT's response to our comments under Q11.</p>
<p>Response: The RC SDT thanks you for your comment. Typically, in the course of BES operations, impacted Reliability Coordinators will be a</p>		

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Organization	Yes or No	Question 13 Comment
<p>small number. The SDT effort in this regard, was to write the VSL to represent both the large and small scenario containing an Adverse Reliability Impact. The essence of the severe VSL is that the RC did not notify any (as in no one) impacted RC's. As such, it should be severe. The essence of the moderate VSL is that the RC notified one other RC, however did not notify the remaining impacted RC's. The SDT felt the VSL's appropriately addressed the large and small scenarios.</p> <p>The RC SDT developed R5-R8 of IRO-014 from original IRO-016, R1. This was done to eliminate a compound requirement (a single requirement that contained multiple requirements). Each requirement is different and requires different specific actions. Please see the posted implementation plan for IRO-014 for details; as such, the VSL's remain.</p>		
MRO NSRS	No	<p>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.</p> <p>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.</p>
<p>Response: The RC SDT thanks you for your comment. The Commission's June 2008 stated a preference for as many as possible, however the SDT believes the essence of this statement was to write multiple VSLs only where appropriate, not to do so simply because it is possible. Further, the essence of R4 is written to require impacted RC's to talk at least weekly and is singular in nature. VSL's can not be written for conference calls that exceed the singular requirement.</p> <p>Typically, in the course of BES operations, impacted Reliability Coordinators will be a small number. The SDT effort in this regard, was to write the VSLs to represent both the large and small scenario containing an Adverse Reliability Impact. The essence of the severe VSL is that the RC did not notify any (as in no one) impacted RC's. As such, it should be severe. The essence of the moderate VSL is that the RC notified one other RC, however did not notify the remaining impacted RC's. The SDT felt the VSL's appropriately addressed the large and small scenarios.</p>		
SERC OC Standards Review Group	Yes	
Bonneville Power Administration	Yes	
FirstEnergy	Yes	

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Organization	Yes or No	Question 13 Comment
Liberty Electric Power LLC	Yes	
WECC Reliability Coordinator	Yes	
PacifiCorp	Yes	
Calpine Corporation	Yes	
Western Area Power Administration	Yes	
ReliabilityFirst Corporation	Yes	
American Electric Power		Not applicable.
Georgia Transmission Corporation		N/A

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.

Summary Consideration: Stakeholders suggested removing the Distribution provider and Generator Operator from the Data Retention section for R1 of COM-001. Since these are not applicable entities in R1, they were removed from Data Retention for the requirement.

Organization	Question 14 Comment
Northeast Power Coordinating Council	NPCC appreciates the work of the Drafting Team. No additional comments.
Response: The RC SDT thanks you for your comment.	
SERC OC Standards Review Group	"The comments expressed herein represent a consensus of the views of the above named members of the SERC OC Standards Review group only and should not be construed as the position of SERC Reliability Corporation, its board or its officers."
Response: The RC SDT thanks you for your comment.	
Bonneville Power Administration	<p>Issue #2: Data Retention Why would the Distribution Provider and Generator Operator be required to store historical data (three years in the case of Requirement R1 and Measure M1; twelve months in the case of Requirement R2 and Measure M2) to show that these requirements and measures have been successfully implemented when these two entities (Distribution Provider and Generator Operator) aren't even included either in Requirements R1 and R2 or in Measure M1 and M2?It would appear that they should only have to provide historical data for three months as required by the data retention time for Requirement 3 and Measure 3.</p> <p>Issue #1: Data Retention: The first bullet in this section states that all entities are responsible for retaining documents associated with all Requirements and Measures associated with this standard. In reality, Requirements R1, R4, R5 and R6 and the corresponding Measures are the responsibility of the Reliability Coordinator. Requirements R2 and R3 and their corresponding Measures are implemented by the Transmission Operator, Balancing Authority, Generator Operator, Distribution Provider, Transmission Service Provider, Purchasing-Selling Entity and the Load Serving Entity. The Data Retention section should be rewritten to reflect this so that entities are not required to maintain documents that they aren't suppose to even possess in some cases.</p>
Response: The RC SDT thanks you for your comment. COM-001 removed DP and GOP from the data retention section regarding R1 and R2. IRO-001-2 changed "all" to "applicable."	

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Organization	Question 14 Comment
IRC Standards Review Committee	AESO abstains from commenting on VSLs. VSLs for Alberta will be developed by provincial authorities.
Response: The RC SDT thanks you for your comment.	
E.ON U.S.	COM-001-2 R1 and R2 and the associated M1 and M2 are only applicable to the RC, TOP and BA but the “Data Retention” for R1/R2 and M1/M2 require the DP and GOP to retain data for the Requirements and Measures. E.ON U.S. suggests that the requirement for data retention of the DP and GOP be eliminated from the standard.
Response: The RC SDT thanks you for your comment. COM-001 removed DP and GOP from the data retention section regarding R1 and R2.	
Illinois Municipal Electric Agency	In order to minimize the number of reliability standards and the details covered in requirements - particularly those dealing with communications - it is recommended that an up-front provision/requirement be included as part of the compliance registration process that certain functional entities (e.g., DP, LSE, PSE, etc.) shall be responsible for providing the necessary information to transact services and for complying with the directives/requests of certain functional authorities (e.g., BA, PC, RC, etc.) in order to maintain/enhance reliability of the BES.
Response: The RC SDT thanks you for your comment. The registration process is not in the scope of this SDT project	
Northeast Utilities	Northeast Utilities appreciates the work of the Drafting Team. No additional comments.
Response: The RC SDT thanks you for your comment.	
Independent Electricity System Operator	In our comments on the previous posting, we expressed a disagreement with a proposed to remove IRO-005, in particular the latter part of R13, which stipulated that: In instances where there is a difference in derived limits, the Reliability Coordinator and its Transmission Operators, Balancing Authorities, Generator Operators, Transmission Service Providers, Load-Serving Entities, and Purchasing-Selling Entities shall always operate the Bulk Electric System to the most limiting parameter. Our rationale was that The FAC standards cover the methodology used in calculating SOLs and IROLs. Regardless of how these limits are calculated, in practice there always exists the possibility that different entities may come up with SOLs/IROLs, especially of the inter-ties, that could be different. Operating to the lowest SOLs/IROLs when more than one set exists is a necessary requirement for reliable operation. The SDT responded by suggesting that this requirement is redundant with FAC-014 which -014 states the requirement for developing and sharing SOL and IROL between the RC, PA, TP and TOP in both the planning and operating time frames. However, this response fails to address the situation where during operation, the situation of disagreeing SOLs or IROLs does arise. FAC-014 or any other standards do not currently have a requirement to ensure that all entities operate to the lower limit before the difference is resolved. This leaves room for unreliable operation. We suggest the SDT to consider restating this requirement somewhere. Note that this requirement is similar to R6 of IRO-014

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Organization	Question 14 Comment
	that when in doubt, the more conservative approach should be taken. If it is necessary to have an R6 to deal with an uncertain identification/notification of an Adverse Reliability Impact, we don't see why it is not necessary to operate to a lower SOL or IROL when there is an unresolved difference.
Response: The RC SDT thanks you for your comment. The SDT team still feels this is covered in FAC-010, 011, and 14. For real-time operations, as you mention, this is covered with IRO-014, R6	