Name (50 Responses)
Organization (50 Responses)
Group Name (28 Responses)
Lead Contact (28 Responses)
Contact Organization (28 Responses)
IF YOU WISH TO EXPRESS SUPPORT FOR ANOTHER ENTITY'S COMMENTS WITHOUT
ENTERING ANY ADDITIONAL COMMENTS, YOU MAY DO SO HERE. (16 Responses)
Comments (78 Responses)
Question 1 (52 Responses)
Question 1 Comments (62 Responses)
Question 2 (53 Responses)
Question 2 Comments (62 Responses)
Question 3 (44 Responses)
Question 3 Comments (62 Responses)
Question 8 (0 Responses)
Question 8 Comments (62 Responses)

Individual
Scott Bos
Muscatine Power and Water
Yes
Yes
Yes
Individual
Herb Schrayshuen
Self
Yes
Yes
Yes
Individual
Scott McGough
Georgia System Operations Corporation
Yes
No
Internal controls-like language was first introduced into draft 3, R3 and R4. We note that after the technical conference held in Atlanta – Feb 2013, draft 5, R2 and R4 appear to still have remnants of this control language. As discussed in length, it is not appropriate to have such control language in reliability requirements. As GSOC recalls, insertion of R2 and R4 was not discussed or agreed upon at the conference. GSOC recalls that statements were made by participants that it was pre-mature to

include controls language in the standard/requirement at this time. So it appears that revisions to the contrary when were made when in fact NERC statements were made that the full RAI process would not be in place until 2016. GSOC still supports the RAI as it "proposes to transition away from a process-driven enforcement strategy to a proactive, risk-based strategy that clearly defines, communicates, and promotes desired entity behavior in an effort to improve the reliability of the BPS." However, this transition has not been implemented yet. Until NERC transitions the Compliance Monitoring and Evaluation Program (CEMP) to the risk-based strategy, we are still under the past/current process-driven enforcement strategy. A primary concern of GSOC is that until the RAI is developed and provides audit guidance regarding treatment of entity control measures, then auditor subjectivity may creep into the audit process. GSOC believes that once a transition to a risk-based strategy is complete, only then will there be an established "set of parameters" to "guide the exercise of enforcement discretion." "The parameters that would guide the exercise of discretion as well as the protections" "would be in place to ensure due process and to ensure that enforcement decisions are sound and reflect a consistent application of the ERO enterprise enforcement strategy." More specifically, The "decline to pursue option" will have replaced Find, Fix, and Track "after necessary training of [NERC and Regional] personnel, industry and stakeholder outreach, and development of process improvements." At that time, "for those violations that pose a serious or substantial risk, or are not proper candidates for the exercise of enforcement discretion, the ability to impose penalties up to the statutory maximum or adopt increased monitoring and broader audit scope must be retained." At that time, internal controls will be the way to do business (operations/planning) and the process-driven zero-tolerance enforcement process will only apply to those serious or substantial risks. Regarding zero tolerance, some in industry have the false perception that putting internal controls-like language in a reliability requirement NOW will subsequently allow auditors to apply non-zero tolerance. To the contrary, GSOC believes the current process-driven CMEP inclusive of requirements with controls-like language actually requires zero-tolerance treatment. If this standard is passed in its present form an auditor will not have the discretion to "decline to pursue" and must treat every possible violation the same. Of course, NERC/Regional compliance enforcement can now treat some possible violations as applicable to Find, Fix, Track. But that does not require controls language in a requirement. Accordingly, mitigating COMPLIANCE risk has been and still is a driver for the industry's compliance programs. Once the CMEP is transitioned to the risk-based strategy, then such language will be in place with the CMEP and the industry can focus more on RELIABILITY risk and less on COMPLIANCE risk. In addition, GSOC notes that controls-like language is a requirement which is administrative and therefore meets the criteria under P81 for exclusion from reliability requirements. It is not a risk-based reliability requirement. A reliability requirement is one that is (as the statutory definition says) a requirement to provide for reliable operation of the bulk-power system. A reliability requirement includes requirements for the operation of existing bulk-power system facilities, including cyber-security protection, and the design of planned additions or modifications to such facilities to the extent necessary to provide for reliable operation of the bulk-power system. This administrative requirement does not meet the criteria for being a reliability requirement. |

No

R2 & R4 - we believe without any definitive guidance from NERC's still-undeveloped RAI, auditors will apply subjective judgment as to the adequacy of controls used to perform periodic assessments and therefore VRF and VSL are not appropriate.

GSOC recommends that only R1 and R3 survive; eliminate R2 and R4.

Individual

Greg Travis

Idaho Power Company

No

Yes for R1 and R3. No for the definition of "Operating Instructions". It is not written very well and is difficult to understand. The language below is offered as a suggestion to simplify the definition. Operating Instruction —A command by a System Operator of a Reliability Coordinator, Transmission Operator, or Balancing Authority where the recipient is instructed to change or preserve the state, status, output, or input of any portion of the Bulk Electric System. Discussions of general information and of potential options or alternatives to resolve BES operating concerns are not commands and are

not considered Operating Instructions.
Yes
Yes
Individual
Robert W. Kenyon
NERC
No
This will require each entity to develop its own unique protocol. This will not "tighten up" communications. Having each entity follow its own protocol will complicate and confuse communications. One entity will be attempting to communicate with another entity which is not familiar with the protocol being used by the first entity because the second entiy uses a diferent protocol. Protocols if required should be standardized. Moreover, the proposed language requires a protocol that "meets the expectations of its System Operators". The plain meaning of that sentence as writtem is that the protocol meet the expectations of the individual workers, not the entity itself. If this change is going to be approved, should not it read "Each (entity) shall develop protocols that PROVIDE ITS expectations of its System Operators"?
Yes
Yes
Requirement (R1.5) provides inadequate protection against a misunderstanding when directives are issued. Granted, the Requirement does obligate the party receiving the directive to repeat back the directive. However, if the recipient repeats the directive back to the person issuing the directive, and the "repeat back" indicates the recipient has misunderstood the directive, this Requirement merely obligates the person issuing the directive to state the directive again. The Requirement places no obligation on the person issuing the directive, who knows he has been misunderstood, to explicitly and clealy bring to the attention of the recipient that the recipient has misunderstood. All the party issuing the directive has to do is repeat what he has already said. The party issuing the directive is under no obligation to make it clear that there has been a misunderstanding. With respect, I suggest having the person issuing the directive merely repeat it if he's been misunderstood, with no explicit statement that there has been a mistake, leaves open the potential for the recipient to be unaware he has misunderstood and to execute a misunderstood directive.
Individual
Thad Ness
American Electric Power
No
Due to the manner in which the sub-requirements for R1 are written, there could be misinterpretation at which entities plan would require those sub-requirements. We assume that requirements R1.6 and R1.8 apply to an entity that in that instance is *receiving* an Operating Instruction where Requirement R1.2, R1.3, R1.4, R1.5, R1.7 are reserved for only those cases where an entity is *issuing* the Operating Instruction. As currently drafted, R1.6 and R1.8 could be interpreted as somehow requiring an entity that would normally be issuing an instruction (such as an RC) to implement documented communication protocols for an outside receiving entity (such as a Balancing Authority). A potential solution would be to restructure R1 and R3 in such a way that it is based on entities that would be issuing instructions in one requirement and entities that would be receiving instructions in a separate requirement. AEP strongly disagrees with R 1.9, requiring coordination with affected Reliability Coordinators', Balancing Authorities', Transmission Operators', Distribution Providers', and Generator Operators' communication protocols. For AEP, this requirement would

require coordination among numerous entities, and keeping all those protocols in sync would be a significant logistical challenge that does not appear to proportionately improve reliability. In addition, exactly what kind of coordination is needed? R1.1 through are robust enough that adding R1.9 is totally redundant and unnecessary. If beyond R1.1 through 1.8 there are additional, specific needs that still need to be addressed, those should be identified so that specific requirements could be developed if necessary. For this requirement alone, AEP must vote negative on this proposed draft.

No

If an entity has a control in place, but that control is somehow not viewed favorably during an audit, is that entity potentially in violation of an additional requirement? R2 and R4 appear to have potential double jeopardy implications.

It needs to be acknowledged by the project team that there are overlapping requirements between COM-003-1 and COM-002-3. Although the project webpage states that "COM-003-1 establishes the practice of using communication protocols for all Operating Instructions", COM-003-1 explicitly includes Reliability Directives along with the Operating Instructions. We understand Reliability Directives to be a subset of Operating Instructions, so with respect to Reliability Directives, there are unnecessary overlaps which will only cause confusion in adhering to the standard. In short, COM-003-1 should only be adopted with the understanding that the overlapping requirements in COM-002 would then be retired. AEP supports the forward-looking approach advocated by NERC's Reliability Assurance Initiative. We believe this proposed standard puts "the cart before the horse" in that it mandates internal controls for a limited number of requirements rather than taking a wholistic approach where internal controls are generally required for all standards and where that language is housed outside of the standard itself. AEP believes this R 1.3 is redundant with TOP-002 R18. Other requirements in this proposed standard are already in place to drive clarity of communication.

Individual

John Seelke

Public Service Enterprise Group

No

We found what we believe to be a typo in the definition of "Operating Instruction." The defined term "Operating Instruction" has this phrase: "…where the recipient of the command is expected to act, 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 comma after "act" should be removed because it is not grammatically correct. If removed, the phrase would become: "…where the recipient of the command is expected to act 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.

Yes

The purpose statement needs to have "System Operators" limited to just those of RCs, TOPs, and BAs. The definition of "System Operators" in the NERC Glossary includes GOPs. The capitalizd language added to the Purpose statement below would clarify this: Purpose: To provide System Operators OF RELIABILITY COORDINATORS, TRANSMISSION OPERATORS, AND BALANCING AUTHORITIES predefined communications protocols that reduce the possibility of miscommunication that could lead to action or inaction harmful to the reliability of BES.

Individual

Andrew Gallo

City of Austin dba Austin Energy

No

The latest version of COM-003 introduces a potential conflict with COM-002 related to the use of one-way burst messaging systems to issue a Reliability Directive. In COM-003, the follow Requirements apply: R1.7 Instances where the issuer of an oral Operating Instruction or Reliability Directive using a one-way burst messaging system to communicate a common message to multiple parties in a short

time period (e.g. an All Call system) is required to verbally or electronically confirm receipt from at least one receiving party. R1.8 Require the receiver of an oral Operating Instruction or Reliability Directive using a one-way burst messaging system to communicate a common message to multiple parties in a short time period (e.g. an All Call system) to request clarification from the issuer if the communication is not understood. R3.3 Require the receiver of an oral Operating Instruction or Reliability Directive using a one-way burst messaging system to communicate a common message to multiple parties in a short time period (e.g. an All Call system) to request clarification from the issuer if the communication is not understood. In other words, COM-003 allows one-way burst messaging for Reliability Directives and prescribes: • the issuer confirm receipt from at least one receiving party • the receiver request clarification from the issuer if the communication is not understood However, COM-002 has the following requirements: R2. Each Balancing Authority, Transmission Operator, Generator Operator, and Distribution Provider that is the recipient of a Reliability Directive shall repeat, restate, rephrase, or recapitulate the Reliability Directive. R3. Each Reliability Coordinator, Transmission Operator, and Balancing Authority that issues a Reliability Directive shall either: • Confirm that the response from the recipient of the Reliability Directive (in accordance with Requirement R2) was accurate, or • Reissue the Reliability Directive to resolve a misunderstanding. In other words, in the case of a one-way burst message used for Reliability Directives, COM-002 does not allow for only those responses required in COM-003 but instead requires a full 3 way communication from all parties. This potentially sets up both the issuer and receiver for violating COM-002 if they respond to a one-way burst message Reliability Directive as the requirements indicate in COM-003. In order to fully comply with BOTH standards, the receiver would have to contact the issuer and repeat what was said on the original burst message; then, the issuer would confirm the response was accurate before acting on the message.

Yes
Yes
Group
Salt River Project
Bob Steiger
Electric Reliability Compliance
Yes
Yes
No
The VSLs give a higher violation to a GO than a BA for exactly the same error, even though the consequences with the BA are much greater. A GO who fails to require 3-part responses when requested is tagged with a Moderate violation, the BA with a lower. We believe the VRF should be Low rather than Medium for R4.
R4 should be eliminated and R3 should end after the first sentence. GOs do not issue Operating Instructions. They only receive instructions from others. GOs should have a communications procedure as part of their operations. However, the methods used are properly business decisions made by the GO. The content, thoroughness and effectiveness of a communications plan are excellent items to consider when assessing an internal compliance program.
Group
Northeast Power Coordinating Council
Guy Zito
Northeast Power Coordinating Council
Yes

No
Requirement 3 is an administrative requirement that does little to benefit the reliable operation of the BES. By specifically calling out "Directives" in the requirement it creates the potential for double jeopardy with other requirements such as COM-002, IRO-001 and TOP-001 which all speak to following Directives. Requiring a documented communications protocol when the only responsibility is repeat back the instruction as received and seek clarification if the directive is misunderstood is beyond the intended scope of the reliability program in general. This requirement should be removed. Requirement 4 should be removed because it is unnecessary and excessive. The smaller entities that this will affect do not record phone conversations and it would be difficult to assess performance based on the very low number of "Operating Instructions" or "Directives" that these entities actually receive. The performance of "Operating Instructions" should be the proof. A better approach would be to amend the above mentioned standards (IRO, TOP, COM) to include "Operating Instructions" along with Directives. The term "All Call" is used in Requirement 1 Part 1.8. It should be defined in the NERC Glossary. If it isn't to be defined, then it should not be capitalized. Regarding Requirement 1 Part 1.8, and Requirement 3 Part 3.3, the receiver of an oral Operating Instruction or Reliability Directive from a one-way burst messaging system is "to request clarification from the issuer is the communication is not understood." What if the receiver never gets the issued Operating Instruction or Reliability Directive? Regarding Requirement 1 Part 1.8, and Requirement 3 Part 3.3, suggest changing "using" to "from" to make them read "Require the receiver of an Oral Operating Instruction or Reliability Directive from a one-way burst…"
Individual
John Brockhan
CenterPoint Energy Houston Electric L.L.C.
No
See comments below
No
See comments below
CenterPoint Energy appreciates the opportunity to comment. The Company recognizes the work of the SDT however CenterPoint Energy still has large concerns with Draft 5. Specifically: 1) The addition of the term "Reliability Directive" to COM-003-1. 2) R1.9 coordination with other entities. 3) The addition of specifying the alpha-numeric format in R1.4. 4) The VSL's. 1) The addition of the term "Reliability Directive" to COM-003-1 introduces a potential conflict with the already industry and NERC BOD approved COM-002-3. Requirements R1.7 of the current draft of COM-003-1 states: "Instances where the issuer of an oral Operating Instruction or Reliability Directive using a one-way burst messaging system to communicate a common message to multiple parties in a short time period (e.g. an All Call system) is required to verbally or electronically confirm receipt from at least one receiving party." (emphasis added) Requirements R1.8 and R3.3 of the current draft of COM-003-1 allow the recipient of a Reliability Directive from a one way burst messaging system communication to "…request clarification from the issuer if the communication is not understood." (emphasis added) COM-002-3 makes no such distinctions regarding the issuing or receiving of Reliability Directives. COM-002-3 is clear; whether an entity is issuing or receiving a Reliability Directive 3-part communication must be employed. The Company firmly believes this conflict could easily cause entities to follow COM-003-1 yet be non-compliant with COM-002-3. In addition, since COM-002-3 already addresses emergency communications and has been reviewed and approved by industry stakeholders as well as the NERC BOD CenterPoint Energy believes there is no additional reliability benefit to adding "Reliability Directive" to COM-003-1. CenterPoint Energy strongly recommends deleting "Reliability Directive" from COM-003-1. 2) CenterPoint Energy has strong concerns regarding the addition of R1.9 to Draft 5 of COM-003-1. R1.9 requires that an entity's documented communication protocols address coordination with affected RC's, BA's, TOP's, DP's, and GOP's communication protocols. For responsible entities that have interconnections with multiple entities, this will be the equivalent of

"herding cats". The Company does not believe it will be possible to coordinate with and come to a common agreement regarding the items in R1.1 – R1.8 with multiple parties. For example: R1.4 requires the documented communication protocols to address the format to be used when alpha-numeric clarifiers are necessary. Where a responsible entity is a TOP and is interconnected with multiple other TOP's, DP's, GOP's as well as its RC, and BA, it will be extremely difficult for all parties to agree to a common alpha-numeric format. In addition, coordination will become an issue when any of the parties decide to revise or amend its communication protocols. This will be an on-going management issue for all entities. CenterPoint Energy strongly recommends R1.9 be deleted from COM-003-1. 3) CenterPoint Energy believes the addition to R1.4 requiring a responsible entity to specify the format to be used where alpha-numeric clarifiers are necessary is an unnecessary and burdensome requirement. The Company agrees with the SDT's decision to add to R1 and R3 language that allows an entity to address, where applicable, the items in the sub-requirements instead of requiring these items to be in the communication protocols as it was in Draft 4. However, the addition of specifying the format for those clarifiers is a step backwards. Draft 4 did not require documenting a specific format and therefore would have allowed an entity the flexibility to use, for example, "Baker" or "Bravo" for the letter "B". The Draft 5 version now sets up an operator for a possible violation if the protocol specifies "Baker" and the operator inadvertently uses "Bravo". The purpose of using alpha-numeric clarifiers is to ensure the recipient understands that the alpha component, in this case, is the letter "B" and not "E" or "D". The use of "Baker" or "Bravo" accomplishes that purpose. The Company believes having to specify a format to use does not result in any reliability benefit and therefore CenterPoint Energy strongly recommends the deletion of the format requirement from R1.4. 4) CenterPoint Energy firmly believes there should be no High or Severe VSL for simply failing to document a process, policy, or procedure. High or Severe VSL's should only apply to the most egregious violations that have a high impact on the reliability of the BES. As NERC has stated on many occasions, the purpose of the Reliability Standards is to enhance the reliable operation of the BES. Where an entity is performing the process, procedure, or task required in an applicable Standard and therefore is reliably operating its portion of the BES, yet has failed to document that process, procedure, or task, penalizing that entity with a High or Severe VSL will not result in improved reliable operation of the BES. CenterPoint Energy recommends no VSL's higher than Moderate. CenterPoint Energy supported Draft 4 of COM-003-1 however, the changes made by the SDT in Draft 5 has caused the Company to rethink its position. If the SDT were to make the recommended changes CenterPoint Energy would be able to support the Standard. |

| Individual |
| John Bee on behalf of Exelon and its' affiliates |
| Exelon |
| |
| Yes |
| |
| No |
| See comment #3 in the comment area of the last question |
| |
| 1) In the COM-003 FAQ document the response to question 5 states that R3 and R4 apply to the "recipient of the command" where the recipient is "expected to act, to change or preserve the state, status, output, or Element of the [BES] of Facility of the [BES]. In many Registered Entity organizations, the commands from a TOP, BA or an RC typically go through an intermediary dispatch control center. Then, if necessary, the commands are passed through to the associated DP or GOP. How does COM-003 apply to such organizations with respect to R3 and R4? 2) In the COM-003 FAQ document the response to question 3 states that entities "develop their own programs that support the requirements of COM-003." Suggest that the SDT clarify that recorded lines are not specifically required and that other tools such as documented direct supervisory observation could be used. 3) In R3 and R4 the term 'operators' is used, in generation stations this term is widely used and relates to different job functions. Suggest clarifying the term by stating 'operators who receive Operating Instructions or Reliability Directives from a Balancing Authority, Reliability Coordinator or Transmission Operator'. 4) The COM-003 language that includes 'reliability directives' has the potential to create a compliance issue with COM-002 related to "all calls" since some Transmission Operations use 'all calls' or 'one way burst messaging' to communicate reliability directives. These

communication methods typically do not allow for a response or repeat back or for an acknowledgement of the response accuracy. The problems with COM-002 cannot be solved by making edits to COM-003. Instead, changes to COM-002 should be made to clarify that "all calls" or burst messaging systems can be used to deliver Reliability Directives.

Group
Western Electricity Coordinating Council
Steve Rueckert
WECC
No
We do not agree with the revisions to the language of R1 and R3. The changes are a lowering of the bar for reliability. Earlier versions identified specific communication protocols for each BA, RC, and TOP. These specific requirements would have resulted in a consistent approach to communications between all sysem operators. The proposed revisions coupresult in varying procedures that do not close the gap in communcations. The watered-down versions of the requirements are essentially a fill-in-the-blank type of standard allowing each applcable entity to develop their own protocols.
Yes
No
Based on the changes we believe are necessary for Requirements R1 and R3, we beleive the VSLs should be changed accordingly.
The apparent conflict beteen COM-002-3 and COM-003-1 needs to be addressed. The information provided in the Frequently Asked Questions document was helpful but it is not clear that a drafting team response to a frequently asked question can alter what is required in another standard. It s not clear that developeing a communcations protocol that says three-part communcation is not necessry for a one-way burst message is going to relieve a BA, RC, or TOP from the requirement to use three-part communcations for all Reliabliity Directives. If the position is that thre-part communcaiton is not required for one-way burst messages, this exception should be included in COM-002-3.
Individual
D. Jones
Texas Reliability Entity
Texas RE voted "no" on this draft for reasons expressed in our comments submitted on prior drafts. In particular, we are concerned about lack of coordination between COM-003 and COM-002.
Group
Seattle City Light
paul haase
seattle city light
Yes
Yes
Seattle City Light is supportive of the proposed "assess and implement" approach to compliance for COM-003 R2 and R4.
No
The VSLs give a higher violation to a GO than a BA for exactly the same error, even though the consequences with the BA are much greater. A GO who fails to require 3-part responses when requested is tagged with a Moderate violation, the BA with a lower. Both should be lower.

Seattle City Light is concerned about the conflict between COM-002 and COM-003 regarding responses to Reliability Directives. In the case of a one-way burst messaging used to issue a Reliability Directives, COM-002 does not allow for only those responses required in COM-003 but instead requires a full 3-way communication from all parties. This potentially sets up both the issuer and receiver for violating COM-002 if they respond to a one-way burst messaging Reliability Directive as the requirements indicate in COM-003. In order to be fully compliant with BOTH standards, the receiver would have to contact the issuer, repeat what was said on the original burst message, then the issuer would confirm that the response was accurate before acting on the message. Seattle City Light appreciates the responsiveness of the OPCPSDT in quickly posting an FAQ once the COM-002/COM-003 issue was raised. The opinion of the OPCPSDT not withstanding, Seattle is not reassured by the secondary documentation cited in the FAQ when the plain language of the two Standards are in conflict. Past experience, such as illustrated in the 2008 PacifiCorp case, shows that where Standards are unclear or in conflict, auditors have been prone to take the language at face value and disregard secondary documents. In addition, entities charged with implementing the Standards are prone to change practices to avoid ambiguous areas and compliance risk, which in this case could result in the phase-out of effective all-call or burst messaging systems for announcing reliability Directives. As a result, Seattle is sufficiently concerned about the audit and reliability implications created by the present draft of COM-003 to change from a YES position to NO at this time. Seattle is prepared to support COM-003 once this conflict is addressed. A simple solution would be to eliminate the words "Reliability Directive" from COM-003, which after all is designed to address "Operating Instructions." Inclusion of Reliability Directive language in COM-003 creates an additional complication, by making R1.8 incomplete. R1.8 require the receiver of an oral Operating Instruction or Reliability Directive using a one-way burst messaging system to communicate a common message to multiple parties in a short time period (e.g. an All Call system) to request clarification from the issuer if the communication is not understood. This language does not address the next step: if an entity receives a burst message from its RC that is unclear, and is unable to reach the RC for clarification (perhaps because the RC is busy handling the emergency situation), what is the entity to do? Implement to Reliability Directive to its best understanding? Wait until it can clarify the Directive? Do nothing? Serious reliability and compliance risks attend all of these possibilities, adn the Standard should be clear as to which is prefered. Seattle again recommends removing "Relaibility Directive" language from COM-003 as a simple solution. If the Reliability Directive language remains in COM-003, this potentiality should be addressed in the Standard as to which approach is prefered.

Group
Duke Energy
Michael Lowman
Duke Energy
Yes
R1.7, R1.8, and R3.3 – All Call should not be capitalized since it is not a defined term. It should instead be placed in quotation ("All Call"). R1.6, R1.8, R3.2, and R3.3 – Change the word "Require" to "Requirement for" to better align grammar with R1.
Yes
Yes
Group
Platte River Power Authority
Christopher Wood
Platte River Power Authority
Agree
Large Public Power Council
Group
San Diego Gas & Electric

Annamay Luyun	
San Diego Gas & Electric	
Yes	
Yes	
Yes	
Please see comments: NEW NERC RELIABILITY STANDARD – COM-003-1 – Version 5 Version 5 comments R1.1 and R3.1 Proposed Updated Language: Use of English language when issuing or responding to an oral or written Operating Instruction or Reliability Directive, unless another language is mandated by law or regulation, or as otherwise agreed to by the parties. Comment: The Western Interconnection is interconnected with Mexico, south of the California, Arizona and New Mexico borders and with Canadian provinces north of the Washington, Idaho and Montana borders. SDG&E, which is located at the California-Mexico border, communicates almost daily with the Mexico utility located in Baja California, CFE. When the standards became mandatory and enforceable, in compliance with COM-001, R4, SDG&E maintained an agreement with CFE which documents that English will typically be used, but in instances where communicating in Spanish is more effective in ensuring system reliability, the personnel involved will use Spanish given that all parties involved are fluent in Spanish. CFE does not have a mandate to be in compliance with the U.S. NERC Reliability Standards. The native language in Mexico is Spanish, and SDG&E staffs its Electric Grid Operations department with personnel who are fluent in Spanish, therefore its agreement with CFE is managed to insure that all communications with its neighbor to the south are clear, concise, and understood. In addition, there are at least two generation stations located south of the California border, interconnected with SDG&E, and the employees at those stations are fluent in Spanish, therefore, because those generation station personnel will also communicate with the California ISO and the WECC RC on occasion, those entities need the flexibility provided in COM-001 R4 to be carried through to COM-003-1, R1.1. & R3.1. All policies and procedures developed by power company entities south of the border are written in Spanish, and at times, written communication between U.S. and entities in Mexico are in Spanish. Since SDG&E's neighbors to the south do not have to comply with U.S. NERC Reliability Standards, and U.S. entities are required to comply with U.S. NERC Reliability Standards, SDG&E proposes the revisions to COM-003-1 R1.1 and R3.1 as identified above. This proposed revision provides for the flexibility that already exists in COM-001 R4 that has effectively worked over the last several years. R1.2 Proposed Updated Language: Instances that require time identification when issuing an oral or written Operating Instruction or Reliability Directive, and the format for the time identification specified uses a 24-hour clock format and the Entity's time zone. Comment: SDG&E prefers the language proposed above. The proposed language leaves NO doubt associated with how to reference a specific time for ALL entities. If one entity uses the 24 hour clock, and another is using a.m. and p.m., it simply leaves the opportunity for some confusion that can be eloquently avoided when stating that a 24 hour clock is to be used.	
Group	
North American Generator Forum Standards Review Team	
Patrick Brown	
Essential Power, LLC	
No	
See answer to 4 below.	
No	
See answer to 4 below.	
The SRT agrees with the concepts put forth in COM-003, but have some concerns, particularly with the proposed administrative burden associated with the Standard. The SRT offers to following comments: 1. R1.9 requires a TOP, BA, and RC to coordinate with affected RC, BA, TOP, DP and GOP	

communication protocols; this could result in a TOP having to coordinate with a hundred+ different entities' communications protocols. This coordination would not improve reliability, but only serve to create confusion and significant communication time delays in real-time operations. Both R1 and R4 create significant documentation and administrative burdens, without providing a comparable improvement to the reliability of the BES. As reliability based Standard, COM-003 should focus on those actions that would have a direct impact on reliability, while minimizing the administrative burden. 2. R3 should end after the first sentence. GOPs do not issue Operating Instructions. They only receive instructions from others. GOPs should have a communications procedure as part of their operations, however, the methods used are properly business decisions made by the GOP. The content, thoroughness and effectiveness of a communications plan are excellent items to consider when assessing an entity's internal compliance program. 3. R4 raises the question of sufficiency of an entities corrective program. The RSAW requires the GO to turn over records of monitoring communications as well as records of corrective actions and then prove the "problem" is not still in place. This standard could easily turn into a high-profile audit target due to the varying concepts of what does and does not constitute a sufficient corrective action program. 4. The SRT recommends that the language to M4 be changed as follows: M4. Each Distribution Provider and Generator Operator shall provide the results of its periodic assessment and of any corrective actions (if any corrective actions were implemented) developed for Requirement R4. Examples of sufficient periodic assessment programs include, but are not limited to, the following: -Documented review of voice logs for a total of at least one hour per calendar year for each operator (does not need to be a single session) -Documented personal monitoring of communications for a total of at least one hour per calendar year for each operator (does not need to be a single session) -Documented annual training Examples of sufficient corrective action programs include, but are not limited to, the following: -Documented refresher training -Documented meeting -Documented "hot box" communication 5. The VSLs give a higher violation to a GOP than a BA for exactly the same error, even though the consequences with the BA are much greater. A GOP who fails to require 3-part responses when requested is tagged with a Moderate violation, while the BA would receive a Lower. 6. In the RSAW, the following passage should be expunged; "Where practicable, verify that deficient communication practice was indeed corrected by reviewing evidence of Operator communications (such as voice recordings) occurring after the date of the corrective action to determine if deficient communication practice was corrected." Differentiating between slips of the tongue and "deficient communication practices" involves subjective judgments. The same is true for attempting to identify changes in an operator's degree of understanding, especially when doing so through the numbing process of making before-and-after voice recording comparisons. This is an open-ended matter that could very quickly become an unreasonable compliance burden. RSAWs in general should not introduce new requirements, measures or forms of evidence, so the GOP materials reviewed should be limited to the protocols/procedures of R3, and the assessment forms and corrective action reports of R4.

| Individual |
| Ronnie Hoeinghaus |
| City of Garland |
| |
| Yes |
| |
| No |
| R2 & R4 Requirements are written assuming that corrective actions will be necessary. Should be written to state corrective actions "if necessary" |
| |
| 1)COM-003 now includes "Reliability Directives" which is why COM-002-3 was developed and approved – COM-002-3 does not need to exist if Reliability Directives are covered in COM-003 2)In the Background Section of the "Unoffical Comment Form", it is stated that the final goal of this standard was to implement 3 part communication. It would seem that it would be simple to state in a requirement that the entity has to develop a procedure to use 3 part communications for Operating Instructions using English except where prohibited by law or regulation and then a 2nd requirement to develop an assessment process with a corrective process if necessary. It is totally unnecessary to write a requirement with 9 sub parts that must be accounted for in a policy and procedure for an industry wide practice that already exists. As written, it only add burdensome and unnecessary |

paperwork to operations and compliance departments that has to be maintained and audited – again for a process that already exists industry wide. 3) Why is the Time Horizon stated as "Long Term Planning" instead of "Real-Time"	
Individual	
Jim Howard	
Lakeland Electric	
Agree	
Florida Municipal Power Agency (FMPA)	
Group	
Hydro One Networks Inc.	
David Kiguel	
Hydro One Networks Inc.	
Yes	
We are not convinced that a Standard is the best approach to routine communications, but we feel that the latest draft is a reasonable compromise.	
Individual	
David Jendras	
Ameren	
No	
We do not believe that we need a definition for the term "Operating Instruction" and we would like to see this defined in the entities protocol. However if a definition is included, we ask the SDT to require an RC, TOP, or BA to identify when an Operating Instruction is used to communication to a GOP or DP.	
No	
We ask the SDT to delete requirements R3 and R4 because they are redundant and may cause double jeopardy for entities as these requirements are addressed in requirements R1 and R2 for the BA, RC, and TOP communication protocols with DPs/GOPs.	
No	
Concerning the VRF and VSLs we ask the SDT to review the severity levels because we do not believe that any violations of this standard should be at either a High or Severe level since these are documentation requirements.	
We would ask the SDT to consider for clarity to this standard that COM-002 only address Reliability Directives and COM-003 only address Operating Instructions.	
Individual	
Joe O'Brien	
NIPSCO	
see NIPSCO comments from Julaine Dyke, thanks	
Individual	
Martyn Turner	
LCRA Transmission Services Corporation	
Agree	

Seattle City Light
Individual
Jack Stamper
Clark Public Utilities
Yes
Yes
No
The VSLs give a higher violation to a GO than a BA for exactly the same violation, even though the consequences with the BA are much greater. A GO who fails to require 3-part responses when requested is tagged with a Moderate violation, the BA with a Lower. Both should be Lower.
Clark Public Utilities is concerned about the conflict between COM-002 and COM-003 regarding responses to Reliability Directives. In the case of a one-way burst messaging used to issue a Reliability Directive, COM-002 does not allow for only those responses required in COM-003 but instead requires a full 3-way communication from all parties. This potentially sets up both the issuer and receiver for violating COM-002 if they respond to a one-way burst messaging Reliability Directive as the requirements indicate in COM-003. In order to be fully compliant with BOTH standards, the receiver would have to contact the issuer, repeat what was said on the original burst message, then the issuer would confirm that the response was accurate before acting on the message. Clark appreciates the responsiveness of the OPCPSDT in quickly posting an FAQ once the COM-002/COM-003 issue was raised. The opinion of the OPCPSDT not withstanding, Clark is not reassured by the secondary documentation cited in the FAQ when the plain language of the two Standards are in conflict. A simple solution would be to eliminate the words "Reliability Directive" from COM-003, which after all is designed to address "Operating Instructions."
Individual
Alice Ireland
Xcel Energy
Agree
MRO NERC Standards Review Forum (NSRF)
Group
SERC OC Standards Review Group
Gerry Beckerle
Ameren
No
No
No
Regarding question #1, the SERC OC Review Group agrees with the definition of Operating Instruction. While we also can agree to the changes made to R1, we feel R3 in its entirety is unnecessary and duplicative. Removal of the word "develop" would eliminate double-jeopardy concerns. R3 could be acceptable if "develop and" are omitted and "as developed in R1" is inserted after "protocols" and before "that." It should be noted that this suggestion only applies to the sub-requirements in R1 that correspond to the proposed sub-requirements in R3. Regarding question #2, R2 is acceptable and R4, as stated above for R3, is unnecessary and duplicative. Regarding question #3, we agree with the VRFs and VSLs for R1 and R2. Based on our previous comments, we do not agree with the need for R3 and R4, and therefore VRFs and VSLs for these requirements are not needed. Additional SERC OC Standards Review Group supporting these comments are James Wood

with Southern Company and Kelly Casteel with TVA. 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.

Individual

Wayne Sipperly

New York Power Authority

Agree

Large Public Power Council (LPPC)

Group

Dominion

Mike Garton

Dominion Resources Services, Inc.

Agree

EEI

Individual

Julaine Dyke

NIPSCO

Yes

No

"Each Distribution Provider and Generator Operator shall develop and implement documented communication protocols that outline the communications expectations of its operators." This language is unclear as to the communication expectation to its operators. Does this address the communications between the DP and the TOP only? Or does this apply to the communication between the DP and field personnel?

Yes

As per the effort of paragraph 81, we feel that COM-002 and COM-003 should be combined into one standard. It is evident there is redundancy between these two standards which should be eliminated.

Individual

Michelle D'Antuono

Occidental Energy Ventures Corp

No

See comments below.

Yes

Yes

Occidental Energy Ventures Corp. ("OEVC") is firmly on board with the strategy taken by the drafting team to incorporate structure in the communication of Operating Instructions, while allowing each entity some flexibility in the process. As a GOP, we take very seriously our responsibility to accurately capture and execute all instructions from RCs, BAs, and TOPs that may affect the state of the Bulk Electric System. This approach will allow us to differentiate between instructions issued orally, via email/messaging, and one-to-many broadcasts – which change rapidly as new communications technologies are introduced. In addition, we agree that a risk-based compliance method is necessary – particularly in the case of oral communications. Even the most perfectly trained operators can stumble on occasion, and the result should not be a compliance violation unless the errors continue to manifest themselves. Furthermore, the amount of overhead necessary to ensure that every oral instruction is repeated back with time stamps, equipment identifiers, and alpha-numeric clarifiers is

extraordinary in the zero-defect model. However, we are not convinced that these excellent intentions are captured in a manner that will assure consistent assessments by Compliance Enforcement Authorities. It is clear from our reading of the FAQs recently posted by the drafting team that many industry respondents are unclear how auditors will interpret COM-003-1's requirements over a wide range of operating scenarios – a concern that we share. This means that a common understanding must be reached in an enforceable document that both operators and CEAs can rely on for consistency. In our view, the RSAW is the logical vehicle for this approach. It is a fundamental audit tool and has been traditionally used as a semi-binding reference in the evaluation of reliability compliance. In addition, the concurrent development of the RSAW with COM-003-1 was instituted precisely to ensure uniformity between the SDT's intent and the standard's enforcement. This implies that the RSAW must contain a greater level of detail to address multiple situations – and we have provided specific suggestions in our RSAW feedback form along these lines. Lastly, we do not have a clear understanding how Requirement R1.9 will be implemented. As it is presently written, it would seem that GOPs should expect some notification from their RCs, BAs, and TOPs that communication policies are to be "coordinated." Our experience has been that some entities simply post instructions on their web-sites hidden among many other documents – which does not count as coordination in our view. However, we are not sure that the issuers' policies are consistent with all of R1's other sub-requirements. As such, OEVC recommends that R1.9 be removed.

Individual
Jonathan Appelbaum
The United Illuminating Company
Yes
Yes
Yes
UI as its functional role of DP is voting No because of the conflict between COM-003 R 1.7, R1.8 and R3.3 with COM-002 R2. COM-003 allows for the RC/TOP/BA communication protocol when issuing Reliability Directives to overide the clearly stated requirement of COM-002 R2 that a DP SHALL REPEAT, RESTATE, REPHRASE, OR RECAPITULATE the Reliability Directive. There is no leeway in COM-002 R2 to allow for solely providing an affirmation of receipt of a verbal reliability directive or not repeating back the message when the RC/TOP requests no repeat. As a DP, UI is placed in a position of attempting to comply with two opposing requirement in the two standards. If the RC/TOP communication protocol clearly stated that there will be no repeat back when receiving a verbal Reliability Directive and COM-003 requires a DP to comply with the RC/TOP communication protocol, UI would have to choose between violating COM-002 or COM-003. Since the VRF for COM-002 R2 is HIGH indicating a greater risk to reliability than COM-003 VRF LOW, UI would comply with COM-002 R2. This issue can be resolved either by correcting COM-002 by assigning the flexibility of opting out of repeat back to the RC/TOP/BA function, or removing the words "Reliability Directive" from COM-003.
Group
pacificorp
ryan millard
pacificorp
No
PacifiCorp supports the proposed language referenced under R1 and the definition of "Operating Instruction" but does not support the following language proposed under R1.4: "Instances where alpha-numeric clarifiers are necessary when issuing an oral Operating Instruction or Reliability Directive, and the format for those clarifiers." Under the proposed draft, instances where alpha-numeric clarifiers are "necessary" are not clearly defined. In the absence of a clear definition, the identification of such instances is open to interpretation by both the entity and the auditor. Moreover,

requiring the use of alpha-numeric clarifiers is not warranted when the requirements listed in R1.5 - R1.8 (requiring the strict use of three-way communication) alleviate any possibility of miscommunication, which PacifiCorp understands to be the drafting team's intent in the development of separate Requirement R1.4. PacifiCorp believes implementing the use of alpha-numeric clarifiers poses additional risk due to the introduction of ambiguous language.	
No	
PacifiCorp does not support the following language referenced under R2 (with substantially similar language in R4) as it pertains to the Balancing Authority, Reliability Coordinator, Transmission Operator, Generator Operator, and Distribution Provider: "...shall develop method(s) to assess System Operators' communication practices and implement corrective actions necessary to meet the expectations in its documented communication protocols developed for Requirement R1." In the absence of any proposed criteria for measuring how the aforementioned method(s) are developed, determining whether an entity has successfully met the expectations it has established in its communication protocols is subject to a multitude of interpretations. Moreover, Measures M2 and M4 are focused exclusively on the results of an entity's periodic assessment and corrective actions. PacifiCorp believes that a results-based review of an entity's assessment fails to provide any insight into the quality of the assessment itself.	
No	
PacifiCorp does not support the VRFs and VSLs for Requirements R2 and R4. In keeping with PacifiCorp's comment in Question 2, a method of assessment that is not explicitly defined and cannot be measured against a clear set of criteria makes it difficult for an entity or auditor to determine whether any of the corrective actions taken by an entity have fulfilled the expectations documented in their communication protocols. Assigning a severity level based on a percentage of completion is redundant when an entity cannot determine what a "complete" assessment is or the criteria by which it is measured.	
Individual	
William O. Thompson	
NIPSCO	
No	
See comments submitted on NIPSCO's behalf by Julaine Dyke	
Yes	
See comments submitted on NIPSCO's behalf by Julaine Dyke	
Group	
MRO NSRF	
Russ Mountjoy	
MRO	
Yes	
Yes	
Yes	
The NSRF recommends the following issues be addressed in order to provide a less ambiguous Requirement. Regarding R1 and the term; 'implement'. The "Blue Box" explanation is not carried forward when the standard is filed with the Commission. The "Blue Box" explanation greatly expands the meaning "and implement". Our understanding of 'implement' is that you will use the documented communication protocols in the manner outlined in your System Operator communications protocols.	

Training is not a demonstration of implementing. Only actual System Operator communications demonstrating the use of the communication protocols is demonstrating implementation. Recommend that "training" be removed from the blue text box since training is inherent to assuring that protocols are followed. The Training issue will also need to be removed from the RSAW. Suggest R1.8 be removed. This requirement cannot be measured. How do you prove compliance? An entity will be asked to prove the negative and demonstrate that my System Operators were not confused? I can see where I might have to provide an attestation that states: "My System Operators were not confused on any one-way burst messages." This proposed requirement is a common sense issue. R1.9, R3.3: the word "coordination with affected" is vague and open to many interpretations. Suggest this requirement be deleted. Should the requirement be kept, suggest clarifying what is intended in the requirement. Such as "RC, TOP's BA's… shall share their communication protocols with applicable RC, BA, TOP, … " The NSRF does not understand if the intent is to share or coordinate protocols? Both have different outcomes, please clarify. The NSRF believes that the infrequent communications to a Distribution Provider, that are not already in scope of COM-002-3, do not carry any considerable risk to the BES. The administrative burden on the Distribution Provider should be greatly reduced, as there would not be a measurable gain in reliability by requiring them to formally document communication protocols and establish a monitoring program. To address these concerns, we recommend that Distribution Provider be removed from the applicability in R3 and R4. Secondly, we suggest that an R5 be created similarly to COM-002-3, R2. Recommend the following for how the new R5 might read: R5. Each Distribution Provider that is the recipient of an oral Operating Instruction, other than Reliability Directives, shall: 5.1 Use the English language, unless another language is mandated by law or regulation. 5.2 Repeat, restate, rephrase, or recapitulate the oral Operating Instruction, excluding oral Operating Instructions issued as a one-way burst message.

Individual

Michael Falvo

Independent Electricity System Operator

No

We agree with most of the changes made. We offer a preferred wording for Part 1.4, and have a concern over the ambiguity of Part 1.6 and Part 1.8. Part 1.4 states that: 1.4 Instances that alpha-numeric clarifiers are necessary when issuing an oral Operating Instruction or Reliability Directive, and the format for those clarifiers. A preferable description would say that the protocol should address the risk of miscommunication arising from alpha-numeric identifiers. This could be addressed through the use of the phonetic alphabet or through different means if local conditions dictate a different approach. As noted above, we are concerned over the ambiguity of Part 1.6, which states that: 1.6 Require the recipient of an oral two party, person-to-person Operating Instruction to repeat, restate, rephrase, or recapitulate the Operating Instruction, if requested by the issuer. When read together with the last sentence in R1, "The documented communication protocols will address, where applicable, the following:", this part is unclear as to whether it is to identify the instances that the repeat is required,or that the documentation needs to include explicit statements that the issuer needs to request a repeat when issuing an operating instruction or reliability directive which the issuer feels a repeat is necessary. This sub-requirement part, as written, is ambiguous and appears to be more applicable to the instruction recipient than the issuer. When read together with Part 3.2, Part 1.6 appears to be requiring the issuer to identify the instances that a repeat is required. We therefore suggest the SDT to revise Part 3.2 as follows: 1.6 Instances where it requires the recipient of an oral two party, person-to-person Operating Instruction to repeat, restate, rephrase, or recapitulate the Operating Instruction, if requested by the issuer. Similar concerns with Part 1.8 except the mirror part 3.3 does not contain the wording "if requested by the issuer". Hence, we assume that the recipient is required to request clarification from the issuer if the communication is not understood without having to be asked. Therefore, we propose Part 1.8 be revised as follow: 1.8 A stipulation that the receiver of an oral Operating Instruction or Reliability Directive using a one-way burst messaging system to communicate a common message to multiple parties in a short time period (e.g. an All Call system) to request clarification from the issuer if the communication is not understood.

Yes

Yes

Individual	
Nazra Gladu	
Manitoba Hydro	
Yes	
(1) Definition "Operating Instruction" - reference is made to both 'Bulk Electric System' and 'BES'. For consistency, either the words or acronym should be used.	
No	
(1) Compliance Data Retention, 1.2 – COM-001 and COM-002 standards both read 3 months or 90 days for the retention of evidence. It is unclear as to why the retention has been doubled in this standard to 180 days for R2, M2 and R4, M4. For consistency and simplicity, 90 days should be used.	
Yes	
Although Manitoba Hydro is in general agreement with the standard, we have the following clarifying comments: (1) VSLs, R1 – the Severe category is missing the concept of 'The Responsible Entity did not implement four or more documented communication protocols as required in Requirement R1'. As written, it skips from 'three or more' to not implementing any of them. There is a gap if there is a Responsible Entity that failed to implement for example, 5 of the protocols. (2) VSLs, R3 – for readability, the first paragraph should be written 'The Responsible Entity did not address any parts of Requirement R3 in their documented communication protocols as required by Requirement R3.".	
(1) 'Reliability Directive' is referred to in R1, 1.1 of the COM-003-1 standard but is not currently a FERC approved definition, defined in the Glossary of Terms. (2) R1, 1.3 and Rationale and Technical Justification documents - reference is made to 'interface', which is not a defined term. Accordingly, its meaning is questionable. Consider removing or clarifying. (3) R1, 1.6 and 1.8 – requirement language is not consistent. For example, 'recipient' and 'receiver' are used but have the same meaning. Suggest beginning the requirements with the following text "Instances where….". (4) R2, R4 - the word 'periodically' should be inserted before 'assess' in each of these requirements for consistency with the Measures and VSLs, which refer to 'periodic assessments'. (5) R2, R4 - the phrase 'necessary to meet the expectations in its documented communication protocols' is ambiguous and will be difficult to interpret when assessing compliance. Is this statement to be the interpretation of the drafter of the protocols as to what is, in their opinion 'reasonably necessary'? (6) R3, 3.2 and 3.3 – requirement language is not consistent. For example, 'recipient' and 'receiver' are used but have the same meaning. Suggest beginning the requirements with the following text "Instances where….". (7) General Measures – there is lack of guidance with respect to both who the documentation is to be provided, and when. For example, periodically, upon request, etc. (8) M1 and M3 – ' / ' should be placed between the words 'and' and 'or'. (9) Section D, Compliance, 1.1 – the paraphrased definition of 'Compliance Enforcement Authority' from the Rules of Procedure is not the standard language for this section. Is there a reason that the standard CEA language is not being used?	
Individual	
Michiko Sell	
Grant County PUD	
Agree	
Seattle City Light	
Individual	
David Thorne	
Pepco Holdings Inc	
Agree	
Pepco Holdings Inc supports the comments submitted by EEI	
Group	
Arizona Public Service Company	
Janet Smith, Regulatory Affairs Supervisor	
Arizona Public Service Company	

Yes	
Yes	
Yes	
Individual	
Cheryl Moseley	
Electric Reliability Council of Texas, Inc.	

ERCOT recognizes and commends the drafting team's efforts to respond to industry comments and is supportive of draft 5 of COM-003-1. It should be clear in the definition and the standard that electronic systematic interchanges are not Operating Instructions. Please consider modifying the last sentence of the definition for Operating Instructions as below: "Discussions of general information and of potential options or alternatives to resolve BES operating concerns as well as electronic, system to system, interchanges are not commands and are not considered Operating Instructions." ERCOT ISO also maintains that the sub-requirements for R1 and R3 are not the "communication protocols" that FERC Order 693 and Blackout Recommendation #26 intended to be addressed as they are solely focused on "miscommunication". However, ERCOT ISO believes that the structure of COM-003-1, in allowing an entity to address subrequirements through development of its own documented communication protocols and identification of the instances of needing to use such protocols, allows for future revisions to focus on the subrequirements, as needed, leaving the construct in place to easily add, modify, or delete such parts as necessary through such subsequent revisions. An example of such a revision is where IRO-014-1 R1 has a similar construct and was modified to include an additional subrequirement (R1.7) in version 2. ERCOT believes that oral and written operator communication requirements should be in a single reliability standard and supports further refinement of the requirements and combining COM-002 and COM-003 into a single reliability standard.

Group	
SMUD/Balancing Authority of Northern California	
Joe Tarantino	
Sacramento Municipal Utility District	

SMUD would like to thank the Drafting Team for their efforts. While we agree with the intent of COM-003 SMUD believes the requirements R1.5 & R1.5 are too vague. Requiring the receiving party to repeat back the Operating Instruction only (emphasis added) if requested does not provide insurance that the receiving party would have a clear understanding of the necessary actions intended by the issuing party.

SMUD would like to thank the Drafting Team for their efforts. While we agree with the intent of COM-003 we would like the Drafting Team to provide input on a possible conflict between the Board approved COM-002-3 Requirement and Draft #5 of COM-003-1 Requirements R1, Part 1.7 & R3, Part 3.3. It appears that a "One-way" burst messaging that includes either oral or electronic Operating Instructions or Reliability Directives as depicted in the current COM-003 does not require practice of 3-way communication prior to taking action. Since COM-002 Requirement R2 specifies that the recipient "shall repeat, restate, rephrase, or recapitulate the Reliability Directive" it is unclear whether or not the receiving parties of a blast message adhering to the COM-003 Standards would be in compliance with COM-002 requirement R2.

Individual
Richard Vine
California ISO
Agree
The California ISO is supportive of those comments submitted by the SRC (ISO/RTO Council).
Group
Western Small Entity Comment Group
Steve Alexanderson
Central Lincoln
No
In the comment area of the last section as asked.
No
In the comment area of the last section as asked.
1) R3 (formerly R2) apparently now applies to all of a DP's or GO's operating communication expectations, and not just to Operating Instructions or Reliability Directives. We fail to see what Reliability objective is accomplished by entities presenting all their communication protocols for audit, when the only real reliability concern is if the entity responds appropriately to an Operating Instruction or Reliability Directive. Although 3.1, 3.2, and 3.3 deal only with Operating Instructions and Reliability Directives, R3 itself does not share this limitation. 2) We also note that by removing the "in a manner that identifies, assesses and corrects deficiencies" language, R3 becomes a zero defect requirement and an entity becomes subject to sanction for a single failure to implement the developed protocol. We don't believe this was the SDT's intent, but this was the effect of moving the language to R4. R4 is simply an additional separate requirement an entity must comply with. Taken together, we believe most auditors would look first to find failures to implement procedure under R3. If any failure was found, they would assign a violation and move on to R4 to look for evidence of corrective action following the occurrence. If none were found, a second violation would be assigned. 3) We suggest: "R3. Each Distribution Provider and Generator Operator shall develop and implement, in a manner that identifies, assesses and corrects deficiencies, documented communication protocols that outline the communications expectations for receipt of Operating Instructions and Reliability Directives by its operators," and that R4 be removed.
Individual
RoLynda Shumpert
South Carolina Electric and Gas
No
No
No
This standard is becoming overly complicated. The reason this COM standard is being developed is to reduce the possibility of miscommunication of information when the BES is being altered. This proposed standard is an administrative burden. Operators will be fearful that they will cause a NERC Compliance Violation every time they communicate. Their focus will be on communicating compliantly and not on operating the BES. Consideration should be given to simplifying this standard. Below is an unrefined proposal for consideration: R1: Applicable REs shall have a procedure that requires its personnel (whether as a receiver or as an initiator) to use three-part communication when altering the state of the BES. Three-part communication is defined as when an initiator issues a command, the receiver repeats the command back, and the initiator confirms. Any misunderstandings are resolved during the repeat back. (3-part communication is the only proven way to mitigate miscommunication. If personnel use three way communication then all issues related to alpha-numeric clarifiers, time, etc

should be resolved naturally during the repeat back/confirmation. Additionally, this requires operators and field personnel to remember one thing: when changing the state of the BES they must use 3-part communication.) R2: Each calendar month REs required to comply with R1 shall assess a random sample of communications that occurred over the month to ensure that three-way communication was properly being utilized, when the BES was being altered. In instances where deficiencies are found, REs shall require remedial training to be completed by the individuals involved in the deficient communication. (Remedial training will act as a deterrent for those who get lazy about using three-part communication. Additionally, peers will be aware of who had to undergo remedial training, which will further act as deterrent. Requiring remedial training would be an incentive to using three-part communication properly)
Individual
Brenda Frazer
Edison Mission Marketing & Trading
Yes
No
No
EMMT agrees with the concepts put forth in COM-003, but have some concerns, particularly with the proposed administrative burden associated with the Standard. EMMT offers the following comments: 1. R1.9 requires a TOP, BA, and RC to coordinate with affected RC, BA, TOP, DP and GOP communication protocols; this could result in a TOP having to coordinate with a hundred+ different entities communications protocols. This coordination would not improve reliability, but only serve to create confusion and significant communication time delays in real-time operations. Both R1 and R4 create significant documentation and administrative burdens, without providing a comparable improvement to the reliability of the BES. As reliability based Standard, COM-003 should focus on those actions that would have a direct impact on reliability, while minimizing the administrative burden. 2. R3 should end after the first sentence. GOPs do not issue Operating Instructions. They only receive instructions from others. GOPs should have a communications procedure as part of their operations, however, the methods used are properly business decisions made by the GOP. The content, thoroughness and effectiveness of a communications plan are excellent items to consider when assessing an entity's internal compliance program. 3. R4 raises the question of sufficiency of an entities corrective program. The RSAW requires the GO to turn over records of monitoring communications as well as records of corrective actions and then prove the "problem" is not still in place. This standard could easily turn into a high-profile audit target due to the varying concepts of what does and does not constitute a sufficient corrective action program. 4. EMMT recommends that the language to M4 be changed as follows: M4. Each Distribution Provider and Generator Operator shall provide the results of its periodic assessment and of any corrective actions (if any corrective actions were implemented) developed for Requirement R4. Examples of sufficient periodic assessment programs include, but are not limited to, the following: Documented review of voice logs for a total of at least one hour per calendar year for each operator (does not need to be a single session) Documented personal monitoring of communications for a total of at least one hour per calendar year for each operator (does not need to be a single session) Documented annual training Examples of sufficient corrective action programs include, but are not limited to, the following: Documented refresher training Documented meeting Documented "hot box" communication 5. The VSLs give a higher violation to a GOP than a BA for exactly the same error, even though the consequences with the BA are much greater. A GOP who fails to require 3-part responses when requested is tagged with a Moderate violation, while the BA would receive a Lower. 6. In the RSAW, the following passage should be expunged; "Where practicable, verify that deficient communication practice was indeed corrected by reviewing evidence of Operator communications (such as voice recordings) occurring after the date of the corrective action to determine if deficient communication practice was corrected." Differentiating between slips of the tongue and "deficient communication practices" involves subjective judgments. The same is true for attempting to identify changes in an operator's degree of understanding, especially when doing so through the numbing process of making before-

and-after voice recording comparisons. This is an open-ended matter that could very quickly become an unreasonable compliance burden. RSAWs in general should not introduce new requirements, measures or forms of evidence, so the GOP materials reviewed should be limited to the protocols/procedures of R3, and the assessment forms and corrective action reports of R4.

Group
ISO/RTO Standards Review Committee
Albert DiCaprio
PJM
No
No

The SRC recognizes and commends the Drafting Team's efforts to respond to Industry comments and to offer a revised pragmatic solution for this Project. The proposed changes do not create a common results-based standard that addresses let alone resolves any identified reliability problem. The SRC is concerned that the posting as proposed the standard creates a fill-in-the-blanks solution that could discourage a functional entity from employing anything more than a least common denominator solution. Technically the definition and proposal are improvements and the SRC would agree with the proposed changes, if the definition and proposal were needed. The issue is with the need for this definition, and the continuing debate this definition is generating. The SRC is opposed to having this term defined and added to the NERC Glossary. The term operating instruction does not need to be defined. For years, system operators deal with operating instructions on a daily if not minute-to-minute basis. Having a defined term, and calling such communication as "Command" is unnecessary, and potentially could confuse operators from what they understand to be the meaning of operating instructions. While the SDT has found that their previous definitions were not appropriate for a NERC standard, and the subsequent incremental changes are useful, the debate itself does not seem to be a productive use of the SDT's or the Industry's time. The SRC would prefer that the objectives of the SAR (communications protocols) be handled through means other than a Standard (e.g. the Operating Committee's Reliability Guidelines on Communications). The reason being, a standard requires zero-defect compliance, data retention, self-reporting, and requires these debates over the proposed terms such as "Operating instruction" which diverts the Industry, NERC and the Regional Entities from focusing on more productive reliability issues. The proposed RSAW wording must be more objective as the current test contains too many subjective requirements: Page 3 • "... Identification of instances ..." – will this be viewed as identification of every instance or will one instance be sufficient? • "...when....necessary..." – who decides when there is a necessity? The auditor or the functional entity? Page 4 • "...may include..." – this phraseology may be seen as meaning the listed following items are among the items that are required but are themselves insufficient to meet the requirement. Page 5 • "...reviews of System Operator voice recordings...: - it should be made clear that the "review" is of the sampled recordings used by the entity in its own self-assessments, and not a "review" of any voice recording. • "Where practicable" is subjective and inappropriate for a standard. To avoid confusion and misapplication of the standard, the RSAW should include a statement that messaging systems are not oral communication and not evaluated under the standard.

Group
ACES Standards Collaborators
Ben Engelby
ACES
Yes

(1) We appreciate the efforts of the drafting team in developing this standard and the steps the team took to resolve industry's concerns. (2) We continue to have concerns that the glossary term "Operating Instruction" overlaps with "Reliability Directive." The standard as written allows flexibility on how to deal with these two terms/situations and gives the registered entity the responsibility to

handle these types of communications in its protocol. Because of the flexibility and in the spirit of moving forward, we can support the approach by the drafting team that would allow NERC to address FERC concerns. This represents a good balance.
Yes
(1) We appreciate the drafting team allowing the registered entity to have the flexibility in determining the assessment methods and corrective actions to implement. Further, we appreciate that the measures for these requirements state that the assessment should be "periodic" but do not impose any strict timeline. We recommend that the RSAW state the same or similar language, as the entity should be able to dictate how often the assessments occur in their protocols, policies, and procedures.
No
(1) There are a few changes that need to be made in the severe VSLs for R1 and R3. The severe VSL states, "The Responsible Entity did not implement any documented communication protocols as required in Requirement R1." This statement is in direct conflict with the lower, medium and high VSLs because if an entity violated at least one documented communication protocol (low VSL), or two protocols (medium VSL), or three protocols (high VSL), then the entity violated "any." We recommend striking the statement in the severe VSL to avoid this conflict.
(1) The sub-parts of the protocols have grammatical errors, where the sub-parts do not correlate to the lead-in sentence. We recommend replacing the phrase "Require the recipient/receiver…" that is stated in sub-parts 1.6, 1.8, 3.2 and 3.3 with "Instances in which the recipient/receiver is required to…" in order to maintain consistency throughout the standard. Leaving these sections as mandates (verb phrases) could confuse auditors into thinking that these are zero defect requirements.
Individual
Scott Berry
Indiana Municipal Power Agency
No
The COM-003-1 standard needs to an independent document used to audit entities and the RSAW should not be used to address items not covered in the standard as to what is acceptable and what is not acceptable when it comes to instances when three-part communication is not properly followed by an entity during an audit. IMPA is concerned that an entity has one instance of a missed repeat back and per the entity's plan they address it and re-train for it; NERC could still call it a violation. The standard language needs to be clear about the latitude that an entity is given to work things out within their internal controls. The main item that the standard should do is to make sure that entities have communication plans and their internal controls within the communication plans contain a process to monitor and self-deal with corrective action of instances where its communication plan was not properly followed. This language needs to be clearly stated in the standard and not somewhat stated in the RSAW. IMPA believes the prior version of this draft standard was close when it used language on internal controls that stated "implement, in a manner that identifies, assesses, and corrects deficiencies…".
IMPA believes there is a conflict between COM-003-1 and COM-002-3 when it comes to how an entity replies back to an "All Call". COM-003-1 does not require three part communication and it seems that COM-002-3 does require it. This creates confusion and needs to be corrected. IMPA supports the use of one communication standard to address proper communication protocols for Directives and Operating Instructions. This could be accomplished by retiring COM-002-3 upon the implementation of COM-003-1.
Individual
Anthony Jablonski
ReliabiltyFirst
No
ReliabilityFirst abstains and offers the following comments for consideration: 1. Requirement R1 and

Requirement R3 - ReliabilityFirst questions the reasoning behind the term "where applicable" in the last sentence of Requirement R1 and Requirement R3. Can the SDT provide examples when there would be instances where an Entity would not need to address a sub-part within their documented communication protocols? ReliabilityFirst believes all sub-parts under Requirement R1 and Requirement R3 should be addressed within the respected protocols. 2.Requirement R1, Part 1.9 - ReliabilityFirst does not believe it is appropriate for Requirement R1, Part 1.9 to be addressed within the documented communication protocols. It is unclear how an entity would address "coordination" of its protocol within the protocol itself. ReliabilityFirst does agree with the concept of having the responsible entities be aware of each other's communication protocols and thus recommend elevating this to a stand-alone requirement. ReliabilityFirst recommends the following for consideration as a new R3, "Each Balancing Authority, Reliability Coordinator, and Transmission Operator shall make available its documented communication protocols that outline the communications expectations of its System Operators."
No
ReliabilityFirst abstains and offers the following comments for consideration: 1. Requirement R2 - ReliabilityFirst believes the concept of implementation of the method(s) to assess System Operators' communication should be added to the requirement. If the Entity is not required to implement the method(s), an Entity may never find any deficiencies and get to the point of implementing the corrective actions necessary to meet the expectations in its documented communication protocols. ReliabilityFirst recommends the following for consideration, "Each Balancing Authority, Reliability Coordinator, and Transmission Operator shall develop and implement method(s) to assess System Operators' communication practices and implement corrective actions necessary to meet the expectations in its documented communication protocols developed for Requirement R1." 2. Requirement R4 - Similar to the comment on Requirement R2, ReliabilityFirst believes the concept of implementation of the method(s) to assess System Operators' communication should be added to the requirement. ReliabilityFirst recommends the following for consideration, "Each Distribution Provider and Generator Operator shall develop and implement method(s) to assess operators' communication practices and implement corrective actions necessary to meet the expectations in its documented communication protocols developed for Requirement R3."
No
1. VSL for Requirement R1 - In order to capture instances where more than three parts were not addressed, the second VSL under the "High" category needs to be modified to state, "…did not implement three (3) or more of the nine (9) parts of…" 2. VSL for Requirement R2 - ReliabilityFirst recommends including a lower bounds around the "Medium VSL". As written, an entity would fall into the Medium VSL range if they only implemented 1% or implemented 49% of the corrective actions. ReliabilityFirst recommends gradating the VSLs using 25% increments across all four VSLs. 3. VSL for Requirement R4 - ReliabilityFirst recommends including a lower bounds around the "Medium VSL". As written, an entity would fall into the Medium VSL range if they only implemented 1% or implemented 49% of the corrective actions. ReliabilityFirst recommends gradating the VSLs using 25% increments across all four VSLs.
Group
PPL NERC Registered Affiliates
Brent Ingebrigtson
LG&E and KU Services
These comments are submitted on behalf of the following PPL Companies: Louisville Gas and Electric Company and Kentucky Utilities Company; PPL Electric Utilities Corporation, PPL EnergyPlus, LLC; and PPL Generation, LLC, on behalf of its NERC registered subsidiaries. The PPL Companies are registered in six regions (MRO, NPCC, RFC, SERC, SPP, and WECC) for one or more of the following NERC functions: BA, DP, GO, GOP, IA, LSE, PA, PSE, RP, TO, TOP, TP, and TSP The PPL Companies believe that the revised COM-003 standard represents an improvement over previous drafts. Nevertheless,

we have one concern with the proposed standard and urge the Standard Drafting Team to add the following note to Requirements 1.7, 1.8, and 3.3 in the standard before it is submitted to NERC and FERC for their approval: Notwithstanding anything in COM-002, the requirements set forth in COM-003 Requirements R1.7, R1.8 and R3.3 shall govern the manner for responding to Reliability Directives that are issued through one-way burst messages (e.g., an All Call system).
Individual
Kathleen Goodman
ISO New England Inc.
No
No
We do not believe a Standard is needed, given other developments: A. The SDT materials have not demonstrated the reliability gap/need for this Standard. Without having a better sense of what the scope of the actual reliability risks are (frequency, impact, etc…), it's difficult to know if the proposed solution – as embodied in COM-003 Draft Version 5 – is "necessary to provide for reliable operation of the bulk-power system". B. Moreover, the Requirements that the recipient repeat, restate, etc., if required/requested by the issuer (1.6 & 3.2) suggest that a RC, BA or TOP needs to ensure a repeat back or be non-compliant even though taking this extra time may, in fact, impact reliability. C. Lastly, the fact that the Ballot Body and Standard Drafting Team continue to have so many questions about how to interpret these requirements (see the recently issued FAQs) suggests: (a) that the Operating Committee would serve as a more effective forum for discussing what additional communication practices, if any, are needed, and (b) the requirements themselves may be unduly ambiguous. - Proposed Solution: We support strengthening communications protocols such as contained in the pending COM-002 revisions and in the OC White Paper. NERC Event Analysis Staff should work with the NERC OC to document the reported risks to the system, continue to monitor system operator performance, and periodically report on findings. If, however, it is determined that the Standard will move forward, then we would offer the following suggestions: A. We consider use of one-way burst messaging systems to be electronic and, as such, do not believe they should be included in the Standard. Further, in accordance with 1.5, a one-way burst messaging system is not a "oral two party, person-to-person Operating Instruction," which would further justify its exclusion. B. Draft Version 5's Requirements establish that each covered registered Entity shall develop its own communication protocol outlining the communications expectations of its operators. This has the potential for confusion as multiple Registered Entities within a single RC, BA or TOPs' footprint may establish different communication expectations. - Proposed Solution: The Requirements should establish that if the RC, BA or TOP establish a communication protocol for their System Operators, the RC, BA or TOP should share that protocol with Registered Entities operating within their footprint, those Registered Entities must follow the RC, BA or TOP's protocol, or adopt a consistent one for their company C. We agree with the SDT that the COM Standard need not employ a "zero tolerance/zero defect" approach, because NERC Enforcement need not monitor and assess every Operator-to-Operator communication. In Draft Version 5 (Measurements & RSAW), NERC, however, appears to adopt an approach of establishing "zero tolerance" around a Company's Internal Controls program. The RSAW states that registered entities must provide "evidence that corrective actions necessary to meet the expectations in its documented communication protocols… are taken" and "deficient communication practice was indeed corrected." - This type of approach to Standard drafting raises untested questions of how the Standard will be enforced, whether it is a "fill-in-the-blank"-type Standard, and whether a new "zero tolerance" enforcement approach to monitoring will, in fact, be maintained. - Proposed solution: Draft a Standard that sets performance based expectations and allow the ERO to use its enforcement discretion (e.g., through FFT and through review of internal control programs) to determine how stringently to audit and sanction.
Group
Florida Municipal Power Agency
Frank Gaffney
Florida Municipal Power Agency

No
FMPA prefers the prior version which had language on internal controls, e.g., "implement, in a manner that identifies, assesses and corrects deficiencies …". As stated, and by using the word "implement" which means: "carry out, accomplish; especially : to give practical effect to and ensure of actual fulfillment by concrete measures", means that each entity must have evidence ("concrete measures") of implementing its communications protocol at all times for every instance. Three part communication is watered-down by giving the entity the choice as to whether to follow three-part communication for: 1) all Operating Instructions; 2) for Reliability Directives only; or 3) something in between. Many entities, to manage compliance risk, will only require three-part communications for Reliability Directives in their communication protocols as a result. For reliability reasons, FMPA believes that three-part communication ought to be required for all Operating Instructions, but, at the same time, there should be some tolerance for mistakes through use of the CIP v5 internal controls language "implement, in a manner that identifies, assesses and corrects deficiencies …".
No
Use of the term "System Operators'" is ambiguous; does the requirement cause internal evaluation, or evaluation of neighboring System Operators? We assume the former and suggest adding "its" in front of "System Operators".
As commented on several times previously, FMPA will not vote Affirmative (or recommend an Affirmative vote) until the inconsistencies of COM-003-1 and COM-002-3 concerning Reliability Directives are resolved. For a Reliability Directive delivered by an "All Call", COM-003-1 does not require three part communication whereas COM-002-3 does. This inconsistency will only be a source of confusion during the very time when rapid response to communication is needed, which causes us to be concerned for reliability. FMPA continues to recommend retiring COM-002-3 as part of the implementation plan of COM-003-1 and fails to see a good reason not to do so. All that would need to be done is to retain the definition of Reliability Directive and include R1 of COM-002-3 into COM-003-1, and a slight modification to 1.5 of COM-003-1 to require confirmation of a Reliability Directive.
Individual
Marie Knox
MISO
Yes
While MISO is not opposed to the current version of COM-003-1, it remains concerned regarding the overlap between COM-002-3 and COM-003-1. As written, the definition of "operating instruction" encompasses "reliability directives". This overlap and the application of multiple separate standards to operator communications in general is likely to result in ambiguity and confusion. Further, that only certain sub-requirements of COM-003-1 also mention reliability directives further confuses the applicability of these standards. While the identified overlap and application is manageable, it is recommended that this overlap be addressed at the earliest opportunity. One clear, succinct standard that addresses both operator communications, whether reliability directives or operating instructions, is respectfully recommended.
Yes
We believe the drafting team found a very reasonable solution to meet a FERC directive for a situation that deals with managing the quality of the millions of operator communications that occur annually.
Yes
To avoid confusion and misapplication of the standard, the RSAW should include a statement that electronic messaging systems are not subject to compliance with this standard.
Individual
James R. Keller
Wisconsin Electric Power Company
Agree

Edison Electric Institute
Group
Southern Company - Southern Company Services, Inc.; Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing
Pamela R. Hunter
Southern Company Operations Compliance
No

Southern Company agrees with the new definition. Southern Company believes that Requirements R3 and R4 should be deleted. A. Southern Company believes that Requirements R3 and R4 (applicable to Distribution Providers ("DPs") and Generator Operators ("GOPs")) should be deleted from the proposed COM-003 standard because the burdens placed on Balancing Authorities ("BAs"), Reliability Coordinators ("RCs") and Transmission Operators ("TOPs") by Requirements R1 and R2: (a) sufficiently tighten communications protocols with DPs and GOPs, (b) render Requirements R3 and R4 administrative, unnecessary, and redundant, counter to FERC's objectives as implemented by the NERC Paragraph 81 Task Force, and (c) potentially expose some Registered Entities to double jeopardy violations of COM-003-1. Specifically, Requirement R1 provides that BAs, RCs, and TOPs must develop and implement documented communication protocols that (a) address instances where the issuer of an oral two-party communication Operating Instruction is required to confirm that the DP or GOP recipient's response was accurate or to reissue the Operating Instruction to resolve the misunderstanding (R1.5); and (b) to address coordination with affected DPs' and GOPs' communication protocols (R1.9). Requirement R2 further requires BAs, RCs, and TOPs to develop methods that assess communication practices and implement corrective actions necessary to meet the expectations outlined in these same protocols. Note that this assessment method would necessarily include assessment of the expectations included in the protocols regarding DPs and GOPs as required by R1.5 and R1.9. Meanwhile, proposed Requirement R3 would require the recipient DPs and GOPs to develop their own documented communications protocols that outline the communication expectations already addressed in the R1 protocols. [Note that the Rationale and Technical Justification for COM-003-1 specifies that Requirements R1 and R2 are addressed to entities that both issue and receive Operating instructions (BAs, RCs, and TOPs) whereas Requirements R3 and R4 are addressed to entities that only receive Operating Instructions.] Requiring DPs and GOPs in R3 to develop protocols outlining the communications expectations of its operators -- and requiring DPs and GOPs in R4 to assess those same operators' communications practices and implement corrective actions -- is redundant and unnecessary when those same expectations are already being documented by BAs, RCs, and TOPs in the R1 protocols, are already being coordinated with DPs and GOPs under R1.9, and are already being assessed and corrected by the BAs, RCs, and TOPs as required by R2. Therefore, requiring DPs and GOPs to go through the same motions simply creates another layer of documentation that strains limited resources and does little to enhance the reliability of the Bulk Electric System. B. These duplicative exercises created by Requirements R3 and R4 run counter to the objectives directed by FERC in Paragraph 81 of FERC's March 15, 2012 Order on NERC's proposed "Find, Fix, and Track" ("FFT") initiatives ("FFT Order") as implemented by the P 81 Task Force. In Paragraph 81 of the FFT Order, FERC noted that "some current requirements likely provide little protection for Bulk-Power System reliability or may be redundant." In complying with FERC's directives, the Paragraph 81 Task Force set out to identify standards that (a) do "little if anything, to benefit or protect the reliable operation of the BES" and (b) among other possible criteria, are either: "(a) Administrative in nature, do not support reliability, and are needlessly burdensome; or (b) Require responsible entities to develop documents that are not necessary to protect BES reliability; or (c) Impose documentation updating requirements that are out of sync with the actual BES operations, unnecessary, or duplicative; or (d) Redundant with another FERC-approved Reliability Standard requirement(s), the ERO compliance and monitoring program, or a governmental regulation." (See Paragraph 81 Task Force Technical White Paper.) With respect to this last criterion of redundancy, the Task Force specifically stated that it is "designed to identify requirements that are redundant with other requirements and are therefore unnecessary. Unlike the other criteria listed … in the case of redundancy, the task or activity itself may contribute to a reliable BES, but it is not necessary to have two duplicative requirements on the same or similar task or activity." (emphasis added). By creating duplicative requirements on both ends of a coordinated

communication scheme between issuing BAs/RCs/TOPs and recipient DPs/GOPs, the Standards Drafting Team is creating an unnecessary administrative burden that does "little, if anything, to benefit or protect the reliable operation of the BES." Even if it may be argued that requiring double coordination from both issuer and recipient somehow contributes to a reliable BES, "it is not necessary to have the two duplicative requirements on the same or similar task or activity." Proposed Requirements R3 and R4 would fit all of the criteria listed above that the Paragraph 81 Task Force is using to identify candidates for retirement and/or revision. C. Finally, the risk created by proposed Requirements R3 and R4 in conjunction with R1 and R2 is more than simple administrative duplication. For vertically integrated entities that are registered both as issuing BAs/RC/TOPs and recipient DPs/GOPs, the redundancy created by Requirement R3 and R4 could potentially expose them to double penalties for a single violation. Because of the duplicative documentation and coordination requirements in R1/R2 and R3/R4, an auditor could interpret a single instance where the communications protocol of an issuing BA/RC/TOP did not match up with the recipient DP/GOP as multiple violations. In such an instance, both the issuers and the recipients could conceivably be penalized because the issuer's communications protocols were not coordinated with the recipient's communications protocols and this lack of coordination was not assessed and remedied. If the Standards Drafting Team chooses not to delete Requirements R3 and R4, then Southern suggests that the following rewording of R3 and R4 would be beneficial. If the Standards Draft Team does not delete Requirement R3 and R4 in their entirety, then Southern suggests that R3 and R4 be reworded such that the entities work together to implement and coordinate one set of issuers' communications protocols (i.e., that of the BAs/RCs/TOPs) instead of two sets of both issuers' and recipients' protocols. This should help to "tighten" the communications protocols as directed in Order 693 and to mitigate some of the confusion and duplicative documentation that could arise from Requirements R3 and R4 as written: "R3. Each Distribution Provider and Generator Operator shall implement the documented communication protocols of its associated BA, RC, and TOP that define the communications expectations of R1. The documented communication protocols will address, where applicable, the following: [Violation Risk Factor: Low] [Time Horizon: Long-term Planning] …." and "R4. Each Distribution Provider and Generator Operator shall develop method(s) to assess its communications practices and implement corrective actions necessary to meet the expectations in the documented communications protocols developed for Requirement R1." Conforming revisions would also need to be made to the language in the Measures, VRFs, and VSLs as applicable.
No
See Southern's comments above regarding deletion and/or modification of R4. If R4 was not part of this question then Southern's answer would change to yes for this question. Additionally, GOPs do not issue Operating Instructions. They only receive instructions from others. GOPs should have a communications procedure as part of their operations. However, the methods used are proper business decisions made by the GOP. The content, thoroughness and effectiveness of a communications plan are excellent items to consider when assessing an internal compliance program.
No
We agree with the VRFs and VSLs for R1 and R2. As discussed above, R3 and R4 should not be part of the standard. To the extent R3 and R4 should be deleted or modified, the VRFs and VSLs should be modified accordingly.
See Southern's comments for R3 and R4 in the RSAW comments regarding use of the terms "Operator" and "operator". If Requirements R3 and R4 are neither deleted nor reworded as suggested above, then changes should be made in either the standard or the RSAW to make the two terms consistent and to clearly define the term "operator" if necessary.
Individual
Brett Holland
Kansas City Power & Light
Agree
Southwest Power Pool
Group
SPP Standards Review Group
Robert Rhodes
Southwest Power Pool

No
We suggest adding 'as determined by the Functional Entity' to R1 to clarify that the protocols are those specifically determined by the applicable responsible entity: 'The documented communication protocols will address, where applicable as determined by the Functional Entity, the following:' Is the intent of R1.3 for applicable entities to maintain a list of common name identifiers which must be utilized in communications with all affected entities? If so, a similar requirement (R18) in TOP-002-2 is currently proposed to be eliminated in TOP-002-3. Therefore it shouldn't be added back by this requirement. Can the drafting team be more specific as to exactly what is required in R1.3 without going overboard as in the existing wording? We understand the need to be sure that affected entities do not have any misunderstandings regarding the specific facility that is at issue. However, our experience does not indicate that this is a problem. If we can't relax R1.3, we suggest eliminating it altogether. The use of the term 'coordination' in R1.9 causes concern in determining exactly what is required to coordinate. This could become a compliance nightmare for applicable entities. We suggest replacing R1.9 with "Provide each affected Reliability Coordinator, Balancing Authority, Transmission Operator, Distribution Provider, and Generator Operator with its communication protocols."
No
We have concerns with the continued inclusion of Distribution Provider in the list of Applicable Entities. Although this is in response to a FERC directive, the risk that Distribution Providers present to the BES is minimal at best. Actions taken by Distribution Providers which impact the reliability of the BES, load shedding for example, are adequately covered under COM-002-3 which applies to emergency situations. There are also jurisdictional questions associated with FERC directing the inclusion of Distribution Providers. If the Distribution Provider must remain as an Applicable Entity, then we would propose deleting Distribution Provider from R3 and R4 and then follow with the addition of a new R5 and R6. R5. Each Distribution Provider that is the recipient of an oral Operating Instruction, other than Reliability Directives, shall: 5.1 Use the English language, unless another language is mandated by law or regulation. 5.2 Repeat, restate, rephrase, or recapitulate the oral Operating Instruction. 5.3 For oral Operating Instructions issued as a one-way burst message to multiple parties in a short time period (e.g. an All Call system), request clarification from the issuer if the communication is not understood. R6. Each Distribution Provider shall develop method(s) to assess operators' communication practices and implement corrective actions necessary to meet the expectations in Requirement R5.
No
While we understand the process that gets us to the point where the VRFs for R1 and R3 are Low and those for R2 and R4 are Medium, in this situation we question the logic of the process. If developing a document only deserves a low VRF then how can we logically say that not implementing the items contained in the document is a medium? What happens if the document is flawed? This appears to be an inverted pyramid. We suggest using Low for all requirements.
Our comments are listed with the specific question they address.
Individual
Larry Watt
Lakeland Electric
Agree
LAK supports FMPA comments
Individual
Andrew Z. Pusztai
American Tranmission Company
Yes
Yes
Yes

Requirement 1.9 requires "Coordination with affected Reliability Coordinators', Balancing Authorities', Transmission Operators', Distribution Providers', and Generator Operators' communication protocols." This requirement seems unnecessary since the requirements of COM-3-1 apply to all these entities. If everyone is adhering to the requirements of COM-3-1 then the need for coordination is redundant as it becomes automatic. If individual entities adopt slight nuances to this requirement, or are more restrictive then the requirement then coordination between every entity becomes extremely difficult.
Individual
Bob Thomas
Illinois Municipal Electric Agency
Agree
Florida Municipal Power Agency
Group
Santee Cooper
Terry L. Blackwell
SC Public Service Authority
The latest version of COM-003 introduces a potential conflict with COM-002 related to use of one-way burst messaging systems to issue a Reliability Directive. COM-002 does not allow for only those responses required in COM-003 but instead requires a full 3 way communication from all parties. This potentially sets up both the issuer and receiver for violating COM-002 if they respond to a one-way burst messaging RD as the requirements indicate in COM-003. In COM-003, the follow Requirements are included: R1.7 Instances where the issuer of an oral Operating Instruction or Reliability Directive using a one-way burst messaging system to communicate a common message to multiple parties in a short time period (e.g. an All Call system) is required to verbally or electronically confirm receipt from at least one receiving party. R1.8 Require the receiver of an oral Operating Instruction or Reliability Directive using a one-way burst messaging system to communicate a common message to multiple parties in a short time period (e.g. an All Call system) to request clarification from the issuer if the communication is not understood. R3.3 Require the receiver of an oral Operating Instruction or Reliability Directive using a one-way burst messaging system to communicate a common message to multiple parties in a short time period (e.g. an All Call system) to request clarification from the issuer if the communication is not understood. In other words, COM-003 allows one-way burst messaging to be used for Reliability Directives and prescribes: • issuer to confirm receipt from at least one receiving party • receiver to request clarification from the issuer if the communication is not understood
Individual
Mike Hirst
Cogentrix Energy Power Management
No
No
No
Regarding question #1, the SERC OC Review Group agrees with the definition of Operating Instruction. While we also can agree to the changes made to R1, we feel R3 in its entirety is unnecessary and duplicative. Removal of the word "develop" would eliminate double-jeopardy concerns. R3 could be acceptable if "develop and" are omitted and "as developed in R1" is inserted after "protocols" and before "that." It should be noted that this suggestion only applies to the sub-requirements in R1 that correspond to the proposed sub-requirements in R3. Regarding question #2,

R2 is acceptable and R4, as stated above for R3, is unnecessary and duplicative. Regarding question #3, we agree with the VRFs and VSLs for R1 and R2. Based on our previous comments, we do not agree with the need for R3 and R4, and therefore VRFs and VSLs for these requirements are not needed. 1. R1.9 requires a TOP, BA, and RC to coordinate with affected RC, BA, TOP, DP and GOP communication protocols; this could result in a TOP having to coordinate with a hundred+ different entities communications protocols. This coordination would not improve reliability, but only serve to create confusion and significant communication time delays in real-time operations. Both R1 and R4 create significant documentation and administrative burdens, without providing a comparable improvement to the reliability of the BES. As reliability based Standard, COM-003 should focus on those actions that would have a direct impact on reliability, while minimizing the administrative burden. 2. R3 should end after the first sentence. GOPs do not issue Operating Instructions. They only receive instructions from others. GOPs should have a communications procedure as part of their operations, however, the methods used are properly business decisions made by the GOP. The content, thoroughness and effectiveness of a communications plan are excellent items to consider when assessing an entity's internal compliance program. 3. R4 raises the question of sufficiency of an entities corrective program. The RSAW requires the GO to turn over records of monitoring communications as well as records of corrective actions and then prove the "problem" is not still in place. This standard could easily turn into a high-profile audit target due to the varying concepts of what does and does not constitute a sufficient corrective action program. 4. The SRT recommends that the language to M4 be changed as follows: M4. Each Distribution Provider and Generator Operator shall provide the results of its periodic assessment and of any corrective actions (if any corrective actions were implemented) developed for Requirement R4. Examples of sufficient periodic assessment programs include, but are not limited to, the following: Documented review of voice logs for a total of at least one hour per calendar year for each operator (does not need to be a single session) Documented personal monitoring of communications for a total of at least one hour per calendar year for each operator (does not need to be a single session) Documented annual training Examples of sufficient corrective action programs include, but are not limited to, the following: Documented refresher training Documented meeting Documented "hot box" communication 5. The VSLs give a higher violation to a GOP than a BA for exactly the same error, even though the consequences with the BA are much greater. A GOP who fails to require 3-part responses when requested is tagged with a Moderate violation, while the BA would receive a Lower. 6. In the RSAW, the following passage should be expunged; "Where practicable, verify that deficient communication practice was indeed corrected by reviewing evidence of Operator communications (such as voice recordings) occurring after the date of the corrective action to determine if deficient communication practice was corrected." Differentiating between slips of the tongue and "deficient communication practices" involves subjective judgments. The same is true for attempting to identify changes in an operator's degree of understanding, especially when doing so through the numbing process of making before-and-after voice recording comparisons. This is an open-ended matter that could very quickly become an unreasonable compliance burden. RSAWs in general should not introduce new requirements, measures or forms of evidence, so the GOP materials reviewed should be limited to the protocols/procedures of R3, and the assessment forms and corrective action reports of R4.

Group
Pacific Gas and Electric Company
Glenn Rounds
Pacific Gas and Electric Company
Yes
Yes
Yes
Draft 5 fails to address all of the communication gaps identified in the Standards Authorization Request (SAR), FERC Order 693 and the recommendations of the August 2003 Blackout Report. The draft as written does not require a consistent application of effective communications protocols but in turn requires each functional entity to develop their own protocols with insufficient guidance on how

to achieve better consistency.
Individual
Keith Morisette
Tacoma Power
No
Tacoma Power supports and strongly suggests reverting back to the Draft 2 definition, "Operating Communication — Communication of instruction to change or maintain the state, status, output, or input of an Element or Facility of the Bulk Electric System."
No
Tacoma Power supports Draft 2 - The requirement to establish communication protocols should be identical for BA, TO, RC, GO, and DP. To make different requirements for different functions is very confusing for those who perform multiple functions. Go back to basic "3-part communication" (and include an option for push-to talk). Remove fuzzy language such as "if requested". The Standard should leave it up to the Entity to establish their communication protocols and procedures based upon the type of communication systems they are using. This draft seems to trying to write the procedures for every type of possible communication equipment rather than set a standard for how to communicate.
No
Tacoma Power believes the Standard Drafting Team made Draft 5 overly complex and confusing for the System Operators and Operators to use. The Drafting Team needs to go back to the basics. The standard should apply to all, BA, TO, RC, GO and DPs alike. 1. Require all parties to develop Communication Protocols, train their operating personnel to use them, review their protocols annually and make improvements if necessary. 2. Require all parties to use "3-part communication" and forget the "oral two-party, person-to-person Operating Instruction" that has different requirements for GO and DP. All responsible entities should have the same requirements. The proposed Standard as written allows for the Instruction to be repeated back "if requested" by the issuer. This exception creates a "compliance" trap for the people communicating – remove it. BASIC 3-PART COMMUNICATION should include: * A System Operator or Operator shall issue an Operating Instruction * The person receiving the Operating Instruction shall repeat it back to the issuer, and/or request clarification if needed * The System Operator or Operator will acknowledge as correct and/or discuss clarifications as needed and agree on the final instruction. 3. We are not sure why "address nomenclature for Transmission interface Elements and Transmission interface Facilities" has replaced the term "common line identifiers." Entities should coordinate their communication protocols with the other Entities that they commonly communicate with and agree on: * Nomenclature for Lines and equipment * A common system for Alpha Numeric clarifiers * Use 24-hour clock and identify the time, time-zone and if day-light savings or standard time is in effect. System Operators and Operators are too busy to be put in the position of trying to maintain compliance with a standard that is so convoluted and confusing as to become a potential violation. Tacoma Power supports the original premise of the proposed COM-003 and the concept to separate the technical communication equipment requirements from communication protocol requirements but the drafting team has gone too far away from the intent of the standard by trying to make exceptions for too many different issues when they do not need to. Get back to the basics, i.e. Draft 2.
Individual
Gregory Campoli
NYISO
The text presented in the blue box for Requirement 1 should be incorporated into Requirement #1. If the requirement needs to be explained at this point, we recommend clarifying it in the text. In addition, by using this definition we have now introduced a list of controls that we will be audited

against. The requirement should simply be to have a procedure. The controls assessment can be addressed during the future RAI process. The current draft provides for a fill in the blank framework that allows for an entity to define what is applicable for its communication protocol. A better approach would be to state that an entity may include items from the list provided that the entity identifies them as critical. Then the entity would only be required to show what is critical to its operations, rather than having to prove what is not critical. The language in requirement 1.5 needs to be clarified. It is not clear on how an entity is required to 'confirm' the response was accurate. This could simply be a '2 part communication', where once the receiving entity repeats the instruction, the initiator may move on if he deems it correct. Or does the confirmation need to be 'confirmed' with the receiving party as in '3 part communications'? If the requirement is meant to initiate 2 part communication, the requirement should say that. If the requirement is meant for '3 part communication,' then we recommend utilizing the language from COM-002 R2 in place of Requirements 1.5 and 1.6.

Individual

Jason Snodgrass

Georgia Transmission Corporation

No

Georgia Transmission Corporation agrees with the new definition. Georgia Transmission Corporation believes that Requirements R3 and R4 should be deleted. A. Georgia Transmission Corporation does not agree with the use of the term "operators" with respect to the functional entity Distribution Providers for R3 and R4. This poses an incomprehensible requirement for non-vertically integrated entities that are registered as Transmission Owner's also serving as the DPs. NERC does not define or associate anywhere in the Functional Model or NERC registry the term Distribution Provider operator. Specifically, GTC would not understand how to comply with R3 or R4 because GTC does not have any operators yet we are registered as a DP for the functions we perform of our facilities which are directly connected to the BES. GTC believes that Requirements R3 and R4 (applicable to Distribution Providers ("DPs")) should be deleted from the proposed COM-003 standard, or else disassociate the term "operators" from the DP. B. Additionally, Georgia Transmission Corporation believes that Requirements R3 and R4 (applicable to Distribution Providers ("DPs") and Generator Operators ("GOPs")) should be deleted from the proposed COM-003 standard because the burdens placed on Balancing Authorities ("BAs"), Reliability Coordinators ("RCs") and Transmission Operators ("TOPs") by Requirements R1 and R2: (a) sufficiently tighten communications protocols with DPs and GOPs, (b) render Requirements R3 and R4 administrative, unnecessary, and redundant, counter to FERC's objectives as implemented by the NERC Paragraph 81 Task Force, and (c) potentially expose some Registered Entities to double jeopardy violations of COM-003-1. Specifically, Requirement R1 provides that BAs, RCs, and TOPs must develop and implement documented communication protocols that (a) address instances where the issuer of an oral two-party communication Operating Instruction is required to confirm that the response of any recipient entity such as a DP or GOP was accurate or to reissue the Operating Instruction to resolve the misunderstanding (R1.5); and (b) to address coordination with affected recipient entities' communication protocols (R1.9). Requirement R2 further requires BAs, RCs, and TOPs to develop methods that assess communication practices and implement corrective actions necessary to meet the expectations outlined in these same protocols. Note that this assessment method would necessarily include assessment of the expectations included in the protocols regarding any recipient entity as required by R1.5 and R1.9. Meanwhile, proposed Requirement R3 would require the recipient DPs and GOPs to develop their own documented communications protocols that outline the communication expectations already addressed in the R1 protocols. [Note that the Rationale and Technical Justification for COM-003-1 specifies that Requirements R1 and R2 are addressed to entities that both issue and receive Operating instructions (BAs, RCs, and TOPs) whereas Requirements R3 and R4 are addressed to entities that only receive Operating Instructions.] Requiring DPs and GOPs in R3 to develop protocols outlining the communications expectations of its operators -- and requiring DPs and GOPs in R4 to assess those same operators' communications practices and implement corrective actions -- is redundant and unnecessary when those same expectations are already being documented by BAs, RCs, and TOPs in the R1 protocols, are already being coordinated with recipient entities, such as DPs and GOPs under R1.9, and are already being assessed and corrected by the BAs, RCs, and TOPs as required by R2. Therefore, requiring DPs and GOPs to go through the same motions simply creates another layer of documentation that strains limited resources and does little to enhance the reliability of the Bulk

Electric System. C. These duplicative exercises created by Requirements R3 and R4 run counter to the objectives directed by FERC in Paragraph 81 of FERC's March 15, 2012 Order on NERC's proposed "Find, Fix, and Track" ("FFT") initiatives ("FFT Order") as implemented by the P 81 Task Force. In Paragraph 81 of the FFT Order, FERC noted that "some current requirements likely provide little protection for Bulk-Power System reliability or may be redundant." In complying with FERC's directives, the Paragraph 81 Task Force set out to identify standards that (a) do "little if anything, to benefit or protect the reliable operation of the BES" and (b) among other possible criteria, are either: "(a) Administrative in nature, do not support reliability, and are needlessly burdensome; or (b) Require responsible entities to develop documents that are not necessary to protect BES reliability; or (c) Impose documentation updating requirements that are out of sync with the actual BES operations, unnecessary, or duplicative; or (d) Redundant with another FERC-approved Reliability Standard requirement(s), the ERO compliance and monitoring program, or a governmental regulation." (See Paragraph 81 Task Force Technical White Paper.) With respect to this last criterion of redundancy, the Task Force specifically stated that it is "designed to identify requirements that are redundant with other requirements and are therefore unnecessary. Unlike the other criteria listed … in the case of redundancy, the task or activity itself may contribute to a reliable BES, but it is not necessary to have two duplicative requirements on the same or similar task or activity." (emphasis added). By creating duplicative requirements on both ends of a coordinated communication scheme between issuing BAs/RCs/TOPs and recipient DPs/GOPs, the Standards Drafting Team is creating an unnecessary administrative burden that does "little, if anything, to benefit or protect the reliable operation of the BES." Even if it may be argued that requiring double coordination from both issuer and recipient somehow contributes to a reliable BES, "it is not necessary to have the two duplicative requirements on the same or similar task or activity." Proposed Requirements R3 and R4 would fit all of the criteria listed above that the Paragraph 81 Task Force is using to identify candidates for retirement and/or revision. D. Finally, the risk created by proposed Requirements R3 and R4 in conjunction with R1 and R2 is more than simple administrative duplication. For vertically integrated entities that are registered both as issuing BAs/RC/TOPs and recipient DPs/GOPs, the redundancy created by Requirement R3 and R4 could potentially expose them to double penalties for a single violation. Because of the duplicative documentation and coordination requirements in R1/R2 and R3/R4, an auditor could interpret a single instance where the communications protocol of an issuing BA/RC/TOP did not match up with the recipient DP/GOP as multiple violations. In such an instance, both the issuers and the recipients could conceivably be penalized because the issuer's communications protocols were not coordinated with the recipient's communications protocols and this lack of coordination was not assessed and remedied. If the Standards Draft Team does not delete Requirement R3 and R4 in their entirety, then Georgia Transmission Corporation suggests that R3 be reworded such that the entities work together to implement and coordinate one set of issuers' communications protocols (i.e., that of the BAs/RCs/TOPs) instead of two sets of both issuers' and recipients' protocols. This should help to "tighten" the communications protocols as directed in Order 693 and to mitigate some of the confusion and duplicative documentation that could arise from Requirements R3 as written: "R3. Each Distribution Provider and Generator Operator shall implement the documented communication protocols of its associated BA, RC, and TOP that define the communications expectations of R1. The documented communication protocols will address, where applicable, the following: [Violation Risk Factor: Low] [Time Horizon: Long-term Planning] …." and "R4. In addition to the recommendation to eliminate for the reasons above, GTC still believes R4 prescribes elements of internal control language to which is not necessary due to the tightening of communications protocols for issuing entities within R1 and should still be eliminated under this alternate scenario.

No

See GTC's comments above regarding deletion of R4. GTC also believes the same logic can apply to R2 and recommends to be deleted. Additionally, see GTC's comments regarding the conflict with the drafting team's proposal to inadvertently define a new function for the DP "operators". Lastly, DPs do not issue Operating Instructions; DP field personnel only receive instructions from others.

No

We agree with the VRFs and VSLs for R1. As discussed above, R3 and R4 should not be part of the standard. To the extent R3 and R4 should be deleted or modified, the VRFs and VSLs should be modified accordingly.

If Requirements R3 and R4 are neither deleted nor reworded as suggested above, then changes should be made in the standard to clearly define the term "operator" or disassociate the term from

the DP function.
Group
Oklahoma Gas & Electric
Terri Pyle
Oklahoma Gas & Electric
Oklahoma Gas & Electric supports that comments submitted by the Southwest Power Pool and submits its own comments as well.
No
Comment for R1.3: Is the intent of R1.3 for applicable entities to maintain a list of common name identifiers which must be utilized in communications with all affected entities? If so, a similar requirement (R18) in TOP-002-2 is currently proposed to be eliminated in TOP-002-3. Therefore, it shouldn't be added back by this requirement. Can the drafting team be more specific as to exactly what is required in R1.3 without going overboard as in the existing wording? We understand the need to be sure that affected entities do not have any misunderstandings regarding the specific facility that is at issue. However, our experience does not indicate that this is a problem. If we can't relax R1.3, we suggest eliminating it altogether since we believe this not does significantly impact the reliability of the BES. Comment for R1.9: The use of the term 'coordination' in R1.9 causes concern in determining exactly what is required to coordinate. This could become a compliance nightmare for applicable entities. We suggest replacing R1.9 with "Provide each affected Reliability Coordinator, Balancing Authority, Transmission Operator, Distribution Provider, and Generator Operator with its communication protocols."
No
We believe that R2 and R4 should already be covered in PER-005
No
While we understand the process that gets us to the point where the VRFs for R1 and R3 are Low and those for R2 and R4 are Medium; however, in this situation we question the logic of the process. If developing a document only deserves a Low VRF then how can we logically say that not implementing the items contained in the document is a Medium? What happens if the document is flawed? We suggest using Low for all requirements.
• We believe that this proposed Standard (COM-003-1) meets the intent of Paragraph 81 of the FERC Order which notes that reliability standards that provide little protection to the reliable operations of the BES are redundant or unnecessary. Although blackout occurrences in the past points to communication issues, we believe it is not related to miscommunication. Instead, we believe it is due to lack of communication and communicating information that was incorrect to begin with. • In the Consideration of Comments from the Feb 14-15 conference, the SDT said "The OPCPSDT maintains its position that three-part communication be addressed in documented communication protocols, where applicable." OG&E believes that while the opinions of the members of SDT are important, the SDT itself should not maintain a "position" as such. Rather, the SDT should attempt to merge direction from FERC with the comments from industry instead of rejecting industry comments out of hand. Per the Standards Process Manual (pg.9), the roles of drafting teams are: o Drafts proposed language for the Reliability Standards, definitions, Variances, and/or Interpretations and associated implementation plans. o Solicits, considers, and responds to comments related to the specific Reliability Standards development project. o Participates in industry forums to help build consensus on the draft Reliability Standards, definitions, Variances, and/or Interpretations and associated implementation plans. o Assists in developing the documentation used to obtain governmental approval of the Reliability Standards, definitions, Variances, and/or Interpretations and associated implementation plans.
Group
Luminant
Brenda Hampton
Luminant Energy Company LLC
Edison Electric Institute (EEI)
No
All comments are shown in response to Question 4.
Yes

No
All comments are shown in response to Question 4.
Luminant is generally supportive of the direction of this standard and agrees that requiring a documented communication protocol and monitoring processes is the correct approach for this standard. While we understand the need for the some Registered Entities (RE) to use a one-way burst messaging system to make mass communication quicker and easier the inclusion of Reliability Directive in R1.7, R1.8 and R3.3 creates a conflict COM-002-3 R2 and R3. By including Reliability Directives in R1.7, R1.8 and R3.3 which allows and electronic response or only one receipt to restate, the receiving REs will not be able to comply with COM-002-3 R2 that requires EACH recipient of a Reliability Directive to repeat, restate, rephrase or recapitulate the Reliability Directive. Removing Reliability Directive from those section would eliminate any confusion and conflict between COM-002-3 and COM-001-3 and allow COM-001-3 to be passed and implemented. Alternatively, COM-002-3 could be revised to CLEARLY STATE that it only applies to one-on-one verbal (or written?) communication.
Individual
Bradley Collard
Oncor Electric Delivery Company LLC
No
Oncor believes the specificity in the subparts of R1 is unnecessary. Three-part communication is the preferred method for ensuring that both parties understand an Operating Instruction and it provides a sufficient mechanism for clear, concise and accurate communication. In creating a protocol that requires System Operators to essentially relearn the way to speak (specifically using alpha-numeric identifiers) will only create confusion and inefficiency as operators try to follow protocol and catch/correct themselves.
No
Oncor supports the shift in compliance to the internal controls approach and we look forward to NERC providing a programmatic/principles framework in a collaborative approach with the industry. In the absence of this framework, it is unknown how the concept of "assess and correct" will evolve. As the framework is developed including the "assess and correct" concept, Oncor requests that continuous focus be placed on implementing principles including this concept and not requiring or specifying internal controls which would place additional compliance burden on entities. The internal controls principles/framework should enable entities to establish internal controls model utilizing deficiency correction approach but should not mandate the approach at the Standard/Requirement level. Internal Controls Program needs to be defined by an Entity, it is not a "One Size Fits All". The standards/RSAWs should reflect this understanding. Oncor does not see how the Drafting Team adequately addressed this concern. NERC and the rest of the industry should work together and define the framework around Internal Controls.
Yes
R1.9 states that entities will address "Coordination with affected Reliability Coordinators', Balancing Authorities', Transmission Operators', Distribution Providers', and Generator Operators' communication protocols." Coordination with these entities in the ERCOT market will become cumbersome. Is it the SDT's intent to ensure all communication protocols are coordinated with multiple entities that a Transmission Operator communicates with, including the RC, BA, other TOs, GOPs, and DPs? Oncor is unclear how an entity with multiple registrations would communicate with itself in different functions. Would this require an entity with multiple registration functions to designate personnel by functional entity and in turn, personnel would have to identify which functional entity each person they interface with? It is impractical and inefficient to require Entities to re-organize all personnel which would foster an inefficient structure and could potentially lead teams to not communicate effectively. In addition, this could have a negative impact on communications between companies. For example, in the ERCOT region, there are approximately 15 local control centers and ERCOT who are all registered as TOPs. One might interpret communications between neighboring TOPs or ERCOT and one of the local control centers are not subject to the requirements

of COM-003-1 since these are TOP to TOP communications. We strongly recommend the SDT review this to greatly simplify COM-003-1. Potential alternative to the current language would be "require entities to implement, in a manner …, protocols that include three-part communication for Operating Instructions" and eliminate the reference to Functional Entity.
Group
Tennessee Valley Authority
Dennis Chastain
Tennessee Valley Authority
SERC OC Standards Review Group
No
We agree with the definition of Operating Instruction. While we also can agree to the changes made to R1, we feel R3 in its entirety is unnecessary and duplicative. Removal of the word "develop" would eliminate double-jeopardy concerns. R3 could be acceptable if "develop and" is omitted and "as developed in R1" is inserted after "protocols" and before "that." It should be noted that this suggestion only applies to the sub-requirements in R1 that correspond to the proposed sub-requirements in R3.
No
R2 is acceptable and R4, as stated above for R3, is unnecessary and duplicative.
No
We agree with the VRFs and VSLs for R1 and R2. Based on our previous comments, we do not agree with the need for R3 and R4, and therefore VRFs and VSLs for these requirements are not needed.
TVA Nuclear Power's Human Performance program is driven by INPO and includes 1) requirements for operations to use 3-way communication and the phonetic alphabet; and 2) a documented assessment process via an established observation program with corrective actions. Any additional oversight process will contribute to distraction in the control room and promote overreliance on process and procedure with a "checklist mentality" rather than focus on potential impacts of the task being performed. If the RC, TOP, or BA specifically requests confirmation of a verbal communication (R1.6), our nuclear plant operators will respond accordingly as they are already expected to do. The use of "periodic assessment" in the measurements does not provide adequate guidance in the development of consistent, effective measures of compliance.
Individual
Jose H Escamilla
CPS Energy
Yes
No
Distribution Providers (DP) may be co-located in the same room with Transmission Operators (TOP) and would have oral communications and not use a telephone or other messaging system. Generator Operators (GOP) should have a separate standard.
No
I do not agree with the requirements, therefore I do not agree with the VRF's and VSL.
Separate the Distribution Provider (DP) and Generator Operator (GOP) COM requirements into a separate standard.
Group
Bonneville Power Administration
Jamison Dye
Transmission Reliability Program
Yes
Yes

Yes		
Individual		
Daniel Duff		
Liberty Electric Power		
Agree		
Generator Forum Standards Review Team		
Individual		
Banagalore		
Vijayraghavan		
The primary reason for a no vote is that Draft 5 fails to address the communication gaps identified in the Standards Authorization Request (SAR), FERC Order 693 and the recommendations of the August 2003 Blackout Report. The draft as written does not require a consistent application of effective communications protocols but in turn requires each functional entity to develop their own protocols with insufficient guidance on how to achieve better consistency.		
No		
No		
No		
Individual		
Tony Kroskey		
Brazos Electric Power Cooperative, Inc.		
Agree		
ACES Power Marketing.		
Individual		
Russ Schneider		
Flathead Electric Cooperative, Inc.		
Agree		
Western Small Entity Comment Group submitted by Central Lincoln		