

In response to comments received during the last comment period and other input, the drafting team has taken a new approach to COM-003-1.

This version requires entities to establish communication protocols and then implement a process for identifying, assessing and correcting deficiencies with adherence to those communication protocols. The entity is to ensure that its process is working, rather than requiring the demonstration of absolute compliance with communication protocols at all times and identifying each deficiency as a possible violation.

Additionally, this version was drafted in conjunction with the development of the Reliability Standard Audit Worksheet (RSAW). The parallel development of these documents provided the opportunity for the drafting team to consider the compliance implications of the language in the standard and to offer input into the language of the RSAW. The RSAW is posted for informal comments along with COM-003-1.

Instructions for Commenting

A formal comment period on the draft standard is open through **8 p.m. Eastern on Thursday**, **September 20**. Please use this <u>electronic form</u> to submit comments. If you experience any difficulties in

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using the electronic form, please contact Monica Benson at <u>monica.benson@nerc.net</u>. An off-line, unofficial copy of the comment form is posted on the <u>project page</u>.

Please read carefully: All stakeholders with comments (both members of the ballot pool as well as other stakeholders, including groups such as trade associations and committees) must submit comments through the <u>electronic comment form</u>. During the ballot window, balloters who wish to submit comments with their ballot *may no longer enter comments on the balloting screen*, but may still enter the comments through the electronic comment form. Balloters who wish to express support for comments submitted by another entity or group will have an opportunity to enter that information and are not required to answer any other questions.

A comment period on the draft RSAW is open through **8 p.m. Eastern on Thursday, September 20, 2012**. The draft RSAW is posted on the <u>NERC Compliance Reliability Standard Audit Worksheet (RSAW)</u> <u>page</u>. Please submit comments on the draft RSAW using the <u>RSAW comment form</u> (located under "Tools") to <u>RSAWfeedback@nerc.net</u>.

Next Steps

A webinar on COM-003-1 is planned for the week of September 17, 2012. A separate announcement will be sent when the date and time are finalized.

A successive ballot of COM-003-1 and a non-binding poll of the associated VRFs and VSLs will be conducted beginning on Tuesday, September 11, 2012 through 8 p.m. Eastern on Thursday, September 20, 2012.

Background

The purpose of this project is to require that real-time system operators use standardized communication protocols during normal and emergency operations to enhance the clarity of communications, improve situational awareness, shorten response time and ultimately serve reliability. As requested in the SAR, in the development of this proposed standard, the drafting team reviewed communication protocols in other NERC standards and considered the use of alert level guidelines and three-part communications to achieve consistency across regions. The proposed standard is designed to ensure that reliability-related information is conveyed effectively, accurately, consistently and in a timely manner to ensure mutual understanding by all key parties, both during alerts and emergencies and during the communication of routine operating instructions.

There are two projects that include the modification of the COM family of standards in the scope of their SAR. This project, Project 2007-02 – Operating Personnel Communications Protocols, is concerned with communication protocols for normal and emergency operations. The other project, Project 2006-06 – Reliability Coordination, is concerned with ensuring that the reliability-related

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requirements applicable to the Reliability Coordinator are clear, measurable, unique, enforceable, and sufficient to maintain reliability of the Bulk Electric System.

The Project 2006-06 Reliability Coordination drafting team (RC SDT) has limited the scope of its modifications to those that address communication during emergency operations. The RC SDT has developed a new term, "Reliability Directive," to specifically address those communications, and this term has been approved by the ballot pool. The proposed definition of Reliability Directive is "A communication initiated by a Reliability Coordinator, Transmission Operator or Balancing Authority where action by the recipient is necessary to address an Emergency or Adverse Reliability Impact." The RC SDT is proposing to require three-part communication for Reliability Directives, with a High Violation Risk Factor for those requirements.

Since Project 2007-02 – Operating Personnel Communications Protocols addresses communication protocols for normal *and* emergency operations, the drafting team has proposed a new term, "Operating Instruction," to define the scope of communications to which the COM-003-1 protocols would apply. The proposed definition of Operating Instruction is "Command from a System Operator to change or preserve the state, status, output or input of an Element of the Bulk Electric System or Facility of the Bulk Electric System."

The two standards complement each other. COM-003 establishes the practice of using communication protocols for all Operating Instructions, and provides for an entity to identify, assess and correct any deficiencies with that practice. COM-002 is focused on communications during emergency situations.

Additional information is available on the project page.

Standards Process

The <u>Standard Processes Manual</u> contains all the procedures governing the standards development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate.

For more information or assistance, please contact Monica Benson, Standards Process Administrator, at monica.benson@nerc.net or at 404-446-2560.

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