

## Consideration of Comments on Reliability Coordination — Project 2006-06

The Reliability Coordination Drafting Team thanks all commenters who submitted comments on the proposed revisions to COM-001-2, IRO-001-2, IRO-002-2 and IRO-005-4. These standards were posted for a 30-day public comment period from February 25, 2011 through March 7, 2011. The stakeholders were asked to provide feedback on the standards through a special Electronic Comment Form. There were 41 sets of comments, including comments from more than 168 different people from approximately 112 companies representing 9 of the 10 Industry Segments as shown in the table on the following pages.

[http://www.nerc.com/filez/standards/Reliability\\_Coordination\\_Project\\_2006-6.html](http://www.nerc.com/filez/standards/Reliability_Coordination_Project_2006-6.html)

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Vice President and Director of Standards, Herb Schrayshuen, at 609-452-8060 or at [herb.schrayshuen@nerc.net](mailto:herb.schrayshuen@nerc.net). In addition, there is a NERC Reliability Standards Appeals Process.<sup>1</sup>

### Summary Consideration:

The RCSDT thanks all stakeholders for their comments. Many stakeholders provided comments suggesting revisions to the standards. Many of these suggestions were incorporated into the standards. As a result of the revisions, the RCSDT is moving COM-001-2, COM-002-3 and IRO-001-2 to a successive ballot. The RCSDT made a few clarifying edits to the remaining standards based on stakeholder comments. Therefore, IRO-002-3, IRO-005-4 and IRO-014-2 are being moved to recirculation ballot. Because of this approach, the SDT will be proposing an interim change to IRO-001: the elimination of Requirement R7, as it is duplicative of one of the requirements in IRO-014-2.

For the COM-001 standard, several commenters had suggestions for improvements to the requirement language and applicability. The RCSDT believes the standard correctly and adequately requires each applicable entity that would have capability to receive Interconnection and operating information to have Interpersonal Communications and Alternative Interpersonal Communications to be used when the Interpersonal Communication is not available. The RCSDT has addressed the applicability of the standards and implementation plans by aligning COM-001-2, and COM-002-3 to include the same entities and by removing LSE, PSE and TSP from the COM standards.

Many comments were concerned about both the medium (e.g. cellular, satellite, etc.) and media (e.g. voice, email, etc.) used for Interpersonal Communications. The current language avoids being prescriptive and allows each entity to determine what is suitable. Interpersonal Communication and Alternative Interpersonal Communication is between the applicable entities which may include multiple locations (e.g. a primary and back-up control center).

The RCSDT added the following Requirement Parts at the suggestion of stakeholders:

- 3.5 Adjacent Transmission Operators synchronously connected within the same Interconnection
- 4.3 Adjacent Transmission Operators synchronously connected within the same Interconnection
- 5.6 Adjacent Balancing Authorities
- 6.3 Adjacent Balancing Authorities

The RCSDT agrees with the many industry comments and removed the phrase "to exchange Interconnection and operating information" in requirements R1 through R8. This removal clarifies that the intent of this capability is NOT for the exchange of data.

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

A few commenters also expressed concerns about the frequency of testing Alternative Interpersonal Communications capability. The RCSDT believes that the proposed testing frequency is supported by the majority of stakeholders and is not overly burdensome.

Several commenters suggested that VSLs should be written based on the percent of entities rather than by an occurrence of a violation. VSLs must be written on a violation occurrence basis in accordance with FERC guidelines. The requirements specify which entities must be included in communications capabilities. If a single entity is missing, this is a violation of the requirement. According to VSL guidelines, if missing any part of the requirement could have the same reliability outcome as missing the entire requirement, the requirement is binary and the VSL must be severe.

A new requirement was added to COM-001 for clarity regarding responsibilities of the Distribution Provider and the Generator Operator when either entity experiences a failure of its Interpersonal Communication capability:

R11. Each Distribution Provider and Generator Operator that experiences a failure of any of its Interpersonal Communication capabilities shall consult with its Transmission Operator or Balancing Authority as applicable to determine a mutually agreeable time to restore the Interpersonal Communication capability. *[Violation Risk Factor: Medium][Time Horizon: Real-time Operations]*

This requirement requires collaboration between entities to restore a failed communications capability.

The RCSDT asked stakeholders if they believed that the requirements of TOP-001-1 obviate the need to develop additional requirements to address Xcel's comment as directed in FERC Order 693. The original justification that the RCSDT posited for not adding a requirement to directly address Xcel Energy's comments in paragraph 516 and FERC's related recommendation in paragraph 523 was that TOP-001-1 R3 was considered to address this concern. Since that time, the RTO SDT has proposed to retire TOP-001-1 R3. However, NERC has since retired IRO-004-1 R3 and R5 along with IRO-005-3 R5. Because these are retired, there are no longer any requirements that would force a TOP to wait for a delayed RC response during an emergency. Therefore the question is resolved, albeit differently than it was proposed to be resolved in this posting. If an RC were to give a Reliability Directive to a TOP that the TOP considered "would violate safety, equipment, regulatory, or statutory requirements," the TOP may respond to the RC that it cannot comply.

Stakeholders were asked if they agree with the revision to IRO-001, R1 for certifying Reliability Coordinators. Many commenters suggested removing the requirement because it is addressed in the NERC Rules of Procedure. The RCSDT concurs and has removed R1 from IRO-001-2.

A significant revision to IRO-001-2 was made by removing the Interchange Coordinator from the standard. The RCSDT made this revision because the Balancing Function is responsible for implementing interchange (see NERC Reliability Functional Model, version 5, page 32, item 7) and to operate the Balancing Authority Area to maintain load-interchange-generation balance (item 3).

The RCSDT asked stakeholders if they agree with moving two requirements from IRO-001 back to IRO-002 relating to Analysis Tool outages. All stakeholders that responded agreed and there were no comments received.

The RCSDT asked stakeholders if they agree with moving two requirements from IRO-001 back to IRO-005 relating to Reliability Coordinator notifications. Several commenters noted a typographical error in R1 which was corrected to read:

When the results of an Operational Planning Analysis or Real-time Assessment indicate an expected or actual condition with Adverse Reliability Impacts within its Reliability Coordinator Area, each Reliability Coordinator shall notify ~~issue an alert to~~ all impacted Transmission Operators and Balancing Authorities in its Reliability Coordinator Area. *[Violation Risk Factor: High] [Time Horizon: Real-time Operations, Same Day Operations and Operations Planning]*

One commenter also asked that an errant yellow text box be removed from Page 1, which was also done.

The RCSDT received a number of comments regarding the applicability of COM-001, and COM-002. The RCSDT agrees with these comments and has removed PSE and LSE from the COM-001-2 implementation plan. The RCSDT also addressed minor issues involving typos, formatting and style.

The RCSDT received comments suggesting clarification of COM-002-3. The RCSDT intends the communication of Reliability Directives to be person-to-person and in such a manner that the Reliability Directive is understood and not necessarily repeated verbatim. COM-002-3 is not intended to be prescriptive on how the Reliability Directive is issued. Spoken or written communications are valid methods (i.e. using the telephone, radio, electronic texting, email, etc.). The purpose of COM-002-3 is to ensure emergency communications between operating personnel are effective. There is no proxy requirement for 24/7 operating personnel regarding small entities. Only “capability” as provided for in COM-001-2 is applicable. The RCSDT agrees that the use of Blast Calls to issue Reliability Directives, in mass, is efficient and effective. The RCSDT believes Reliability Directives issued in mass should be defined by procedure, and that the procedure would establish a method of affirmation and notice of implementation. As envisioned, communications protocols would be addressed in the COM-003 standard being developed in Project 2007-02.

Some commenters suggested revisions to IRO-014, requirement R8 to conform to similar requirements R6 and R7. The RCSDT made the suggested revision by re-ordering R8:

R8. During those instances where Reliability Coordinators disagree on the existence of an Adverse Reliability Impact, each Reliability Coordinator shall implement the action plan developed by the Reliability Coordinator that identified the Adverse Reliability Impact unless such actions would violate safety, equipment, regulatory or statutory requirements. [Violation Risk Factor: High][Time Horizon: Operations Planning, Same Day Operations and Real-time Operations]

IRO-014-2, requirement R4 is applicable to those Reliability Coordinators engaged in activities related to requirement R1 and part 1.7. It is unlikely that Reliability Coordinators geographically and electrically distant from one another will have mutually agreed upon operating procedures (per requirement R1), and therefore requirement R4 would not be applicable. The RCSDT believes IRO-014-2, requirement R4 (which requires weekly communication) provides reasonable contact and flexibility – and this requirement is in effect today.

The RCSDT coordinated the use of the NERC Glossary term “Adverse Reliability Impact” with the Real-Time Operations team and continues the practice of informing all RCs of Adverse Reliability Impacts in requirement R5.

The RCSDT has revised IRO-014-2, requirements R6-R8 to clarify that when one RC identified a problem and presents an action plan for another RC, the second RC is obligated to implement the action plan. The RCSDT will forward the concern about RC's identifying themselves and the receiver to establish authority to the Project 2007-02, Operating Personnel Communications Protocols SDT. The Project 2007-02 team is developing a standard that includes requirements for use of specific communications protocols.

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**Consideration of Comments on Reliability Coordination — Project 2006-06**

The Industry Segments are:

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

Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
1.	Group	Guy Zito	Northeast Power Coordinating Council										X
Additional Member		Additional Organization	Region	Segment Selection									
1.	Alan Adamson	New York State Reliability Council, LLC	NPCC	10									
2.	Gregory Campoli	New York Independent System Operator	NPCC	2									
3.	Kurtis Chong	Independent Electricity System Operator	NPCC	2									
4.	Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1									
5.	Bohdan M. Dackow	US Power Generating Company (USPG)	NPCC	NA									
6.	Chris de Graffenried	Consolidated Edison Co. of New York, Inc.	NPCC	1									
7.	Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10									
8.	Dean Ellis	Dynegy Generation	NPCC	5									
9.	Brian Evans-Mongeon	Utility Services	NPCC	8									
10.	Mike Garton	Dominion Resources Services, Inc.	NPCC	5									
11.	Brian L. Gooder	Ontario Power Generation Incorporated	NPCC	5									
12.	Kathleen Goodman	ISO - New England	NPCC	2									
13.	Chantel Haswell	FPL Group, Inc.	NPCC	5									
14.	David Kiguel	Hydro One Networks Inc.	NPCC	1									
15.	Michale R. Lombardi	Northeast Utilities	NPCC	1									

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Group/Individual	Commenter	Organization	Registered Ballot Body Segment												
			1	2	3	4	5	6	7	8	9	10			
16. Rnady MacDonald	New Brunswick System Operator	NPCC 2													
17. Bruce Metruck	New York Power Authority	NPCC 6													
18. Lee Pedowicz	Northeast Power Coordinating Council	NPCC 10													
19. Robert Pellegrini	The United Illuminating Company	NPCC 1													
20. Si Truc Phan	Hydro-Quebec TransEnergie	NPCC 1													
21. Saurabh Saksena	National Grid	NPCC 1													
22. Michael Schiavone	National Grid	NPCC 1													
23. Peter Yost	Consolidated Edison co. of New York, Inc.	NPCC 3													
24. Ben Wu	Orange and Rockland Utilities	NPCC 1													
2.	Group	Ron Sporseen	PNGC Power member owners			X		X					X		
	<b>Additional Member</b>	<b>Additional Organization</b>	<b>Region</b>	<b>Segment</b>	<b>Selection</b>										
1.	Bud Tracy	Blachly-Lane Electric Cooperative	WECC	3											
2.	Dave Markham	Central Electric Cooperative	WECC	3											
3.	Dave Hagen	Clearwater Power	WECC	3											
4.	Roman Gillen	Consumer's Power Inc.	WECC	1, 3											
5.	Roger Meader	Coos-Curry Electric Cooperative	WECC	3											
6.	Dave Sabala	Douglas Electric Cooperative	WECC	8											
7.	Bryan Case	Fall River Electric Cooperative	WECC	3											
8.	Rick Crinklaw	Lane Electric Cooperative	WECC	3											
9.	Michael Henry	Lincoln Electric Cooperative	WECC	3											
10.	Richard Reynolds	Lost River Electric Cooperative	WECC	8											
11.	Jon Shelby	Northern Lights	WECC	3											
12.	Ray Ellis	Okanogan Electric Cooperative	WECC	8											
13.	PNGC Power	Rick Paschall	WECC	8											
14.	Heber Carpenter	Raft River Electric Cooperative	WECC	3											
15.	Ken Dizes	Salmon River Electric Cooperative	WECC	1, 3											
16.	Steve Eldrige	Umatilla Electric Cooperative	WECC	1, 3											
17.	Marc Farmer	West Oregon Electric Cooperative	WECC	8											

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Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
3.	Group	Denise Koehn	Bonneville Power Administration	X		X		X	X				
<b>Additional Member</b>		<b>Additional Organization</b>	<b>Region</b>	<b>Segment Selection</b>									
1.	Paul Blake	BPA, Transmission Control Center PSC	WECC	1									
2.	Tedd Snodgrass	BPA, Transmission Dispatch	WECC	1									
4.	Group	Brenda Truhe	PPL	X									
<b>Additional Member</b>		<b>Additional Organization</b>	<b>Region</b>	<b>Segment Selection</b>									
1.	Annette Bannon	PPL Generation	RFC	5									
2.	Annette Bannon	PPL Generation	WECC	5									
3.	Mark Heimbach	PPL EnergyPlus	MRO	6									
4.	Mark Heimbach	PPL EnergyPlus	NPCC	6									
5.	Mark Heimbach	PPL EnergyPlus	RFC	6									
6.	Mark Heimbach	PPL EnergyPlus	SERC	6									
7.	Mark Heimbach	PPL EnergyPlus	SPP	6									
8.	Mark Heimbach	PPL EnergyPlus	WECC	6									
5.	Group	Patricia Hervochon	PSEG	X		X		X	X				
<b>Additional Member</b>		<b>Additional Organization</b>	<b>Region</b>	<b>Segment Selection</b>									
1.	Kenneth Brown	PSE&G	RFC	1									
2.	Jeffrey Mueller	PSE&G	RFC	3									
3.	Kenneth Petroff	PSEG Nuclear	RFC	5									
4.	Peter Dolan	PSEG ER&T	RFC	6									
6.	Group	Louis Slade	Dominion	X		X		X	X				
<b>Additional Member</b>		<b>Additional Organization</b>	<b>Region</b>	<b>Segment Selection</b>									
1.	Mike Garton		MRO										
2.	Connie Lowe		SERC										
3.	Michael Gildea		ERCOT										

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Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
7.	Group	Jim Case	SERC OC Standards Review Group	X		X							
<b>Additional Member Additional Organization Region Segment Selection</b>													
1.	Rene' Free	Santee Cooper	SERC	1, 3, 5, 9									
2.	Glenn Stephens	Santee Cooper	SERC	1, 3, 5, 9									
3.	Gerry Beckerle	Ameren	SERC	1, 3									
4.	Tim Hattaway	PowerSouth	SERC	1, 3, 5, 9									
5.	Mike Hardy	Southern	SERC	1, 3, 5									
6.	Joel Wise	TVA	SERC	1, 3, 5, 9									
7.	Jake Miller	Dynegy	SERC	5									
8.	Eugene Warnecke	Ameren	SERC	1, 3									
9.	Andy Burch	EEI	SERC	1, 5									
10.	Gene Delk	SCE&G	SERC	1, 3, 5									
11.	Robert Thomasson	BREC	SERC	1, 3, 5, 9									
e1 2.	Brad Young	LGE/KU	SERC	1, 3, 5									
13.	Marc Butts	Southern	SERC	1, 3, 5									
14.	Larry Rodriguez	Entegra Power	SERC	5									
15.	Alvis Lanton	SIPC	SERC	1, 3, 5									
16.	Randall Haynes	Alcoa	SERC	1, 5									
17.	Connie Lowe	Dominion VP	SERC	1, 3									
18.	Melinda Montgomery	Entergy	SERC	1, 3									
19.	Mike Oatts	Southern	SERC	1, 3, 5									
20.	Jason Marshall	MISO	SERC	2									
21.	John Troha	SERC	SERC	10									
8.	Group	Albert DiCaprio	IRC Standards Review Committee		X								
<b>Additional Member Additional Organization Region Segment Selection</b>													
1.	Patrick Brown	PJM	RFC	2									
2.	Matt Goldberg	ISO-NE	NPCC	2									



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Group/Individual		Commenter		Organization		Registered Ballot Body Segment									
						1	2	3	4	5	6	7	8	9	10
3.	Dan Rochester	IESO	NPCC	2											
4.	Steve Myers	ERCOT	ERCOT	2											
5.	Mark Thompson	AESO	WECC	2											
6.	Greg Van Pelt	CAISO	WECC	2											
7.	Charles Yeung	SPP	SPP	2											
8.	Terry Bilke	MISO	RFC	2											
9.	Greg Campoli	NYISO	NPCC	2											
10.	Kathleen Goodman	ISO-NE	NPCC	2											
11.	Ben Li	IESO	NPCC	2											
12.	Jason Marshall	MISO	RFC	2											
13.	Don Weaver	NBSO	NPCC	2											
9.	Group	Carol Gerou	MRO's NERC Standards Review Subcommittee												X
	<b>Additional Member</b>	<b>Additional Organization</b>	<b>Region</b>	<b>Segment Selection</b>											
1.	Mahmood Safi	Omaha Public Utility District	MRO	1, 3, 5, 6											
2.	Chuck Lawrence	American Transmission Company	MRO	1											
3.	Tom Webb	Wisconsin Public Service Corporation	MRO	3, 4, 5, 6											
4.	Jason Marshall	Midwest ISO Inc.	MRO	2											
5.	Jodi Jenson	Western Area Power Administration	MRO	1, 6											
6.	Ken Goldsmith	Alliant Energy	MRO	4											
7.	Alice Ireland	Xcel Energy	MRO	1, 3, 5, 6											
8.	Dave Rudolph	Basin Electric Power Cooperative	MRO	1, 3, 5, 6											
9.	Eric Ruskamp	Lincoln Electric System	MRO	1, 3, 5, 6											
10.	Joseph Knight	Great River Energy	MRO	1, 3, 5, 6											
11.	Joe DePoorter	Madison Gas & Electric	MRO	3, 4, 5, 6											
12.	Scott Nickels	Rochester Public Utilities	MRO	4											
13.	Terry Harbour	MidAmerican Energy Company	MRO	1, 3, 5, 6											
14.	Richard Burt	Minnkota Power Cooperative, Inc.	MRO	1, 3, 5, 6											

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Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
10.	Group	Sam Ciccone	FirstEnergy	X		X	X	X	X				
<b>Additional Member Additional Organization Region Segment Selection</b>													
1.	Dave Folk	FE	RFC	1, 3, 4, 5, 6									
2.	Doug Hohlbaugh	FE	RFC	1, 3, 4, 5, 6									
3.	Brian Orians	FE	RFC	5									
4.	John Reed	FE	RFC	1									
5.	Andy Hunter	FE	RFC	1									
6.	Bil Duge	FE	RFC	5									
11.	Group	Jason Marshall	Midwest ISO Standards Collaborators		X								
<b>Additional Member Additional Organization Region Segment Selection</b>													
1.	Robert Thomasson	Big Rivers Electric Cooperative	SERC	1, 3									
2.	Joe O'Brien	NIPSCO	RFC	1, 3, 5, 6									
3.	Bob Thomas	Illinois Municipal Electric Agency	RFC	4									
4.	Kirit Shah	Ameren	SERC	1									
5.	Joe Knight	Great River Energy	MRO	1, 3, 5, 6									
6.	Mike Moltane	ITC Holdings	MRO	1									
12.	Group	Robert Rhodes	SPP Standards Development	X	X	X	X	X					
<b>Additional Member Additional Organization Region Segment Selection</b>													
1.	Fred Meyer	Empire District Electric	SPP	1									
2.	Gregory McAuley	Oklahoma Gas & Electric	SPP	1, 3, 5									
3.	John Allen	City Utilities of Springfield, MO	SPP	1, 4									
4.	Kyle McMenamin	Xcel Energy	SPP	1, 3, 5									
5.	Michelle Corley	Cleco	SPP	1, 3, 5									
6.	Rick Brenneman	Xcel Energy	SPP	1, 3, 5									
7.	Sean Simpson	Board of Public Utilities of Kansas City, KS	SPP	1, 3, 5									
8.	Forrest Brock	Western Farmers Electric Cooperative	SPP	1, 3, 5									

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9.		Jim Usleldinger	Kansas City Power & Light	SPP	1, 3, 5									
13.	Group	Michael Gammon	Kansas City Power & Light		X		X		X	X				
		<b>Additional Member</b>	<b>Additional Organization</b>	<b>Region</b>	<b>Segment Selection</b>									
1.		Jennifer Flandermeyer	Kansas City Power & Light	SPP	1, 3, 5, 6									
14.	Individual	Jack Cashin	Competitive Suppliers						X					
15.	Individual	John Bee	Exelon		X		X		X	X				
16.	Individual	Sandra Shaffer	PacifiCorp		X		X		X	X				
17.	Individual	Janet Smith	Arizona Public Service Company		X		X		X	X				
18.	Individual	Brent Ingebrigtsen	LG&E and KU Energy				X							
19.	Individual	Cindy Martin	Southern Company		X		X							
20.	Individual	Greg Froehling	Green Country Energy, Green Country Operating Services						X					
21.	Individual	Steve Alexanderson	Central Lincoln				X	X						
22.	Individual	Mace Hunter	Lakeland Electric		X		X		X					
23.	Individual	Joe Petaski	Manitoba Hydro		X		X		X	X				
24.	Individual	Brian J Murphy	NextEra Energy, Inc.		X		X		X	X				
25.	Individual	Jonathan Appelbaum	United Illuminating Company		X									

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26.	Individual	Paul Kerr	Shell Energy North America (US), L.P.						X				
27.	Individual	Thad Ness	American Electric Power	X		X		X	X				
28.	Individual	David Thorne	Pepco Holdings Inc	X		X							
29.	Individual	Andrew Puztai	American Transmission Company	X									
30.	Individual	Kathleen Goodman	ISO New England		X								
31.	Individual	Steve Myers	ERCOT ISO		X								
32.	Individual	Steve Rueckert	WECC										X
33.	Individual	Bill Keagle	BGE	X									
34.	Individual	Brenda Powell	Constellation Energy Commodities Group						X				
35.	Individual	Greg Rowland	Duke Energy	X		X		X					
36.	Individual	CJ Ingersoll	CECD			X							
37.	Individual	Rex A Roehl	Indeck Energy Services					X					
38.	Individual	Shaun Anders	City of Springfield, IL - City Water Light and Power (CWLP)	X		X		X					
39.	Individual	RoLynda Shumpert	South Carolina Electric and Gas	X		X		X	X				
40.	Individual	Dan Rochester	Independent Electricity System Operator		X								

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41.	Individual	Alice Ireland	Xcel Energy	X		X		X	X				

**1. Do you agree with COM-001 requirements for Interpersonal Communications capability and Alternative Interpersonal Communications capability (R1-R8)? If not, please explain in the comment area below.**

**Summary Consideration:**

For the COM-001 standard, several commenters had suggestions for improvements to the requirement language and applicability. The RCSDT believes the standard correctly and adequately requires each applicable entity that would have capability to receive Interconnection and operating information to have Interpersonal Communications and Alternative Interpersonal Communications to be used when the Interpersonal Communication is not available. The RCSDT has addressed the applicability of the standards and implementation plans by aligning COM-001-2, and COM-002-3 to include the same entities and by removing LSE, PSE and TSP from the COM standards.

Many comments were concerned about both the medium (e.g. cellular, satellite, etc.) and media (e.g. voice, email, etc.) used for Interpersonal Communications. The current language avoids being prescriptive and allows each entity to determine what is suitable. Interpersonal Communication and Alternative Interpersonal Communication is between the applicable entities which may include multiple locations (e.g. a primary and back-up control center).

The RCSDT added the following Requirement Parts at the suggestion of stakeholders:

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4.3 Adjacent Transmission Operators synchronously connected within the same Interconnection

5.6 Adjacent Balancing Authorities

6.3 Adjacent Balancing Authorities

The RCSDT agrees with the many industry comments and removed the phrase "to exchange Interconnection and operating information" in requirements R1 through R8. This removal clarifies that the intent of this capability is NOT for the exchange of data.

A few commenters also expressed concerns about the frequency of testing Alternative Interpersonal Communications capability. The RCSDT believes that the proposed testing frequency is supported by the majority of stakeholders and is not overly burdensome.

Several commenters suggested that VSLs should be written based on the percent of entities rather than by an occurrence of a violation. VSLs must be written on a violation occurrence basis in accordance with FERC guidelines. The requirements specify which entities must be included in communications capabilities. If a single entity is missing, this is a violation of the requirement. According to VSL guidelines, if missing any part of the requirement could have the same reliability outcome as missing the entire requirement, the requirement is binary and the VSL must be severe.

A new requirement was added for clarity regarding responsibilities of the Distribution Provider and the Generator Operator when either entity experiences a failure of its Interpersonal Communication capability:

R11. Each Distribution Provider and Generator Operator that experiences a failure of any of its Interpersonal Communication capabilities shall consult with its Transmission Operator or Balancing Authority as applicable to determine a mutually agreeable time to restore the Interpersonal Communication capability. [*Violation Risk Factor: Medium*][*Time Horizon: Real-time Operations*]

This requirement requires collaboration between entities to restore a failed communications capability.

Organization	Yes or No	Question 1 Comment
ERCOT ISO	No	<p>We expressed in the last posting that we felt the definition of Interpersonal Communications might inadvertently include data. The SDT responded that it does not by referring to Interpersonal in the name of the definition. Clearly, you cannot refer to the word you are defining in order to define it. However, it is possible “allows two or more individuals to ...” may solve this problem. Clarity should be sought in the next posting, if possible. This standard does not comport with the informational filing that NERC submitted to FERC on August 10, 2009 regarding its discontinued use of sub-requirements in standards development activities. We request the sub-requirements be modified into bulleted lists. Consider striking “to exchange Interconnection and operating information” in R1, R3, R5, R7, and R8. It is redundant to the use of Interpersonal Communications “to interact, consult, or exchange information” in the definition. Consider striking “to exchange Interconnection and operating information” in R2, R4, R6. It is redundant to the use of Alternative Interpersonal Communications which uses Interpersonal Communications in its definition. Interpersonal Communications includes “to interact, consult, or exchange information” in its definition. For R2, why is Interchange Coordinator excluded? It is included in the Requirement R1 which deals with the Interpersonal Communications. Communications would need to be maintained with the Interchange Coordinator in the event of a failure of the Interpersonal Communications. For R3, affected neighboring Transmission Operators should be included. For R4 and R6, the sub-requirement list is different than for than for the associated Interpersonal Communications requirements R3 and R5 respectively. We believe these should be duplicate. That is the sub-requirement list for R4 should match R3 and the R6 should match R5. In the event of a failure of the Interpersonal Communications, the Transmission Operator and Balancing Authority both would need to maintain communications to the same entities as in the requirement to have Interpersonal Communications. Again, we would suggest replacing sub-requirements with bulleted lists. For R5, why are neighboring Balancing Authorities not included? Additionally R5 should only read Contact with Interchange Coordinator within same Interconnection. They certainly need to be able to contact one another to identify discrepancies in scheduling and sources of meter error that could lead to deviations in ACE. Should R2, R4 and R6 be constructed parallel to R1, R3, and R5? In R1, R3 and R5, the requirement is “shall have” while in R2, R4, and R6, the requirement is “shall designate”. Since one is for the Interpersonal Communications and the other is for the Alternative Interpersonal Communications, it seems the same wording should be used. We do not believe R2.2 and R1.2 should be limited to Reliability Coordinators in the same Interconnection only. We suggest modifying “within the same Interconnection” to “within the same Interconnection, and, as appropriate, between a-synchronously connected RCs which are not precluded by law from scheduling interchange energy (for schedule changes, curtailments, etc.)” since reliability coordination may be required among the RCs on both sides of an Interconnection boundary. The VSLs for R1 through R8 should be expanded to include multiple levels based on the number of entities that the functional entity does not have Interpersonal Communications or Alternative Interpersonal</p>

Organization	Yes or No	Question 1 Comment
		<p>Communications. FERC specified their general preference for gradated in paragraph 27 of their June 19, 2008 order on VSLs. The second half of the Severe VSL for R9 is almost a duplicate to the Lower VSL. There are some small changes in the wording but both situations deal with the case where there is a problem that has been identified with the Interpersonal Communications system and it takes more than two hours to initiate repair.</p>
ISO New England	No	<p>We expressed in the last posting that we felt the definition of Interpersonal Communications might inadvertently include data. The SDT responded that it does not by referring to Interpersonal in the name of the definition. Clearly, you cannot refer to the word you are defining in order to define it. However, it is possible “allows two or more individuals to ...” may solve this problem. Clarity should be sought in the next posting, if possible. This standard does not comport with the informational filing that NERC submitted to FERC on August 10, 2009 regarding its discontinued use of sub-requirements in standards development activities. We request the sub-requirements be modified into bulleted lists. Consider striking “to exchange Interconnection and operating information” in R1, R3, R5, R7, and R8. It is redundant to the use of Interpersonal Communications “to interact, consult, or exchange information” in the definition. Consider striking “to exchange Interconnection and operating information” in R2, R4, R6. It is redundant to the use of Alternative Interpersonal Communications which uses Interpersonal Communications in its definition. Interpersonal Communications includes “to interact, consult, or exchange information” in its definition. For R2, why is Interchange Coordinator excluded? It is included in the Requirement R1 which deals with the Interpersonal Communications. Communications would need to be maintained with the Interchange Coordinator in the event of a failure of the Interpersonal Communications. For R3, affected neighboring Transmission Operators should be included. For R4 and R6, the sub-requirement list is different than for than for the associated Interpersonal Communications requirements R3 and R5 respectively. We believe these should be duplicate. That is the sub-requirement list for R4 should match R3 and the R6 should match R5. In the event of a failure of the Interpersonal Communications, the Transmission Operator and Balancing Authority both would need to maintain communications to the same entities as in the requirement to have Interpersonal Communications. Again, we would suggest replacing sub-requirements with bulleted lists. For R5, why are neighboring Balancing Authorities not included? Additionally R5 should only read Contact with Interchange Coordinator within same Interconnection. They certainly need to be able to contact one another to identify discrepancies in scheduling and sources of meter error that could lead to deviations in ACE. Should R2, R4 and R6 be constructed parallel to R1, R3, and R5? In R1, R3 and R5, the requirement is “shall have” while in R2, R4, and R6, the requirement is “shall designate”. Since one is for the Interpersonal Communications and the other is for the Alternative Interpersonal Communications, it seems the same wording should be used. We do not believe R2.2 and R1.2 should be limited to Reliability Coordinators in the same Interconnection only. We suggest modifying “within the same Interconnection” to “within the same Interconnection, and, as appropriate, between a-synchronously connected RCs which are not precluded by law from scheduling interchange energy (for schedule changes, curtailments, etc.)” since reliability</p>



Organization	Yes or No	Question 1 Comment
		<p>coordination may be required among the RCs on both sides of an Interconnection boundary. The VSLs for R1 through R8 should be expanded to include multiple levels based on the number of entities that the functional entity does not have Interpersonal Communications or Alternative Interpersonal Communications. FERC specified their general preference for gradated in paragraph 27 of their June 19, 2008 order on VSLs. The second half of the Severe VSL for R9 is almost a duplicate to the Lower VSL. There are some small changes in the wording but both situations deal with the case where there is a problem that has been identified with the Interpersonal Communications system and it takes more than two hours to initiate repair.</p>
<p>IRC Standards Review Committee</p>	<p>No</p>	<p>We expressed in the last posting that we felt the definition of Interpersonal Communications might inadvertently include data. The SDT responded that it does not by referring to Interpersonal in the name of the definition. Clearly, you cannot refer to the word you are defining in order to define it. However, it is possible “allows two or more individuals to ...” may solve this problem. Clarity should be sought in the next posting, if possible. This standard does not comport with the informational filing that NERC submitted to FERC on August 10, 2009 regarding its discontinued use of sub-requirements in standards development activities. We request the sub-requirements be modified into bulleted lists. Consider striking “to exchange Interconnection and operating information” in R1, R3, R5, R7, and R8. It is redundant to the use of Interpersonal Communications “to interact, consult, or exchange information” in the definition. Consider striking “to exchange Interconnection and operating information” in R2, R4, R6. It is redundant to the use of Alternative Interpersonal Communications which uses Interpersonal Communications in its definition. Interpersonal Communications includes “to interact, consult, or exchange information” in its definition. For R2, why is Interchange Coordinator excluded? It is included in the Requirement R1 which deals with the Interpersonal Communications. Communications would need to be maintained with the Interchange Coordinator in the event of a failure of the Interpersonal Communications. For R3, affected neighboring Transmission Operators should be included. For R4 and R6, the sub-requirement list is different than for than for the associated Interpersonal Communications requirements R3 and R5 respectively. We believe these should be duplicate. That is the sub-requirement list for R4 should match R3 and the R6 should match R5. In the event of a failure of the Interpersonal Communications, the Transmission Operator and Balancing Authority both would need to maintain communications to the same entities as in the requirement to have Interpersonal Communications. Again, we would suggest replacing sub-requirements with bulleted lists. For R5, why are neighboring Balancing Authorities not included? Additionally R5 should only read Contact with Interchange Coordinator within same Interconnection. They certainly need to be able to contact one another to identify discrepancies in scheduling and sources of meter error that could lead to deviations in ACE. Should R2, R4 and R6 be constructed parallel to R1, R3, and R5? In R1, R3 and R5, the requirement is “shall have” while in R2, R4, and R6, the requirement is “shall designate”. Since one is for the Interpersonal Communications and the other is for the Alternative Interpersonal Communications, it seems the same wording should be used. We do not believe R2.2 and R1.2 should be limited to Reliability Coordinators in the same Interconnection only. We suggest modifying “within the same Interconnection” to “within the same</p>

Organization	Yes or No	Question 1 Comment
		<p>Interconnection, and, as appropriate, between a-synchronously connected RCs which are not precluded by law from scheduling interchange energy (for schedule changes, curtailments, etc.)” since reliability coordination may be required among the RCs on both sides of an Interconnection boundary. The VSLs for R1 through R8 should be expanded to include multiple levels based on the number of entities that the functional entity does not have Interpersonal Communications or Alternative Interpersonal Communications. FERC specified their general preference for gradated in paragraph 27 of their June 19, 2008 order on VSLs. The second half of the Severe VSL for R9 is almost a duplicate to the Lower VSL. There are some small changes in the wording but both situations deal with the case where there is a problem that has been identified with the Interpersonal Communications system and it takes more than two hours to initiate repair.</p>
Midwest ISO Standards Collaborators	No	<p>We expressed in the last posting that we felt the definition of Interpersonal Communications might inadvertently include data. The drafting team responded that it does not by referring to Interpersonal in the name of the definition. Clearly, you cannot refer the word you are defining to define it. However, it is possible “allows two or more individuals to ...” may solve this problem. What are the drafting team’s thoughts on this issue? This standard does not comport with the informational filing that NERC submitted to FERC on August 10, 2009 regarding its discontinued use of sub-requirements in standards development activities. Consider striking “to exchange Interconnection and operating information” in R1, R3, R5, R7, and R8. It is redundant to the use of Interpersonal Communications “to interact, consult, or exchange information” in the definition. Consider striking “to exchange Interconnection and operating information” in R2, R4, R6. It is redundant to the use of Alternative Interpersonal Communications which uses Interpersonal Communications in its definition. Interpersonal Communications includes “to interact, consult, or exchange information” in its definition. For R2, why is Interchange Coordinator excluded? It is included in the Requirement R1 which deals with the Interpersonal Communications. Communications would need to be maintained with the Interchange Coordinator in the event of a failure of the Interpersonal Communications. For R3, neighboring Transmission Operators should be included. For R4 and R6, the sub-requirement list is different than for than for the associated Interpersonal Communications requirements R3 and R5 respectively. They should be duplicate. That is the sub-requirement list for R4 should match R3 and the R6 should match R5. In the event of a failure of the Interpersonal Communications, the Transmission Operator and Balancing Authority both would need to maintain communications to the same entities as in the requirement to have Interpersonal Communications. For R5, why are neighboring Balancing Authorities not included? They certainly need to be able to contact one another to identify discrepancies in scheduling and sources of meter error that could lead to deviations in ACE. Should R2, R4 and R6 be constructed parallel to R1, R3, and R5? In R1, R3 and R5, the requirement is “shall have” while in R2, R4, and R6, the requirement is “shall designate”. Since one is for the Interpersonal Communications and the other is for the Alternative Interpersonal Communications, it seems the same wording should be used. Should R2.2 and R1.2 be limited to Reliability Coordinators in the same Interconnection only? The VSLs for R1 through R8 should be expanded to include multiple levels based on the number of entities that the functional entity does not have Interpersonal Communications or</p>

Organization	Yes or No	Question 1 Comment
		<p>Alternative Interpersonal Communications. FERC specified their general preference for gradated in paragraph 27 of their June 19, 2008 order on VSLs. The second half of the Severe VSL for R9 is almost duplicate to the Lower VSL. There are some small changes in the wording but both situations deal with the case where there is a problem that has been identified with the Interpersonal Communications system and it takes more than two hours to initiate repair.</p>
<p>Northeast Power Coordinating Council</p>	<p>No</p>	<p>It was expressed in the last posting that the definition of Interpersonal Communications might inadvertently include data. The SDT responded that it does not by referring to Interpersonal in the wording of the definition. The word being defined shouldn't be in the definition. However, incorporating "allows two or more individuals to ..." is an option that may solve this problem. The next posting should clarify this.</p> <p><b>Response:</b> The RCSDT has clarified in previous responses to comments that the requirements of COM-001 do not apply to data. The current proposed definition of Interpersonal Communications includes the phrase "allows two or more individuals to...". In an effort to make this more clear, the RCSDT has revised Requirements R1-R8 to remove the phrase "to exchange Interconnection and operating information" as you and others have suggested. This will provide the needed clarity for stakeholders that COM-001 does not include "data exchange."</p> <p>This standard does not comport with the informational filing that NERC submitted to FERC on August 10, 2009 regarding its discontinued use of sub-requirements in standards development activities. The sub-requirements should be modified into bulleted lists.</p> <p><b>Response:</b> The information filing did not propose to eliminate the use of numbered items altogether, but proposed changing the manner in which they were numbered. Bulleted lists are used to indicate sets of options; numbered lists are used when each of the listed items are required.</p> <p>Consider striking "to exchange Interconnection and operating information" in R1, R3, R5, R7, and R8. It is redundant to the use of Interpersonal Communications "to interact, consult, or exchange information" in the definition.</p> <p><b>Response:</b> The RCSDT agrees and we have removed the phrase "to exchange Interconnection and operating information" from R1-R8. This helps clarify the intent that the capability is NOT for data exchange as data is covered under the provisions of the recently approved IRO-010-1a.</p> <p>Consider striking "to exchange Interconnection and operating information" in R2, R4, R6. It is redundant to the use of Alternative Interpersonal Communications which uses Interpersonal Communications in its definition. Interpersonal Communications includes "to interact, consult, or exchange information" in its definition.</p> <p><b>Response:</b> The RCSDT agrees and we have removed the phrase "to exchange Interconnection and</p>

Organization	Yes or No	Question 1 Comment
		<p>operating information from R1-R8. This helps clarify the intent that the capability is NOT for data exchange as data is covered under the provisions of the recently approved IRO-010-1a.</p> <p>For R2, why is Interchange Coordinator excluded? It is included in the Requirement R1 which deals with the Interpersonal Communications. Communications would need to be maintained with the Interchange Coordinator in the event of a failure of the Interpersonal Communications.</p> <p><b>Response:</b> R1 is dealing with the “normal” communications. R2 deals with the default reliability needs. The normal communications include Interchange Coordinators because they are part of the administration of Interchange. The SDT predicated R2 on being in an unusual situation in which only the basic reliability functions were needed. In such times, the Interchange Function is seen as sacrificial because the BA itself could operate reliably (not necessarily efficiently) by simply dealing with it is adjacent BAs and “scheduling” interchange on a BA to BA basis (as opposed to a PSE to PSE basis). The Interchange Coordinator is only needed to ensure all of the commercial arrangements are validated by all parties. In stressed conditions those checkouts can be by-passed and dealt with after-the-fact. That <u>does not mean</u> that when an entity goes to backup is expected to bypass the Interchange Coordinator. The requirement R2 merely focused on the worst case situation.</p> <p>This requirement is not meant to define the alternate backup system; it is merely mandating the lowest mandatory requirements on the backup system. For example during the Y2K operations backup systems included satellite phones which did not cover all entities involved in normal operations. The SDT wrote the requirements to assure that such an event would not cause all RCs, BAs and TOPs to be non-compliant.</p> <p>For R3, affected neighboring Transmission Operators should be included.</p> <p><b>Response:</b> The SDT has included the following Part 3.5 of Requirement R3:</p> <p style="padding-left: 40px;">3.5 Adjacent Transmission Operators synchronously connected within the same Interconnection</p> <p>For R4 and R6, the sub-requirement list is different from the associated Interpersonal Communications requirements R3 and R5 respectively. These should be duplicate. The sub-requirement list for R4 should match R3, and the sub-requirement list for R6 should match R5. In the event of a failure of the Interpersonal Communications, the Transmission Operator and Balancing Authority both would need to maintain communications to the same entities as in the requirement to have Interpersonal Communications.</p> <p><b>Response:</b> The SDT has included the following Part 4.3 of Requirement R4:</p> <p style="padding-left: 40px;">4.3 Adjacent Transmission Operators synchronously connected within the same Interconnection</p> <p>The SDT has included the following Part 6.3 of Requirement R6:</p> <p style="padding-left: 40px;">6.3 Adjacent Balancing Authorities</p>

Organization	Yes or No	Question 1 Comment
		<p>The RCSDT asserts the standard meets FERC Order 693 regarding DP and GOP entities by requiring these entities to have Interpersonal Communication capability. Not requiring DP and GOP entities to have Alternative Interpersonal Communication capability meets FERC’s intention as stated here: “We (FERC) clarify that the NOPR did not propose to require redundancy on generator operators’ or distribution providers’ telecommunication facilities...” (Order 693, RM06-16-000, Paragraph 487).</p> <p>The sub-requirements should be bulleted lists.</p> <p><b>Response:</b> Bulleted lists are used to indicate sets of options; numbered lists are used when each of the listed items are required.</p> <p>For R5, why are neighboring Balancing Authorities not included?</p> <p><b>Response:</b> The SDT has included the following Part 5.6 of Requirement R5:</p> <p style="padding-left: 40px;">5.6 Adjacent Balancing Authorities</p> <p>Note that this is a defined term in the glossary: “A Balancing Authority Area that is interconnected (to) another Balancing Authority Area either directly or via a multi-party agreement or transmission tariff.”</p> <p>Additionally, R5 should only read Contact with Interchange Coordinator within the same Interconnection. They need to be able to contact one another to identify discrepancies in scheduling and sources of meter error that could lead to deviations in ACE.</p> <p><b>Response:</b> The RCSDT has removed the Interchange Coordinator from the standard (R1 and R5) as the BA is responsible for the reliability implications of Interchange. The reliability relationship lies between BA’s.</p> <p>Should R2, R4 and R6 be constructed parallel to R1, R3, and R5? In R1, R3 and R5, the requirement is “shall have” while in R2, R4, and R6, the requirement is “shall designate”. Since one is for the Interpersonal Communications and the other is for the Alternative Interpersonal Communications, the same wording should be used.</p> <p><b>Response:</b> The SDT inserted the different terminology because there may be more than one type backup system, Some entities have land lines; cell phones; satellite phones; voice over internet; and/or teleconferencing. The language is intended to provide flexibility to allow entities to have one or more types of backup while designating one for Alternative Interpersonal Communications.</p> <p>R2.2 and R1.2 should not be limited to Reliability Coordinators in the same Interconnection only. Modify “within the same Interconnection” to “within the same Interconnection, and, as appropriate, between a-synchronously connected RCs which are not precluded by law from scheduling interchange energy (for schedule changes, curtailments, etc.)” since reliability coordination may be required among the RCs on both sides of an Interconnection boundary.</p>

Organization	Yes or No	Question 1 Comment
		<p><b>Response:</b> The requirement proposed by NPCC is predicated on “as appropriate.” Such subjective phrases cannot be used in a standard. The issue of asynchronous entities is not germane to the requirement but the requirement does not preclude additional coordination to meet the specifics of ERCOT, HQ and WECC. A regional variance may be an option for you to consider.</p> <p>The VSLs for R1 through R8 should be expanded to include multiple levels based on the number of entities that the functional entity does not have Interpersonal Communications or Alternative Interpersonal Communications with. FERC specified their general preference for gradated in paragraph 27 of their June 19, 2008 order on VSLs.</p> <p><b>Response:</b> Each entity listed in Requirements R1-R8 is required to meet the contents with respect to each other entity listed in the requirement. Failure to have the capability with a single entity is a single violation of the requirement. For example, if an RC has 5 BA’s within it Area and fails to have Interpersonal Communications with two of them, then the RC has violated the requirement twice. The VSLs are written to address each violation of the Requirement. We have removed the words “or more” from the VSLs.</p> <p>The second half of the Severe VSL for R9 is almost a duplicate of the Lower VSL. There are some small changes in the wording but both situations deal with the case where there is a problem that has been identified with the Interpersonal Communications system and it takes more than two hours to initiate repair.</p> <p><b>Response:</b> The R9 Severe VSL was revised to remove “within 2 hours”. It now reads:</p> <p style="padding-left: 40px;">“The responsible entity tested the Alternative Interpersonal Communications capability and identified a problem but didn’t initiate action to repair or designate a replacement Alternative Interpersonal Communications.”</p>
<p><b>Response:</b> The RCSdT thanks you for your comment. Please see responses embedded above.</p>		
PNGC Power member owners	No	<p>Thank you for the opportunity to comment and for your hard work on this project: While we agree that effective Interpersonal Communications capability are integral to reliability, many Distribution Providers (DP) are small entities that do not maintain a 24-7 dispatch desk capable of receiving or responding to emergency reliability directives in a timely manner. It is our belief that some of the proposals in this project could unnecessarily force small entities to make investments that will not enhance reliability. Many DPs rely on answering services to address customer-service issues during non-business hours. On-call personnel are contacted in the event of an outage or emergency and crews are dispatched as appropriate. It is difficult to envision a BA or TOP issuing an Emergency Reliability Directive to a small entity (25 MW or so) which would require these smaller entities to comply with COM-001. Order 693 directs the inclusions of DPs in the COM-001-2 standard but it is our belief that the Commission offered language that GOs and DPs need not have redundant communications, training unrelated to normal/emergency operations, and that telecommunications</p>

Organization	Yes or No	Question 1 Comment
		<p>requirements for entities will vary according to their function. We believe those intentions should be reflected in the language of this standard. We would suggest adding wording such as in the applicability section, "Distribution Providers who maintain a 24-7 control centers with the ability to manually shed load of at least 100 MW within a 15-minute operational window."Also, a note that smaller, rural entities can be dependent on a phone system provider that will not allow for backup communications. Should the communication line(s) be dependent on one main phone trunk line, the failure due to an issue on this main line will make it impossible to notify anyone of its failure short of physically traveling to an area where phone service is available. For some rural areas, this will exceed the one hour time limit to report the communication outage. Forcing smaller entities to acquire satellite phone service to mitigate for a phone outage is a high price to pay when no reliability improvement will be achieved. Suggested change could be: "... shall notify impacted entities within 60 minutes of the detection of a failure of its Interpersonal Communications capabilities that lasts 30 minutes or longer where alternate forms of communication are available within a 15 minute access time. Should alternate forms of communication not be available within the 15 minute access time, then upon reestablishment of Communication capabilities impacted entities will be notified of the past loss and current status of Communication."We've heard many representatives from FERC and NERC indicate that the standards development process has led the industry to take action in many cases for the sake of compliance while not necessarily enhancing reliability. As has been stated many times, the process should be about improving reliability, not about complying with standards. Unnecessarily including smaller entities that will NEVER receive an emergency reliability directive might be an example of the former.</p>
<p><b>Response:</b> The RCSDT thanks you for your comment. There is no requirement for 24/7 support, the requirement is to have communications capability. The type of system (i.e. On-Call) is not prescribed in the standard and the standard is designed not to impose needless communications requirements. The purpose of COM-002 is "To ensure emergency communications between operating personnel are <u>effective</u>." It is not a proxy requirement to establish 24/7 operating personnel at small distribution providers. The intent is to establish a <u>method</u> of communicating Reliability Directives during Emergencies. While it is true that many small Distribution Providers are not staffed 24x7, it is typical that they have a means of communication, in many cases this may be via a receptionist, or answering service. It is the expectation that an issuer of a Reliability Directive would request a return call by the Distribution Provider operating personnel, then issue the Reliability Directive. If this return call would not be timely enough, then the issuer would determine a different mitigation plan.</p>		
PPL	Yes	
PSEG	No	Com-001-2 implementation plan lists that this is applicable to PSE's and LSE's however, PSE's and LSE's were removed from the actual standard. The implementation plan should be revised.
<p><b>Response:</b> The RCSDT thanks you for your comment. We have revised as you suggested.</p>		
Dominion	No	The monthly testing requirement for Alternative Interpersonal Communications is overly burdensome without any evidence to support that it is necessary to insure reliability. We believe that an entity will take necessary

Organization	Yes or No	Question 1 Comment
		<p>steps to insure the Alternative Interpersonal Communications is functioning properly, especially if it experiences problems with its Interpersonal Communications, it. We can support quarterly testing as we believe it strikes a reasonable balance.</p>
<p><b>Response:</b> The RCSDT thanks you for your comment. The drafting team has not received a large number of comments that suggest that the frequency of the testing is burdensome and believes that the testing could occur in the normal course of daily activities. Therefore, the SDT believes the frequency of testing will not be burdensome.</p>		
<p>South Carolina Electric and Gas</p>	<p>No</p>	<p>Each sub-requirement should not have an “R” in front of the number in order to be consistent with NERC’s August 10, 2009 filing at FERC on this subject. Requirement R3 and R4 should include adjacent TOPs as a sub-requirement. Requirements R5 and R6 should include adjacent BAs as a sub-requirement. ”to exchange Interconnection and operating information” should be deleted from requirements R1 through R8 as it is redundant with the definition of Interpersonal Communications. The last page of the Implementation Plan includes LSEs, PSE, and TSPs as being responsible entities under this standard, yet the standard does not include them. Please correct the implementation plan.</p>
<p>SERC OC Standards Review Group</p>	<p>No</p>	<p>Each sub-requirement should not have an “R” in front of the number in order to be consistent with NERC’s August 10, 2009 filing at FERC on this subject.</p> <p><b>Response:</b> The RCSDT agrees and this change has been made.</p> <p>Requirement R3 and R4 should include adjacent TOPs as a sub-requirement.</p> <p><b>Response:</b> The SDT has included the following Part 3.5 of Requirement R3 and 4.3 of R4:                      Adjacent Transmission Operators synchronously connected within the same Interconnection</p> <p>Requirements R5 and R6 should include adjacent BAs as a sub-requirement.</p> <p><b>Response:</b> The SDT has included the following Part 5.6 of Requirement R5 and Part 6.3 of R6:                      Adjacent Balancing Authorities</p> <p>Note that this is a defined term in the glossary: “A Balancing Authority Area that is interconnected to another Balancing Authority Area either directly or via a multi-party agreement or transmission tariff.”</p> <p>”to exchange Interconnection and operating information” should be deleted from requirements R1 through R8 as it is redundant with the definition of Interpersonal Communications.</p> <p><b>Response:</b> The RCSDT agrees and we have removed the phrase “to exchange Interconnection and operating information from R1-R8.</p>



Organization	Yes or No	Question 1 Comment
		<p>The last page of the Implementation Plan includes LSEs, PSE, and TSPs as being responsible entities under this standard, yet the standard does not include them. Please correct the implementation plan.</p> <p><b>Response:</b> The RCSDT agrees and we have made the revision.</p>
<p><b>Response:</b> The RCSDT thanks you for your comment. Please see responses above.</p>		
<p>MRO's NERC Standards Review Subcommittee</p>	<p>No</p>	<p>A. R5.5 states a BA shall have Interpersonal Communications with each Interchange Coordinator within its BA area and adjacent Interchange Coordinators. NERC Registry Criteria (v5) uses the term “Interchange Authority” not Interchange Coordinator, please clarify.</p> <p><b>Response:</b> The RCSDT has removed the Interchange Coordinator from the standard based on stakeholder feedback.</p> <p>B. Upon review of the NERC Compliance Registry, there are only 56 BA’s that are also registered as an IA but 138 total BA’s within the registry. R5.5 is not clearly written because many BA’s do not have an IA within their BA area. Though a BA will use an IA to schedule interchange, a possible rewrite of R5.5 may be “Each Interchange Authority that the BA actively uses to arrange Interchange”.</p> <p><b>Response:</b> The RCSDT has removed the Interchange Coordinator from the standard based on stakeholder feedback.</p> <p>C. R10 states that the RC, TOP, BA, DP and GOP shall notify “impacted entities” within 60 minutes... Please clarify if the SDT means the entities within the applicability section or is this to be determined by the entity. A possible rewrite may be; “Each RC shall notify TOP’s, BA’s, and IA’s within its RC area along with adjacent RC’s within the same Interconnection”. This break down would need to be required for each affected entity and would provide clarity to the industry.</p> <p><b>Response:</b> R10 specifies only “impacted entities”. That phrase is used to limit the scope of the requirement. If an entity has a failure of its Interpersonal Communications capability with only one entity, then <i>that</i> entity is the “impacted entity” and they should be notified of the failure.</p> <p>D. We do not agree with a DP and GOP need to be held to the same level of compliance as a RC, BA or TOP. FERC Order 693 (paragraph 487) directed the DP and GOP to be included in this standard by stating:” We expect the telecommunication requirements for all applicable entities will vary according to their roles and that these requirements will be developed under the Reliability Standards development process”. A DP and GOP may not be staffed 24 hours a day like a BA or TOP and the SDT did not take this into consideration.</p> <p><b>Response:</b> There is no requirement that requires identical communications systems. The requirement is to have “a” communication capability. The RCSDT asserts the standard meets FERC Order 693 regarding DP and GOP entities by requiring these entities to have Interpersonal Communication capability. Not requiring DP</p>

Organization	Yes or No	Question 1 Comment
		<p>and GOP entities to have Alternative Interpersonal Communication capability meets FERC's intention as stated here: "We (FERC) clarify that the NOPR did not propose to require redundancy on generator operators' or distribution providers' telecommunication facilities..." (Order 693, RM06-16-000, Paragraph 487). A new requirement was also added concerning the failure of a DP or GOP Interpersonal Communications capability:</p> <p style="padding-left: 40px;">R11 Each Distribution Provider and Generator Operator that experiences a failure of any of its Interpersonal Communication capabilities shall consult with its Transmission Operator or Balancing Authority as applicable to determine a mutually agreeable time to restore the Interpersonal Communication capability. <i>[Violation Risk Factor: Medium][Time Horizon: Real-time Operations]</i></p> <p>E. We understand that the DP and GOP need a means of communicating with their BA and TOP (R7 and R8) but would this not be the same Interpersonal Communications capability that as stated in R3 and R5 for the TOP and BA? Example: If the BA uses a phone line as their Interpersonal Communication medium to contact the DP wouldn't the DP also use the same medium to communicate with their BA? Yes, there could be different mediums but 99% of the time it will be the same medium.</p> <p><b>Response:</b> The RCSDT agrees with your assumption; however a reciprocal requirement is necessary. Without R7 and R8, there would be no requirement for the DP or GOP.</p> <p>F. R10 could mean that if there is a logging system that detects an Interpersonal Communication failure, then all applicable entities will need to monitor that monitoring device. Since this requirement applies to all applicable entities, and Interpersonal Communication mediums will most likely be the same, there will always be two entities found non compliant if the 60 minute threshold is passed.</p> <p><b>Response:</b> There is no requirement to monitor or log Interpersonal Communications capability, only to test. R10 requires the entity to notify the impacted entities upon a failed test or the detection of a failure.</p>
<p><b>Response:</b> The RCSDT thanks you for your comment. Please see responses above.</p>		
FirstEnergy	No	<p>It is not clear from the definition of Interpersonal Communications if certain communications "mediums" such as email, instant messaging, etc. are included.</p> <p><b>Response:</b> The requirements are for communications between two or more persons. Mediums are not listed to avoid being prescriptive in the requirement. The measures provide examples of mediums.</p> <p>Furthermore, the Measures for these requirements all include "electronic communications" as acceptable evidence. If the drafting team does not intend these mediums be included, then it should be clarified in the</p>

Organization	Yes or No	Question 1 Comment
		<p>definition. We suggest the following wording of the definition: Interpersonal Communication: Any medium that allows two or more individuals to interact, consult, or exchange information. This interaction consists of verbal, spoken words exchanged in Real-time.</p> <p><b>Response:</b> The use of verbal communication only is not the intent of the requirement. Written communication is also an acceptable form of Interpersonal Communication.</p>
<p><b>Response:</b> The RCSDT thanks you for your comment. Please see responses above.</p>		
SPP Standards Development	No	<p>We would suggest that the applicability of COM-001-2 be expanded to that listed in COM-002-3. How can the directives to be issued in COM-002 be delivered and confirmed without having Interpersonal Communications capability?</p> <p><b>Response:</b> The RCSDT has revised the applicability of COM-001 and COM-002 such that they contain the same functional entities. These are: RC, TOP, BA, GOP, and DP.</p> <p>All of the functional entities listed in R1.1 should also be listed in R2.1. Similarly the sub-requirements of R3 should also be applied to R4. The same holds true for R5 and R6.</p> <p><b>Response:</b> The requirements for Alternative Interpersonal Communications are different than for Interpersonal Communications. There is not necessarily a reliability need to have redundant capability with each and every entity such as DP and GOP.</p> <p>If the SDT intends to exclude data communications from Interpersonal Communications and Alternative Interpersonal Communications, we suggest the SDT be more specific in the definition to specifically exclude data communications in the definition. It is not readily apparent that these terms do not apply to data communications and without a clarification, confusion exists.</p> <p>Consider</p> <p><b>Response:</b> The RCSDT agrees and have removed the phrase “to exchange Interconnection and operating information from R1-R8. This helps clarify the intent that the capability is NOT for data exchange, as data is covered under the provisions of the recently approved IRO-010-1a.</p>
<p><b>Response:</b> The RCSDT thanks you for your comment. Please see responses above.</p>		
Kansas City Power & Light	No	<p>These requirements require TOP’s, BA’s, and GOP’s to establish alternative means of “interpersonal” communications with other BA’s, GOP’s, and BA’s respectively without regard to the reliability impact each TOP, BA or GOP has on the interconnection. Why would it be necessary for a TOP with one 161kv transmission line or a BA with 100 MW of total load, or one GOP with a 30MW unit to realize additional costs</p>

Organization	Yes or No	Question 1 Comment
		<p>when the facilities they operate have little reliability impact?</p> <p><b>Response:</b> The RCSDT believes that any NERC Registered Entity capable of issuing or receiving a directive is an applicable party to COM-001.</p> <p>In addition, most RC's have established satellite telephone systems as back-up communication with TOP's. RC's may have to establish additional communication systems with BA's as these requirements impose to avoid Standards of Conduct issues.</p> <p><b>Response:</b> It is unclear how this scenario would present Standards of Conduct issues for communication between reliability entities. The requirements pertain to reliability functions, not commercial functions or the way in which entities are structured internally.</p> <p>R9 - considering the reliability of communication systems, a 2 hour response to a problem with the alternative means of communication is over sensitive. Allowing for sometime in an operating shift would be more in line, such as 8 hours.</p> <p><b>Response:</b> The requirement is to initiate action within 2 hours, not complete it. The two hour time reference aligns with the timing shown in EOP-008 for back-up facilities.</p>
<p><b>Response:</b> The RCSDT thanks you for your comment. Please see responses above.</p>		
Competitive Suppliers		
Exelon	No	<p>1. COM-001-2, 4.4 - Distribution Providers and 4.5, Generation Operators should be highlighted and communicated as a substantive change since entities may not be aware that they are being added to the applicability section of the standard.</p> <p><b>Response:</b> These revisions were done based on FERC Order 693 directives. They have been widely distributed in redline form. NERC will ensure that the change in applicability is highlighted in the announcement of the next posting.</p> <p>2. COM-001-2, R10 - should have the following underlined clarifying text added, shall notify impacted entities within 60 minutes of the detection of a failure “of all primary and alternative “ Interpersonal Communications capabilities that lasts 30 minutes or longer. Exelon believes that the intent of R10 is for complete loss of communication ability and should not be applied to facilities that have multiple backups.</p> <p><b>Response:</b> The RCSDT developed R10 based on R3 of COM-001-1. The intent is to ensure that entities know not to use the primary and to use the alternative.</p> <p>3. COM-001-2, M1 thru 9 - Suggest that network diagrams and / or communications schematics be added as</p>

Organization	Yes or No	Question 1 Comment
		<p>suggested evidence.</p> <p><b>Response:</b> The measure only provides examples of the types of evidence that may be used for compliance and the list is not all inclusive. The term "...evidence that could include, but is not limited to..." addresses your suggestion.</p> <p>4. COM-001-2, VSL for R9 - Regarding failure to test the Alternative Interpersonal Communication, the Severity Level does not align with the potential impact to the BES. The Severity Level for simply missing a test should be revised to a High VSL.</p> <p><b>Response:</b> The VSL does not relate to risk to the BES (this is covered in the Violation Risk Factor). The VSL only indicates how badly an entity missed the mark with respect to the requirement. A Severe VSL is appropriate.</p>
<p><b>Response:</b> The RCSDT thanks you for your comment. Please see responses above.</p>		
PacifiCorp	Yes	
Arizona Public Service Company	Yes	
Southern Company	No	<p>Comments: Standard COM-001-2R10. Each Reliability Coordinator, Transmission Operator, Balancing Authority, Distribution Provider, and Generator Operator shall notify impacted entities within 60 minutes of the detection of a failure of its Interpersonal Communications capabilities that lasts 30 minutes or longer. Comment: It is not clear whether the notification requirements identified in R10 apply to failure of ALL available Interpersonal Communications or ANY Interpersonal Communications. We suggest that the existence of functioning Alternative Interpersonal Communications precludes the requirement for notification of impacted entities.</p> <p><b>Response:</b> The intent of R10 is to ensure that entities know not to use the primary and to use the alternative. Notification is required for the failure of the primary capability.</p> <p>D. Compliance 1. Compliance Monitoring Process 1.3 Data Retention Each Generator Operator shall keep the most recent twelve months of historical data (evidence) for Requirements R8 and R10, Measures M8 and M10. Comment: The data retention requirements specified for the Generator Operator in Para. 1.3 (above) are not consistent with the 3-year audit interval for the GOP. Question: When audited on this Standard is the expectation that the GOP will have 12 months of evidence or 36 months of evidence?</p> <p><b>Response:</b> The Data Retention section of the standard conforms to the NERC guidelines. The RCSDT has also added the following to the data retention section:</p>

Organization	Yes or No	Question 1 Comment
		<p>The following evidence retention periods identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit.</p> <p>Standard COM-002-3R2. Each Balancing Authority, Transmission Operator, Generator Operator, Transmission Service Provider, Load-Serving Entity, Distribution Provider, and Purchasing-Selling Entity that is the recipient of a Reliability Directive issued per Requirement R1, shall repeat, restate, rephrase or recapitulate the Reliability Directive with enough details that the accuracy of the message has been confirmed. Comment: The term “Reliability Directive” is currently not defined in the NERC Glossary of Terms. However, in the Implementation Plan for COM-002-3 the RC SDT proposes a definition for Reliability Directive. It is implied in the standard that the Reliability Directive is issued as a voice command which precludes the use of our preferred method of Interpersonal Communication. However, this is not definitively stated in either the standard or the proposed definition. I think this needs to be made clearer if the Reliability Directive must be issued as a voice command.</p> <p><b>Response:</b> The RCSDT disagrees with your assumption that the requirement implies that a Reliability Directive must be issued verbally. In a previous version of the draft standard, the RCSDT had included “verbal” issuance of directives. This was removed to allow the use of other than voice capability to issue a Reliability Directive.</p>
<p><b>Response:</b> The RCSDT thanks you for your comment. Please see responses above.</p>		
Green Country Energy, Green Country Operating Services	No	<p>COM-001 General question/comment. The reference to infrastructure should be removed and just keep the word “medium”. Here's why: What communication medium (infrastructure) does not use satellite at some point unless entities are within a close geographical proximity? How likely is it to have 2 different mediums? o Local phone and fax hard-wire likely. o Long distance phone and fax - satellite o Cell phone - satellite o Internet - satellite o Radio - antenna The reason for mentioning this is, if all we have is satellite then the reference to infrastructure should be removed and just keep the word “medium”.</p>
<p><b>Response:</b> The RCSDT thanks you for your comment. The RCSDT believes that the language of the definition is clearer with the existing verbiage.</p>		
Central Lincoln	No	See Q 6 below.
<p><b>Response:</b> The RCSDT thanks you for your comment. Please see responses to Q6.</p>		

Organization	Yes or No	Question 1 Comment
Lakeland Electric	Yes	
Manitoba Hydro	Yes	
NextEra Energy, Inc.	No	<p>As drafted, COM-001 is not clear or complete. At this stage in the evolution of compliance with the mandatory Reliability Standards, it is important that any new or revised Reliability Standard clearly articulate all compliance obligations and tasks consistent with Sections 302 (6) and (8) of the NERC Rules of Procedure. Thus, NextEra Energy Inc. (NextEra) has numerous recommended corrections to provide clarity and completeness to COM-001. For example, the requirement to designate an Alternative Interpersonal Communication capability is not clear. Does the designator solely designate for the designator’s knowledge or does the designator need to inform the entity on the other end of the connection. In R2, for instance, the Reliability Coordinator must designate, but it is also not clear whether the Reliability Coordinator must inform the Balancing Authorities or Transmission Operators. It is further unclear whether the designation must be documented, or if any informing of the Balancing Authorities or Transmission Operators must be documented. Thus, it is recommended that the drafters decide what was intended regarding the designation and clearly state the requirements.</p> <p><b>Response:</b> The Requirement R2 is for the RC to designate an Alternative Interpersonal Communication and inform the other entity (BA, TOP, etc.) as to what that Alternative Interpersonal Communication is. The Measure M2 provides examples of the types of evidence which may be used to prove compliance with the requirement.</p> <p>In R9 it states that “. . . on at least a monthly basis.” There are two issues to consider here. If the sentence stays, grammatically it should read “. . . on, at least, a monthly basis. . . However, from a compliance and technical perspective, the term “at least” has no significance and should be deleted. The requirement is to test on a monthly basis - the phrase “at least” only introduces ambiguity and implies that the party should consider every two or three weeks. If the drafting team believes a best practice is less than a month, there are other NERC educational tools to explain a best practice.</p> <p><b>Response:</b> The RCSDT used this term to allow more frequent testing to be performed.</p> <p>In R10, it states “. . . shall notify the impacted entity . . .” It would be clearer to state: “. . . shall notify the impacted Reliability Coordinator, Transmission Operator, Balancing Authority, Distribution Provider or Generator Operator . . .”</p> <p><b>Response:</b> The RCSDT believes your suggestion adds unnecessary verbiage to the requirement and does not provide additional clarity.</p>

Organization	Yes or No	Question 1 Comment
<p><b>Response:</b> The RCSDT thanks you for your comment. Please see responses above.</p>		
<p>United Illuminating Company</p>	<p>No</p>	<p>COM-001-2 does not specify the amount of time a DP has to reestablish the Interpersonal Communication Capability after the capability fails before it is assessed non-compliance for not having the communication. Is an entity non-compliant the minute the communication capability is unavailable? If so, then to be compliant a tertiary (or secondary capability for DP) must be installed by the entity. Something similar was discussed with EOP-008 R3: "To avoid requiring a tertiary facility, a backup facility is not required during: o Planned outages of the primary or backup facilities of two weeks or less o Unplanned outages of the primary or backup facilities". UI suggests the drafting team incorporate something similar.</p> <p><b>Response:</b> The RCSDT is proposing a new requirement to address your concerns for the DP. We have included the GOP as well:</p> <p style="padding-left: 40px;">R11. Each Distribution Provider and Generator Operator that experiences a failure of any of its Interpersonal Communication capabilities shall consult with their Transmission Operator or Balancing Authority as applicable to determine a mutually agreeable time to restore the Interpersonal Communication capability. <i>[Violation Risk Factor: Medium][Time Horizon: Real-time Operations]</i></p> <p>The VSL for R7 is severe only and states: "The Distribution Provider failed to have Interpersonal Communications capability with one or more of the entities listed in Parts 7.1 or 7.2." I believe there should be a time component to the VSL and the VSL staged. For example, failure to have communication established for less than 60 minutes would be Lower, anything over 1 hour severe. Also needed is a phrase to state when the violation begins. Does the violation begin when the loss of Communication Capability is detected or when it occurred? In other words, does the violation start when the operator attempts to use the phone and it is not functional, or did it occur when the phone line functionality failed but was not yet detected because no attempt to use the phone was made. So the VSL for R7 would follow a format of: "The Distribution Provider failed to have Interpersonal Communication Capability with one or more entities listed in Parts 7.1 or 7.2 for a continual 60 minutes period as measured from the time the ICC failure was detected". An alternative remedy is to alter the language of R7 to allow for unplanned outage.</p> <p><b>Response:</b> The VSL represents a single violation of the requirement. For this requirement, the DP must have Interpersonal Communication with its TOP and BA. The VSL was revised to remove "or more" to conform to the requirement.</p> <p>NERC does not have a Reliability Requirement for a DP to staff a control room 24/7. COM-0001 can be interpreted to imply that a DP needs to be staffed 24/7 to facilitate interpersonal communications. If NERC wants to extend the requirement for a 24/7 staffed operating position at the DP then the appropriate method is</p>



Organization	Yes or No	Question 1 Comment
		<p>thru a SAR to PER-002.</p> <p><b>Response:</b> COM-001 is not intended to imply a 24/7 requirement.</p> <p>COM-001 R7 should have a sub-requirement added recognizing that DP's are not required to staff 24/7 and many do not staff overnight. UI suggests adding R7.3: DP's will notify their TOP and/or BA when it is not staffing an operating desk.</p> <p><b>Response:</b> While the SDT does not disagree this would be good practice, other methods of addressing this situation (e.g., having an answering service, an on –call staff, or something similar) would be valid as well. The SDT does not believe it would be appropriate to limit this to only one method.</p> <p>R7: Should address the instance if the DP is not required to have communication with the BA, because the BA communicates thru the TOP.</p> <p><b>Response:</b> The intent of the standard is that the DP will have communication with their BA. Ti is not prescriptive as to how that communication will be implemented.</p>
<p><b>Response:</b> The RCSDT thanks you for your comment. Please see responses above.</p>		
American Electric Power	No	<p>The applicability of COM-001 and COM-002 appear to be at odds with each other. The requirements may need to be re-written so that they are in sync.</p>
<p><b>Response:</b> The RCSDT thanks you for your comment. The RCSDT has made revisions to COM-001 and COM-002 such that the applicability is compatible.</p>		
Pepco Holdings Inc	Yes	
American Transmission Company	Yes	<p>ATC agrees with the understanding that the line of demarcation is up to the point where ATC owns the equipment.</p>
<p><b>Response:</b> The RCSDT thanks you for your comment.</p>		
WECC	Yes	
BGE	Yes	<p>BGE has no additional comments.</p>
Constellation Energy Commodities Group	Yes	

Organization	Yes or No	Question 1 Comment
Duke Energy	No	<p>o We question how far the definition of Alternative Interpersonal Communication goes in requiring separate infrastructure from Interpersonal Communication. For example, wireless communications sometime utilize fiber optic networks.</p> <p><b>Response:</b> The definition requires the use of different infrastructure (medium) than the Interpersonal Communication used for day to day ops. The RCSDT cannot be prescriptive regarding the specific medium to be employed. This is intended to apply to assets and access to media that is within the control of the entity responsible for complying with the Requirement. For example, the way cell phone signals are routed is not within your control.</p> <p>o We question why the requirements state that entities must “have” Interpersonal Communications capability, but must “designate” Alternative Interpersonal Communications capability?</p> <p><b>Response:</b> Many entities have multiple Alternative Interpersonal Communication capabilities. Allowing them to designate which one they want to employ allows for flexibility in which one they use for AIC.</p> <p>o R1.2 and R2.2 - Why is this limited to the same interconnection?</p> <p><b>Response:</b> The phrase “within the same interconnection” is added for the case of ERCOT, which has only DC tie lines with the Eastern Interconnection and has minimal interchange.</p> <p>o R3 - need to add neighboring TOPs.</p> <p><b>Response:</b> Agreed.</p> <p>o R5 - need to add adjacent BAs.</p> <p><b>Response:</b> Agreed.</p> <p>o Interchange Coordinator - Add IC to the Applicability Section, and add a requirement that the IC have Interpersonal Communication capability with its BA and adjacent BAs.</p> <p><b>Response:</b> The RCSDT has eliminated the Interchange Coordinator from COM-001-2 based on other stakeholder comments..</p> <p>o Requirements to “designate” Alternative Interpersonal Communication should carry a “Medium” VRF instead of “High”, because they are a backup capability. The word “designate” carries the connotation that these are documentation requirements.</p> <p><b>Response:</b> The requirement to designate is for the entity to have an Alternative Interpersonal Communications capability and to designate what that is. In many cases, an entity will have multiple</p>

Organization	Yes or No	Question 1 Comment
		<p>alternatives and neighboring entities need to know how to contact them in case of a failure of the primary. If an entity does not designate its AIC, in an emergency it may not be able to issue or comply with directions or instructions which could directly contribute to BES instability, separation, or cascading failure.” The VRF should remain as high.</p> <p>o R9 requires a monthly test of Alternative Interpersonal Communications capability. This was quarterly in the last draft. We question how these requirements for “Alternative Interpersonal Communications” capability are related to requirements for “backup functionality” in EOP-008-1, which requires an annual test of backup functionality. Clarity on the relationship between “Interpersonal Communications”, “Alternative Interpersonal Communications”, “primary control center functionality” and “backup control center functionality” would be appreciated.</p> <p><b>Response:</b> Interpersonal Communication and Alternative Interpersonal Communication should be in both the primary and back up control center. IC and AIC are between entities as well. These capabilities are in the primary and back up control centers. The requirement applies to the primary control center. EOP-008 applies to the back up control center. An entity may test its AIC in the normal course of daily activities.</p> <p>o R11 - is this requirement being moved to COM-003?</p> <p><b>Response:</b> The OPCP SDT is vetting this requirement and it will be in COM-003.</p> <p>o Data Retention - Is data retention really going to be just 12 months? Most auditors seem to be asking for everything since the last audit.</p> <p><b>Response:</b> The Data Retention section of the standard conforms to the NERC guidelines. The RCSDT has also added the following to the data retention section:</p> <p style="padding-left: 40px;">The following evidence retention periods identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit.</p>
<p><b>Response:</b> The RCSDT thanks you for your comment. Please see responses above.</p>		
CECD	No	<p>Based on the drafting teams response that the definition of Interpersonal" clarifies the exclusion of media dedicated to Telemetry or other data exchange, the term Interpersonal Communication should be replaced with verbal communication capabilities. The term Alternative Interpersonal Communication should be replaced with alternative verbal communication capability that is able to serve as a substitute for and does not</p>

Organization	Yes or No	Question 1 Comment
		utilize the same infrastructure (medium) as verbal communications capabilities used for day-to-day operations.
<p><b>Response:</b> The RCSDT thanks you for your comment. The RCSDT wrote the definitions to include verbal as well as written communication, and the Measures provide examples of person to person communications.</p>		
Indeck Energy Services	No	
City of Springfield, IL - City Water Light and Power (CWLP)	No	<p>The definition of “Interpersonal Communications” is overly broad and does not address the functional needs of reliability coordination. The definition should be limited to systems utilized for essential reliability functions. While the Purpose statement in the standard does address this intent, the explicit inclusion in the definition removes all ambiguity. Further, the definition of “Alternative Interpersonal Communications” without corresponding explicit definition of Primary Interpersonal Communications may lead to confusion and unnecessary duplication of efforts in testing and maintenance.</p>
<p><b>Response:</b> The RCSDT thanks you for your comment. The overall mission of reliability standards is for entities to address essential reliability functions.</p>		
Independent Electricity System Operator	No	<p>(1) NERC filed with FERC on August 10, 2009 indicating that it would discontinue the use of sub-requirements in standards. All draft standards posted since have the format of Part Numbers within each main Requirement. Please revise the standards in this project accordingly.</p> <p><b>Response:</b> The RCSDT agrees and this revision will be made.</p> <p>(2) Having defined the terms Interpersonal Communication and Alternative Interpersonal Communication, the phrase “to exchange Interconnection and operating information” in a number of requirements is redundant and can be removed. Further, for R1, we suggest removing the phrase “within the same Interconnection since there RCs between two Interconnections still need to communication with each other for reliability coordination (e.g. curtailment of interchange transactions crossing Interconnection boundary, as stipulated in IRO-006).</p> <p><b>Response:</b> The RCSDT agrees and have removed the phrase “to exchange Interconnection and operating information” from R1-R8. This helps clarify the intent that the capability is NOT for data exchange, as data is covered under the provisions of the recently approved IRO-010-1a.</p> <p>The phrase “within the same interconnection” is added for the case of ERCOT which has only DC tie lines with the Eastern Interconnection and has minimal interchange.</p> <p>(3) R2: Suggest to add Purchasing-Selling Entity and Interchange Authority (INT-004 and INT-005 have requirements for communication between the RC and the PSE and IA), and remove the phrase “within the</p>

Organization	Yes or No	Question 1 Comment
		<p>same Interconnection since there RCs between two Interconnections still need to communication with each other for reliability coordination (e.g. curtailment of interchange transactions crossing Interconnection boundary, as stipulated in IRO-006).</p> <p><b>Response:</b> The applicability of COM-001 and COM-002 were revised to include the same reliability entities: RC, TOP, BA, DP and GOP. LSE, PSE and TSP were removed from the applicability of these standards per stakeholder suggestion.</p> <p>The phrase “within the same interconnection” is added for the case of ERCOT which has only DC tie lines with the Eastern Interconnection and has minimal interchange.</p> <p>(4) R3: Suggest to add adjacent Transmission Operator and Purchasing-Selling Entity (the latter needed for meeting INT-004 requirements).</p> <p><b>Response:</b> The SDT has included the following Part 3.5 of Requirement R3:</p> <p style="padding-left: 40px;">3.5 Adjacent Transmission Operators synchronously connected within the same Interconnection</p> <p>The applicability of COM-001 and COM-002 were revised to include the same reliability entities: RC, TOP, BA, DP and GOP. LSE, PSE and TSP were removed from the applicability of these standards per stakeholder suggestion.</p> <p>(5) The list of entities in R4 and R6 is different from those in R3 and R5. They should be the same for having Alternative Interpersonal Communication capability.</p> <p><b>Response:</b> The RCSDT asserts the standard meets FERC Order 693 regarding DP and GOP entities by requiring these entities to have Interpersonal Communication capability. Additionally requiring DP and GOP entities to have Alternative Interpersonal Communication capability only imposes more cost on smaller DP and GOP entities that have little or no risk impact to the bulk electric system.</p> <p>(6) R5: Suggest to add adjacent Balancing Authority as adjoining BAs need to communication with each to check schedules and other balancing information.</p> <p><b>Response:</b> The SDT has included the following Part 5.6 of Requirement R5:</p> <p style="padding-left: 40px;">5.6 Adjacent Balancing Authorities</p> <p>Note that this is a defined term in the glossary: “A Balancing Authority Area that is interconnected (to) another Balancing Authority Area either directly or via a multi-party agreement or transmission tariff.”</p> <p>(7) There are a number of parts in Requirements R1 to R8 each of which must be complied with. However, the VSLs for R1 to R8 are binary which do not provide any distinction in partial failure of each of these requirements. We suggest the SDT to apply the VSL guideline and re-establish the various levels of violation</p>

Organization	Yes or No	Question 1 Comment
		severity for these requirements. <b>Response:</b> Each entity listed in Requirements R1-R8 is required to meet the contents with respect to each other entity listed in the requirement. Failure to have the capability with a single entity is a single violation of the requirement. For example, if an RC has 5 BA's within it Area and fails to have Interpersonal Communications with two of them, then the RC has violated the requirement twice. The VSLs are written to address each violation of the Requirement. We have removed the words "or more" from the VSLs.
<b>Response:</b> The RCSDT thanks you for your comment. Please see responses above.		
Bonneville Power Administration	Yes	
Xcel Energy	No	We feel that either the definitions, or the requirements, should make it clear whether data is included.
<b>Response:</b> The RCSDT thanks you for your comment. The SDT has made modifications to attempt to make this as clear as possible.		

2. The RCSDT believes that the requirements of TOP-001-1 obviate the need to develop additional requirements to address Xcel’s comment. Do you agree? If not, please explain in the comment area below.

**Summary Consideration:**

The original justification that the RCSDT posited for not adding a requirement to directly address Xcel Energy’s comments in paragraph 516 and FERC’s related recommendation in paragraph 523 was that TOP-001-1 R3 was considered to address this concern. Since that time, the RTO SDT has proposed to retire TOP-001-1 R3. However, FERC has since retired IRO-004-1 R3 and R5 along with IRO-005-3 R5. Because these are retired, there are no longer any requirements that would force a TOP to wait for a delayed RC response during an emergency, therefore the question is resolved, albeit differently than it was proposed to be resolved in this posting. If an RC were to give a Reliability Directive to a TOP that the TOP considered “would violate safety, equipment, regulatory, or statutory requirements,” the TOP may respond to the RC that it cannot comply.

Organization	Yes or No	Question 2 Comment
Northeast Power Coordinating Council	No	If the requirement were going to remain, but the Project 2007-03 Real-Time Operations SDT proposed to retire that requirement during their last posting. There needs to be better coordination with that SDT.
<p><b>Response:</b> The RCSDT thanks you for your comment. The RTO SDT proposes to retire TOP-001-1 R3. However, since NERC has retired IRO-004-1 R3 and R5 along with IRO-005-3 R5 , there are no longer any requirements that would force a TOP to wait for a delayed RC response during an emergency, therefore the question is resolved, albeit differently than it was proposed to be resolved in this posting. If an RC were to give a Reliability Directive to a TOP that the TOP considered “would violate safety, equipment, regulatory, or statutory requirement,” the TOP may respond to the RC that it cannot comply.</p>		
Bonneville Power Administration	Yes	
PPL	Yes	
Dominion	Yes	
SERC OC Standards Review Group	No	Top-001-1, Requirement R3, which is what the SDT appears to be using as its justification for not adding a requirement here is proposed to be deleted by the RTO-SDT on Project 2007-03.
<p><b>Response:</b> The SDT thanks you for your comment. The RTO SDT proposes to retire TOP-001-1 R3. However, since NERC has retired IRO-004-1 R3 and R5 along with IRO-005-3 R5 , there are no longer any requirements that would force a TOP to wait for a delayed RC response during an emergency, therefore the question is resolved, albeit differently than it was proposed to be resolved in this posting. If an RC were to give a Reliability Directive to a TOP that the TOP considered “would violate safety, equipment, regulatory, or statutory requirement,” the TOP may respond to the RC that it cannot comply.</p>		

**Consideration of Comments on Reliability Coordination — Project 2006-06**

Organization	Yes or No	Question 2 Comment
IRC Standards Review Committee	No	It might if the requirement were going to remain but the Project 2007-03 Real-Time Operations SDT proposed to retire that requirement during their last posting. We believe there needs to be better coordination with that SDT.
<p><b>Response:</b> The SDT thanks you for your comment. The RTO SDT proposes to retire TOP-001-1 R3. However, since NERC has retired IRO-004-1 R3 and R5 along with IRO-005-3 R5 , there are no longer any requirements that would force a TOP to wait for a delayed RC response during an emergency, therefore the question is resolved, albeit differently than it was proposed to be resolved in this posting. If an RC were to give a Reliability Directive to a TOP that the TOP considered “would violate safety, equipment, regulatory, or statutory requirement,” the TOP may respond to the RC that it cannot comply.</p>		
MRO's NERC Standards Review Subcommittee	No	<p>A. Agree that a receiving entity should not be held accountable until such time that they are required to take such action.</p> <p>B. It might if the requirement were going to remain but the Project 2007-03 (“Real-Time Operations SDT”) proposed to retire that requirement during their last posting. This needs to be coordinated with that SDT.</p>
<p><b>Response:</b> The SDT thanks you for your comment. The RTO SDT proposes to retire TOP-001-1 R3. However, since NERC has retired IRO-004-1 R3 and R5 along with IRO-005-3 R5 , there are no longer any requirements that would force a TOP to wait for a delayed RC response during an emergency, therefore the question is resolved, albeit differently than it was proposed to be resolved in this posting. If an RC were to give a Reliability Directive to a TOP that the TOP considered “would violate safety, equipment, regulatory, or statutory requirement,” the TOP may respond to the RC that it cannot comply.</p>		
FirstEnergy	Yes	
Midwest ISO Standards Collaborators	No	It might if the requirement were going to remain but the Project 2007-03 Real-Time Operations SDT proposed to retire that requirement during their last posting. This needs to be coordinated with that SDT.
<p><b>Response:</b> The SDT thanks you for your comment. The RTO SDT proposes to retire TOP-001-1 R3. However, since NERC has retired IRO-004-1 R3 and R5 along with IRO-005-3 R5 , there are no longer any requirements that would force a TOP to wait for a delayed RC response during an emergency, therefore the question is resolved, albeit differently than it was proposed to be resolved in this posting. If an RC were to give a Reliability Directive to a TOP that the TOP considered “would violate safety, equipment, regulatory, or statutory requirement,” the TOP may respond to the RC that it cannot comply.</p>		
SPP Standards Development	Yes	In fact, we believe that R1, R2 and R5 more specifically put that requirement on the TOP. The TOP doesn't have to wait for the RC and any directive that may be associated with R3 prior to taking action to mitigate an emergency condition.
<p><b>Response:</b> The SDT thanks you for your comment.</p>		



Consideration of Comments on Reliability Coordination — Project 2006-06

Organization	Yes or No	Question 2 Comment
Kansas City Power & Light	Yes	
Exelon	Yes	
PacifiCorp	Yes	
Arizona Public Service Company	Yes	
Southern Company	No	<p>Comments: I see no connection between XCEL's comment on COM-001-1. The requirements of COM-001-1 require the RCs, TOPs, and BAs to have a primary interpersonal communications method and to designate an alternative. I believe that if the requirements for the entity to have both primary and alternative methods of interpersonal communications this objection could be cleared. For example, R2 Each Reliability Coordinator shall designate have an Alternative Interpersonal Communications capability with the following entities to exchange Interconnection and operating information</p>
<p><b>Response:</b> Thank you for your comment. We agree that there is no connection between Xcel's concern and COM-001-1.</p>		
Green Country Energy, Green Country Operating Services		No Comment
Manitoba Hydro	Yes	
NextEra Energy, Inc.	No	<p>As stated in response to number 1, Reliability Standards are to be clear and complete. If a Transmission Operator is not responsible for a delay caused by a Reliability Coordinator, the Standard should specifically state that the Transmission Operator does not need to wait for an assessment or approval of a Reliability Coordinator to take actions pursuant to TOP-001-1 R3. Since the Reliability Coordinator is atop the reliability hierarchy, such a statement provides clarity and completeness to understanding a Transmission Operators rights. Thus, TOP-001-1 R3 should be revised to lead with: "Without any obligation to first seek and obtain an assessment or approval from its Reliability Coordinator, each Transmission Operator . . . ."</p>
<p><b>Response:</b> The SDT thanks you for your comment. The RTO SDT proposes to retire TOP-001-1 R3. However, since NERC has retired IRO-004-1 R3 and R5 along with IRO-005-3 R5 , there are no longer any requirements that would force a TOP to wait for a delayed RC response during an emergency, therefore the question is resolved, albeit differently than it was proposed to be resolved in this posting. If an RC were to give a Reliability Directive to a TOP that the TOP considered "would violate safety, equipment, regulatory, or statutory requirement," the TOP may respond to the RC that it cannot comply.</p>		

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Organization	Yes or No	Question 2 Comment
United Illuminating Company	Yes	
American Electric Power	Yes	
Pepco Holdings Inc	Yes	
American Transmission Company	Yes	
ISO New England	No	It might if the requirement were going to remain but the Project 2007-03 Real-Time Operations SDT proposed to retire that requirement during their last posting. We believe there needs to be better coordination with that SDT.
<p><b>Response:</b> The SDT thanks you for your comment. The RTO SDT proposes to retire TOP-001-1 R3. However, since NERC has retired IRO-004-1 R3 and R5 along with IRO-005-3 R5 , there are no longer any requirements that would force a TOP to wait for a delayed RC response during an emergency, therefore the question is resolved, albeit differently than it was proposed to be resolved in this posting. If an RC were to give a Reliability Directive to a TOP that the TOP considered “would violate safety, equipment, regulatory, or statutory requirement,” the TOP may respond to the RC that it cannot comply.</p>		
ERCOT ISO	No	It might if the requirement were going to remain but the Project 2007-03 Real-Time Operations SDT proposed to retire that requirement during their last posting. We believe there needs to be better coordination with that SDT.
<p><b>Response:</b> The SDT thanks you for your comment. The RTO SDT proposes to retire TOP-001-1 R3. However, since NERC has retired IRO-004-1 R3 and R5 along with IRO-005-3 R5 , there are no longer any requirements that would force a TOP to wait for a delayed RC response during an emergency, therefore the question is resolved, albeit differently than it was proposed to be resolved in this posting. If an RC were to give a Reliability Directive to a TOP that the TOP considered “would violate safety, equipment, regulatory, or statutory requirement,” the TOP may respond to the RC that it cannot comply.</p>		
WECC	Yes	
BGE	Yes	BGE has no additional comments.
<p><b>Response:</b> Thank you for your comment.</p>		
Constellation Energy Commodities Group	Yes	

**Consideration of Comments on Reliability Coordination — Project 2006-06**

Organization	Yes or No	Question 2 Comment
Duke Energy	No	Requirements of TOP-001-1 are being revised under Project 2007-03, which may not continue to adequately address Xcel's concern.
<p><b>Response:</b> The SDT thanks you for your comment. The RTO SDT proposes to retire TOP-001-1 R3. However, since NERC has retired IRO-004-1 R3 and R5 along with IRO-005-3 R5 , there are no longer any requirements that would force a TOP to wait for a delayed RC response during an emergency, therefore the question is resolved, albeit differently than it was proposed to be resolved in this posting. If an RC were to give a Reliability Directive to a TOP that the TOP considered "would violate safety, equipment, regulatory, or statutory requirement," the TOP may respond to the RC that it cannot comply.</p>		
Indeck Energy Services	Yes	
City of Springfield, IL - City Water Light and Power (CWLP)	No	TOP-001 is in the process of being substantially modified by Project 2007-03. These changes may conflict with the matter addressed by Xcel's comment. Thus, Xcel's concern should be addressed independently but in the context of the TOP-001-2 revisions proposed by Project 2007-03.
<p><b>Response:</b> The SDT thanks you for your comment. The RTO SDT proposes to retire TOP-001-1 R3. However, since NERC has retired IRO-004-1 R3 and R5 along with IRO-005-3 R5 , there are no longer any requirements that would force a TOP to wait for a delayed RC response during an emergency, therefore the question is resolved, albeit differently than it was proposed to be resolved in this posting. If an RC were to give a Reliability Directive to a TOP that the TOP considered "would violate safety, equipment, regulatory, or statutory requirement," the TOP may respond to the RC that it cannot comply.</p>		
South Carolina Electric and Gas	No	Top-001-1, Requirement R3, which is what the SDT appears to be using as its justification for not adding a requirement here is proposed to be deleted by the RTO-SDT on Project 2007-03.
<p><b>Response:</b> The SDT thanks you for your comment. The RTO SDT proposes to retire TOP-001-1 R3. However, since NERC has retired IRO-004-1 R3 and R5 along with IRO-005-3 R5 , there are no longer any requirements that would force a TOP to wait for a delayed RC response during an emergency, therefore the question is resolved, albeit differently than it was proposed to be resolved in this posting. If an RC were to give a Reliability Directive to a TOP that the TOP considered "would violate safety, equipment, regulatory, or statutory requirement," the TOP may respond to the RC that it cannot comply.</p>		
Independent Electricity System Operator	No	TOP-001 is being revised and some of the requirements that fulfill this need may have been removed. We suggest the SDT check with the latest draft version of TOP-001 and coordinate with the Real-time Operation SDT to ensure there are not gaps.
<p><b>Response:</b> The SDT thanks you for your comment. The RTO SDT proposes to retire TOP-001-1 R3. However, since NERC has retired IRO-004-1 R3 and R5 along with IRO-005-3 R5 , there are no longer any requirements that would force a TOP to wait for a delayed RC response during an emergency, therefore the question is resolved, albeit differently than it was proposed to be resolved in this posting. If an RC were to give a Reliability Directive to a TOP that the TOP considered "would violate safety, equipment, regulatory, or statutory requirement," the TOP may respond to the RC that it cannot comply.</p>		

Organization	Yes or No	Question 2 Comment
Xcel Energy	No	<p>We are concerned that the drafting team may not have understood Xcel Energy’s comments and FERC’s directive in Order 693. FERC had asked that NERC consider Xcel Energy’s suggestion. This consideration does not necessarily equate to the development of additional requirements, however that may be the solution. We recognize that R1 and R2 of TOP-001-1 give the TOP authority to take immediate actions necessary to alleviate operating emergencies. We were concerned with the potential situation where the RC’s directive (R3 of IRO-001-2) may conflict with actions the TOP has ALREADY taken. In this situation, we do not feel the TOP should be held at fault for the actions it took prior to the RC’s directive. (R3 of IRO-001-2 is currently in effect under TOP-001-1 R3.) Additionally, R1 and R2 of TOP-001-1 have been removed from the latest draft of version 2. So, if TOP-001-2 and IRO-001-2 are approved as drafted, it would appear that all rights and protections of the TOP to take immediate actions will be removed and our initial issue, as detailed in Order 693, still exists.</p>
<p><b>Response:</b> The SDT thanks you for your comment. The RTO SDT proposes to retire TOP-001-1 R3. However, since NERC has retired IRO-004-1 R3 and R5 along with IRO-005-3 R5 , there are no longer any requirements that would force a TOP to wait for a delayed RC response during an emergency, therefore the question is resolved, albeit differently than it was proposed to be resolved in this posting. If an RC were to give a Reliability Directive to a TOP that the TOP considered “would violate safety, equipment, regulatory, or statutory requirement,” the TOP may respond to the RC that it cannot comply.</p> <p>The SDT appreciates this clarification by Xcel Energy. At any time in the future, Reliability Directives may be received that, based on the best available information at the time, change or reverse operating actions taken in the past, even the immediate past. The TOP is not held at fault for past actions that it took to protect the BES by any current or proposed NERC requirements. As written in TOP-001-2 R1, R3 and R4 as proposed by the RTO SDT, the TOP is not prevented from acting or telling the RC that for specific safety, equipment, regulatory or statutory reasons, it cannot comply.</p>		

3. Do you agree with the revision to IRO-001, R1 for certifying Reliability Coordinators? If not, please explain in the comment area below.

**Summary Consideration:** Stakeholders were asked if they agree with the revision to IRO-001, R1 for certifying Reliability Coordinators. Many commenters suggested removing the requirement because it is addressed in the NERC Rules of Procedure. The RCSDT concurs and has removed R1 from IRO-001-2.

Organization	Yes or No	Question 3 Comment
ERCOT ISO	No	<p>The language “to continuously assess transmission reliability” should be changed to “to continuously assess Bulk Electric System reliability” to reflect what the enforceability of the standards are meant to be.</p> <p>The requirement on the ERO should also be expanded similar to BAL-005-0.1b R1 to ensure that all operating entities and the entire BES is covered under a Reliability Coordinator.</p> <p>In R2, should “of” be “to”? Reliability Directives are issued to TOPs, BA, etc.</p> <p>The VSL for R1 is not consistent with the requirement. The requirement applies to the ERO but the VSL applies to the Regional Entity.</p>
ISO New England	No	<p>The language “to continuously assess transmission reliability” should be changed to “to continuously assess Bulk Electric System reliability” to reflect what the enforceability of the standards are meant to be.</p> <p>The requirement on the ERO should also be expanded similar to BAL-005-0.1b R1 to ensure that all operating entities and the entire BES is covered under a Reliability Coordinator.</p> <p>In R2, should “of” be “to”? Reliability Directives are issued to TOPs, BA, etc.</p> <p>The VSL for R1 is not consistent with the requirement. The requirement applies to the ERO but the VSL applies to the Regional Entity.</p>
IRC Standards Review Committee	No	<p>The language “to continuously assess transmission reliability” should be changed to “to continuously assess Bulk Electric System reliability” to reflect what the enforceability of the standards are meant to be.</p> <p>The requirement on the ERO should also be expanded similar to BAL-005-0.1b R1 to ensure that all operating entities and the entire BES is covered under a Reliability Coordinator.</p> <p>In R2, should “of” be “to”? Reliability Directives are issued to TOPs, BA, etc.</p> <p>The VSL for R1 is not consistent with the requirement. The requirement applies to the ERO but the VSL applies to the Regional Entity.</p>

Organization	Yes or No	Question 3 Comment
Northeast Power Coordinating Council	No	<p>The language “to continuously assess transmission reliability” should be changed to “to continuously assess Bulk Electric System reliability” to reflect what the enforceability of the standards are meant to be.</p> <p><b>Response:</b> Many commenters suggested removing the requirement because it is addressed in the NERC Rules of Procedure. The RCSDT concurs and has removed R1 from IRO-001-2.</p> <p>The requirement on the ERO should also be expanded similar to BAL-005-0.1b R1 to ensure that all operating entities and the entire BES are covered under a Reliability Coordinator.</p> <p><b>Response:</b> R1 has been removed from the standard based on stakeholder comments.</p> <p>In R2, should “of” be “to”? Reliability Directives are issued to TOPs, BA, etc.</p> <p><b>Response:</b> The requirement was rewritten for clarity as follows:</p> <p style="padding-left: 40px;">R2. Each Reliability Coordinator shall take actions or direct actions (which could include issuing Reliability Directives) by Transmission Operators, Balancing Authorities, Generator Operators, and Distribution Providers within its Reliability Coordinator Area to prevent identified events or mitigate the magnitude or duration of actual events that result in Adverse Reliability Impacts.</p> <p>The VSL for R1 is not consistent with the requirement. The requirement applies to the ERO but the VSL applies to the Regional Entity.</p> <p><b>Response:</b> R1 has been removed from the standard based on stakeholder comments.</p>
<b>Response:</b> The RCSDT thanks you for your comment.		
Bonneville Power Administration	Yes	
PPL	Yes	
SERC OC Standards Review Group	No	<p>We think you are attempting to create a requirement similar to BAL-005, R1. That language copied here is clear and concise - All generation, transmission, and load operating within an Interconnection must be included within the metered boundaries of a Balancing Authority Area.</p>
<b>Response:</b> The RCSDT thanks you for your comment. Many commenters suggested removing the requirement because it is addressed in the NERC Rules of Procedure. The RCSDT concurs and has removed R1 from IRO-001-2.		
MRO's NERC Standards Review	No	<p>A. R1, As written it is unclear what level of certification this will entail? Presently written within the NERC Reliability Standards, responsibility is given to RC's to manage the reliability of their areas. Recommend</p>

Organization	Yes or No	Question 3 Comment
Subcommittee		<p>deleting this requirement. The ERO has pushed back in other Standards to having a responsibility for any NERC Requirements, since they are not a user, owner, or operator of the BES (see EOP-004-2).</p> <p><b>Response:</b> Many commenters also suggested removing the requirement because it is addressed in the NERC Rules of Procedure. The RCSDT concurs and has removed R1 from IRO-001-2.</p> <p>If this does move forward and an RC is certified by the ERO and then the RC is found non-compliant by a Regional Entity, for an associated certified item, will the ERO be held responsible, too?</p> <p><b>Response:</b> The RCSDT has removed R1 from IRO-001-2.</p> <p>If the SDT selects to keep R1, there are some issues with how the requirement is written. The requirement places emphasis on regions and regional boundaries when no emphasis should be placed there. There are multiple Reliability Coordinators the span multiple regions.</p> <p><b>Response:</b> The RCSDT has removed R1 from IRO-001-2.</p> <p>The language “to continuously assess transmission reliability” should be changed to “to continuously assess Bulk Electric System reliability” to reflect on what the standards are enforceable.</p> <p>The requirement on the ERO should also be expanded similar to BAL-005-0.1b R1 to ensure that all operating entities and the entire BES is covered under a Reliability Coordinator.</p> <p>B. In R2, should “of” be “to”. Reliability Directives are issued to TOPs, BA, etc.</p> <p>C. The VSL for R1 is not consistent with the requirement. The requirement applies to the ERO but the VSL applies to the Regional Entity.</p> <p><b>Response:</b> Please see the response to the comments from NPCC above on these same topics..</p>
<p><b>Response:</b> The RCSDT thanks you for your comment.</p>		
FirstEnergy	Yes	
Midwest ISO Standards Collaborators	No	<p>In general, we are not opposed to the concept of the ERO certifying the Reliability Coordinators; however, there are some issues with how the requirement is written.</p> <p><b>Response:</b> Thank you.</p> <p>The requirement places emphasis on regions and regional boundaries when no emphasis should be placed</p>

Organization	Yes or No	Question 3 Comment
		<p>there. There are multiple Reliability Coordinators that span multiple regions.</p> <p><b>Response:</b> Many commenters suggested removing the requirement because it is addressed in the NERC Rules of Procedure. The RCSDT concurs and has removed R1 from IRO-001-2.</p> <p>The language “to continuously assess transmission reliability” should be changed to “to continuously assess Bulk Electric System reliability” to reflect on what the standards are enforceable.</p> <p>The requirement on the ERO should also be expanded similar to BAL-005-0.1b R1 to ensure that all operating entities and the entire BES is covered under a Reliability Coordinator Area.</p> <p>In R2, should “of” be “to”. Reliability Directives are issued to TOPs, BA, etc.</p> <p>The VSL for R1 is not consistent with the requirement. The requirement applies to the ERO but the VSL applies to the Regional Entity.</p> <p><b>Response:</b> Please see the response to the comments from NPCC above on these same topics..</p>
<p><b>Response:</b> The RCSDT thanks you for your comment.</p>		
SPP Standards Development	No	<p>Is this more of a registry question than a standards issue? While we agree that there needs to be a requirement somewhere that establishes the need for Reliability Coordinators, isn't there also a similar need for other functional entities such as Transmission Operators, Balancing Authorities, etc? Should these be captured in standards or in the certification/registration process?</p>
<p><b>Response:</b> The RCSDT thanks you for your comment. Many commenters suggested removing the requirement because it is addressed in the NERC Rules of Procedure. The RCSDT concurs and has removed R1 from IRO-001-2.</p>		
Kansas City Power & Light	Yes	
Exelon		No comment - only applicable to RC
PacifiCorp	Yes	
Southern Company	No	<p>Comments: This would allow NERC to designate one entity to be the Reliability Coordinator for an entire interconnection or the entire continent. This would reduce the Regional Reliability Organizations to</p>



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Organization	Yes or No	Question 3 Comment
		compliance entities.
<p><b>Response:</b> The RCSDT thanks you for your comment. Many commenters suggested removing the requirement because it is addressed in the NERC Rules of Procedure. The RCSDT concurs and has removed R1 from IRO-001-2.</p>		
Green Country Energy, Green Country Operating Services		No Comment
Manitoba Hydro	Yes	
United Illuminating Company	Yes	
American Electric Power	No	This is out of scope with the standard, as it is currently addressed through the NERC certification process that the NERC reliability coordinators are subject to.
<p><b>Response:</b> The RCSDT thanks you for your comment. Many commenters suggested removing the requirement because it is addressed in the NERC Rules of Procedure. The RCSDT concurs and has removed R1 from IRO-001-2.</p>		
Pepco Holdings Inc	Yes	
American Transmission Company	Yes	
WECC	Yes	
BGE	Yes	BGE has no additional comments.
Constellation Energy Commodities Group	Yes	
Duke Energy	No	<p>How is NERC going to certify the RCs?</p> <p><b>Response:</b> R1 is a revision of an existing requirement in IRO-001-1.1. Many commenters suggested removing the requirement because it is addressed in the NERC Rules of Procedure. The RCSDT concurs and has removed R1 from IRO-001-2. The NERC Rules of Procedure define the certification process and the level of certification.</p>

Organization	Yes or No	Question 3 Comment
		<p>Also, we believe the word “all” should be inserted after the word “among”, so that it is clear that all generation, transmission and load must be included.</p> <p><b>Response:</b> Many commenters suggested removing the requirement because it is addressed in the NERC Rules of Procedure. The RCSDT concurs and has removed R1 from IRO-001-2.</p>
<p><b>Response:</b> The RCSDT thanks you for your comment.</p>		
CECD	Yes	
Indeck Energy Services	No	
City of Springfield, IL - City Water Light and Power (CWLP)	Yes	
South Carolina Electric and Gas	No	<p>We think you are attempting to create a requirement similar to BAL-005, R1. That language copied here is clear and concise - All generation, transmission, and load operating within an Interconnection must be included within the metered boundaries of a Balancing Authority Area.</p>
<p><b>Response:</b> The RCSDT thanks you for your comment. Many commenters suggested removing the requirement because it is addressed in the NERC Rules of Procedure. The RCSDT concurs and has removed R1 from IRO-001-2.</p>		
Independent Electricity System Operator	No	<p>1. R2: The word “of” before Transmission Operators should be “to”.</p> <p><b>Response:</b> The requirement was rewritten for clarity as follows:</p> <p>R2. Each Reliability Coordinator shall take actions or direct actions (which could include issuing Reliability Directives) by Transmission Operators, Balancing Authorities, Generator Operators, and Distribution Providers within its Reliability Coordinator Area to prevent identified events or mitigate the magnitude or duration of actual events that result in Adverse Reliability Impacts.</p> <p>2. The VSL for R1 should be revised to replace Regional Entities with ERO.</p> <p><b>Response:</b> Many commenters suggested removing the requirement because it is addressed in the NERC Rules of Procedure. The RCSDT concurs and has removed R1 from IRO-001-2.</p>
<p><b>Response:</b> The RCSDT thanks you for your comment.</p>		

4.

Do you agree with moving two requirements from IRO-001 back to IRO-002 relating to Analysis Tool outages? If not, please explain in the comment area below.

**Summary Consideration:** There were no comments on this question. The SDT thanks you for your consideration of and agreement with this position.

Organization	Yes or No	Question 4 Comment
Northeast Power Coordinating Council	Yes	
Bonneville Power Administration	Yes	
PPL	Yes	
SERC OC Standards Review Group	Yes	
IRC Standards Review Committee	Yes	
MRO's NERC Standards Review Subcommittee	Yes	
FirstEnergy	Yes	
Midwest ISO Standards Collaborators	Yes	
SPP Standards Development	Yes	
Kansas City Power & Light	Yes	
Exelon		Comments: No comment - only applicable to RC
PacifiCorp	Yes	

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Organization	Yes or No	Question 4 Comment
Arizona Public Service Company	Yes	
Southern Company	Yes	
Green Country Energy, Green Country Operating Services		No Comment
Manitoba Hydro	Yes	
United Illuminating Company	Yes	
Pepco Holdings Inc	Yes	
American Transmission Company	Yes	
ISO New England	Yes	
ERCOT ISO	Yes	
WECC	Yes	
BGE	Yes	BGE has no additional comments.
Constellation Energy Commodities Group	Yes	
Duke Energy	Yes	
CECD	Yes	
Indeck Energy Services	Yes	
South Carolina Electric and Gas	Yes	

**Consideration of Comments on Reliability Coordination — Project 2006-06**

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Organization	Yes or No	Question 4 Comment
Independent Electricity System Operator	Yes	

5. Do you agree with moving two requirements from IRO-001 back to IRO-005 relating to Reliability Coordinator notifications? If not, please explain in the comment area below.

**Summary Consideration:** Commenters noted a typographical error in R1 which was corrected to read

R1. When the results of an Operational Planning Analysis or Real-time Assessment indicate an expected or actual condition with Adverse Reliability Impacts within its Reliability Coordinator Area, each Reliability Coordinator shall notify ~~issue an alert~~ to all impacted Transmission Operators and Balancing Authorities in its Reliability Coordinator Area. *[Violation Risk Factor: High] [Time Horizon: Real-time Operations, Same Day Operations and Operations Planning]*

One commenter also asked that an errant yellow text box be removed from Page 1, which was also done.

Organization	Yes or No	Question 5 Comment
Northeast Power Coordinating Council	No	R1 states “When the results of an Operational Planning Analysis or Real-time Assessment indicate an expected or actual condition with Adverse Reliability Impacts within its Reliability Coordinator Area, each Reliability Coordinator shall notify issue an alert to all impacted Transmission Operators and Balancing Authorities in its Reliability Coordinator Area.” The word “notify” should be struck.
<b>Response:</b> The SDT thanks you for your comment and will correct this typographical error to remove the words “issue an alert.”		
Bonneville Power Administration	Yes	
PPL	Yes	
SERC OC Standards Review Group	Yes	Please remove the yellow box on page 1 indicating this standard will be retired.
<b>Response:</b> The SDT thanks you for your comment and will remove the yellow box on page 1.		
IRC Standards Review Committee	Yes	R1 states “When the results of an Operational Planning Analysis or Real-time Assessment indicate an expected or actual condition with Adverse Reliability Impacts within its Reliability Coordinator Area, each Reliability Coordinator shall notify issue an alert to all impacted Transmission Operators and Balancing Authorities in its Reliability Coordinator Area.” The word “notify” should be struck.
<b>Response:</b> The SDT thanks you for your comment and will correct this typographical error to remove the words “issue an alert.”		

Consideration of Comments on Reliability Coordination — Project 2006-06

Organization	Yes or No	Question 5 Comment
MRO's NERC Standards Review Subcommittee	Yes	
FirstEnergy	Yes	
Midwest ISO Standards Collaborators	Yes	
SPP Standards Development	Yes	
Kansas City Power & Light	Yes	
Exelon		Comments: No comment - only applicable to RC
PacifiCorp	Yes	
Arizona Public Service Company	Yes	
Southern Company	Yes	
Green Country Energy, Green Country Operating Services		No Comment
Manitoba Hydro	Yes	
United Illuminating Company	Yes	
Pepco Holdings Inc	Yes	
American Transmission Company	Yes	
ISO New England	Yes	R1 states "When the results of an Operational Planning Analysis or Real-time Assessment indicate an expected or actual condition with Adverse Reliability Impacts within its Reliability Coordinator Area, each Reliability Coordinator shall notify issue an alert to all impacted Transmission Operators and Balancing



Organization	Yes or No	Question 5 Comment
		Authorities in its Reliability Coordinator Area.” The word “notify” should be struck.
<b>Response:</b> The SDT thanks you for your comment and will correct this typographical error to remove the words “issue an alert.”		
ERCOT ISO	Yes	R1 states “When the results of an Operational Planning Analysis or Real-time Assessment indicate an expected or actual condition with Adverse Reliability Impacts within its Reliability Coordinator Area, each Reliability Coordinator shall notify issue an alert to all impacted Transmission Operators and Balancing Authorities in its Reliability Coordinator Area.” The word “notify” should be struck.
<b>Response:</b> The SDT thanks you for your comment and will correct this typographical error to remove the words “issue an alert.”		
WECC	Yes	
BGE	Yes	BGE has no additional comments.
Constellation Energy Commodities Group	Yes	
Duke Energy	Yes	
CECD	Yes	
Indeck Energy Services	Yes	
South Carolina Electric and Gas	Yes	
Independent Electricity System Operator	Yes	

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

**Summary Consideration:**

The RCSDT received comments suggesting clarification of COM-002-3. The RCSDT intends the communication of Reliability Directives to be person-to-person and in such a manner that the Reliability Directive is understood and not necessarily repeated verbatim. COM-002-3 is not intended to be prescriptive on how the Reliability Directive is issued. Spoken or written communications are valid methods (i.e. using the telephone, radio, electronic texting, email, etc.). The purpose of COM-002-3 is to ensure emergency communications between operating personnel are effective. There is no proxy requirement for 24/7 operating personnel regarding small entities. Only “capability” as provided for in COM-001-2 is applicable. The RCSDT agrees that the use of Blast Calls to issue Reliability Directives, in mass, is efficient and effective. The RCSDT believes Reliability Directives issued in mass should be defined by procedure, and that the procedure would establish a method of affirmation and notice of implementation. As envisioned, communications protocols would be addressed in the COM-003 standard being developed in Project 2007-02.

Some commenters suggested revisions to IRO-014, requirement R8 to conform to similar requirements R6 and R7. The RCSDT made the suggested revision by re-ordering R8:

R8. During those instances where Reliability Coordinators disagree on the existence of an Adverse Reliability Impact, each Reliability Coordinator shall implement the action plan developed by the Reliability Coordinator that identified the Adverse Reliability Impact unless such actions would violate safety, equipment, regulatory or statutory requirements. [Violation Risk Factor: High][Time Horizon: Operations Planning, Same Day Operations and Real-time Operations]

IRO-014-2, requirement R4 is applicable to those Reliability Coordinators engaged in activities related to requirement R1 and part 1.7, it is unlikely that Reliability Coordinators geographically and electrically distant from one another will have mutually agreed upon operating procedures (per requirement R1), and therefore requirement R4 would not be applicable. The RCSDT believes IRO-014-2, requirement R4 which requires weekly communication provides reasonable contact and flexibility – and this requirement is in effect today. The RCSDT coordinated the use of the NERC Glossary term “Adverse Reliability Impact” with the Real-Time Operations team and continues the practice of informing all RCs of Adverse Reliability Impacts in requirement R5. The RCSDT has revised IRO-014-2, requirements R6-R8 to clarify that when one RC identified a problem and presents an action plan for another RC, the second RC is obligated to implement the action plan. The RCSDT will forward the concern about RC's identifying themselves and the receiver to establish authority to the Project 2007-02, Operating Personnel Communications Protocols SDT. The Project 2007-02 team is developing a standard that includes requirements for use of specific communications protocols.

Organization	Yes or No	Question 6 Comment
Northeast Power Coordinating		The SDT did not address all concerns with COM-002-3 from the last posting. For entities registered as multiple functions, the combination of the definition of Reliability Directive and Requirement R1 could be

Organization	Yes or No	Question 6 Comment
Council		<p>confused to require a company to issue directives to itself. There are several organizations registered as a Reliability Coordinator, Transmission Operator and Balancing Authority. In these companies, it is not uncommon for those responsibilities to be distributed across multiple desks. Thus, for certain situations, a single System Operator may actually be the Reliability Coordinator and the Transmission Operator. In other situations, the System Operator serving the Reliability Coordinator function may be adjacent to the System Operator serving as the Transmission Operator or Balancing Authority. It should never be necessary for these System Operators to issue Reliability Directives to themselves in the first example or to their co-worker in the second example to demonstrate compliance to NERC standards. How the entity coordinates its actions among its Reliability Coordinator, Balancing Authority and Transmission Operator roles is a corporate governance issue that should not be confused or complicated by the NERC standards. Thus, standards should be made clear that the Reliability Directive is directed to another company. In place of requiring an operator, in real-time, to state “this is a Reliability Directive,” there should be an allowance for an entity to develop procedures indicating, in advance, their expectations for three-part communications to their sub-operating entities.</p> <p>Therefore, we suggest modifying R1 to be</p> <p>“When a Reliability Coordinator, Transmission Operator or Balancing Authority requires actions to be executed as a Reliability Directive, the Reliability Coordinator, Transmission Operator or Balancing Authority shall identify the action, either verbally, when the communication is issued, or in advance through documented procedures, as a Reliability Directive to the recipient. [Violation Risk Factor: High][Time Horizon: Real-Time.]”</p> <p><b>Response:</b> COM-002 does not preclude text or other forms of communication for issuing Reliability Directives. However, entities still must comply with the requirements of COM-002. Further, the RCSDT believes it to be equally imperative that each NERC registered function hold the authority to issue Reliability Directives, and the ability to receive Reliability Directives, whether those Reliability Directives are issued to subordinate registered functions within a vertically integrated utility, or to registered entities that are corporately separate. The RCSDT believes the following response to draft 3 comments still holds true:</p> <p style="padding-left: 40px;">“The way that COM-002 is crafted, it focuses on functional entity communication between and among functions. Face-to-face communication of Reliability Directives are subject to the requirements of COM-002 and can be measured for COM-002 by allowing Operator Logs as possible evidence to support compliance”.</p> <p>The use of operator logs to memorialize and provide evidence of compliance is directly specific to those Reliability Directives issued and received within the same control room or operations center. The RCSDT believes that any Registered Entity or person operating as such must understand the intent of the issued Reliability Directive, and that the issuer of the Reliability Directive believe that the Reliability Directive was correctly received. COM-002 should not be construed to mean that an individual serving in two functions be</p>

Organization	Yes or No	Question 6 Comment
		<p>required to issue a Reliability Directive to himself, but rather it is expected that such an individual would appropriately address the reliability issues as required by the function they are serving and its subsequent responsibilities.</p> <p>Also, the definition of Emergency as currently cited in these draft Standards and included in the existing NERC Glossary should be modified to include the NERC Glossary term Adverse Reliability Impact to make the Standards more crisp, clear and enforceable. Because the Project 2007-03 Real-Time Operations SDT proposed to utilize the definition of Adverse Reliability Impact in TOP-001-2 R5 during the last posting, the change to the definition should be coordinated with that team.</p> <p><b>Response:</b> With respect to the suggestion of modifying the definition of Emergency. The RCSDT believes that the term Emergency relates to the actual state of the system, including local and wide area, while an Adverse Reliability Impact is the impact resulting from an event resulting in instability or cascading that affects a widespread area of an Interconnection. There could be an Emergency that is local, or that threatens equipment but which does not necessarily result in cascading or instability; it is in this regard that the RCSDT believes that the definition of Emergency should not be dependent upon or pertain only to Adverse Reliability Impact events. The RCSDT coordinated the use of Adverse Reliability Impacts with the Real-Time Operations team.</p> <p>There is a text box in IRO-005-4 that indicates this standard will be retired. Yet, there still remain requirements in the standard and various other associated documentation that indicates requirements are being move to this standard. Delete the text box.</p> <p><b>Response:</b> We have deleted the text box.</p> <p>Strike IRO-014-2 Part 1.7. There is no need to have a weekly conference to discuss every Operating Procedure, Operating Process and Operating Plan. As this requirement is written, a conference call would be necessary for each. Furthermore, IRO-014-2 R4 already includes a requirement to have weekly conference calls that should suffice. IRO-014-2 R2 seems to recognize that these Operating Procedures, Processes and Plans likely will not need to be discussed weekly as it only requires an annual update.</p> <p><b>Response:</b> The intent of R1 is for Reliability Coordinators to coordinate specific activities with other impacted Reliability Coordinators. These activities are listed as sub requirements. R1.7 requires you to have a procedure relating to weekly conference calls while R4 requires participation in weekly calls. Further, the RCSDT believes that it is prudent that Reliability Coordinators talk at least once a week to verify viability of mutual plans, procedures or processes.</p> <p>With respect to the relation of IRO-14-2 R1.7 and R4. R1.7 is requires you to have a procedure relating to</p>

Organization	Yes or No	Question 6 Comment
		<p><a href="#">weekly conference calls while R4 requires participation in weekly calls.</a></p> <p>Requirement R2 in IRO-001 contains the words “which could include issuing Reliability Directives”, but Reliability Directives are not referenced anywhere else in the standard. This inclusion seems unnecessary since without it, R2 already requires that the RC take actions or direct actions by others to prevent identified events or mitigate the magnitude or duration of actual events that result in Adverse Reliability Impacts. Whether or not a Reliability Directive is issued is irrelevant in this requirement. These words should be removed. Note that COM-002 already stipulates the requirement for 3-part communication when a Reliability Directive is issued. The inclusion of “which could include issuing Reliability Directives” in IRO-001 is unnecessary.</p> <p><b>Response:</b> R2 requires the Reliability Coordinator to act. These actions could include Reliability Directives in the case of an Emergency; however, issuing Reliability Directives might not always be necessary, as the Reliability Coordinator may be acting proactively well in advance of an emergency. R2 promotes this proactive approach, but reserves the use of Reliability Directives for circumstances that require its use.</p>
<p><b>Response:</b> The RCSDT thanks you for your comments.</p>		
PPL		<p>We are providing the following comments for the Standards Drafting Team to consider.</p> <p>1) Consider changing R1 to ‘Each RC shall have the capability for Interpersonal Communications with the following entities to exchange Interconnection and operating information...’ for clarity as Interpersonal Communications and capability are both nouns.</p> <p><b>Response:</b> Thank you for your suggestion to modify the sentence structure into a noun phrase, however the RCSDT believes the current form is unambiguous.</p> <p>2) We feel changing the applicability of the standard is important to the accuracy of the standard. The purpose of COM-002 is ‘To ensure emergency communications between operating personnel are effective’. Since operating personnel are covered by the applicability of RC, BA, TOP and GOP, we suggest the applicability to TSP, LSE, and PSE be removed from COM-002-3.</p> <p><b>Response:</b> We agree and have removed those entities</p> <p>3) Additionally, we would like to bring to the attention of the Standards Drafting Team, that the implementation plan for COM-001-2 and IRO-001-2 still includes TSP, LSE, and PSE although the revised standard does not include these entities in the Applicability Section. For COM-001-2 refer to the implementation plan, page 1. For IRO-001-2 refer to the implementation plan for new R2, new R3, new R4</p>

Organization	Yes or No	Question 6 Comment
		<p>and the chart on the last page. Thank you for your consideration in addressing these comments.</p> <p><b>Response:</b> The RCSDT has revised the applicability of COM-001, COM-002 and IRO-001 to align with each other. TSP, LSE and PSE are no longer in either standard.</p>
<p><b>Response:</b> The RCSDT thanks you for your comments.</p>		
PSEG		<p>IRO COM-002-3 standard continues to include PSE. PSE's do not play an active role and have no authority or ability to perform reliability coordination. PSE's should be removed from the standard.-001-2 references PSE's in the implementation for R2, R3, R4 and "Functions that must comply with the requirements in this standard" table. PSE's were removed from the standard and should be removed from the implementation plan.</p>
<p><b>Response:</b> The RCSDT thanks you for your comments. The RCSDT has revised the applicability of COM-001 and COM-002 to align with each other. TSP, LSE and PSE are no longer in either standard.</p>		
Dominion		<p>We do not agree with the addition of weekly conference calls as required in R4. We believe that RCs should schedule calls as needed but do not agree that a weekly scheduled call improves reliability.</p>
<p><b>Response:</b> The RCSDT thanks you for your comments. The requirement for weekly conference calls exists in IRO-015-1. The RCSDT has revised the requirement and incorporated it into proposed IRO-014-2.</p> <p>R2. The Reliability Coordinator shall participate in agreed upon conference calls and other communication forums with adjacent Reliability Coordinators.</p> <p>R2.1. The frequency of these conference calls shall be agreed upon by all involved Reliability Coordinators and shall be at least weekly.</p>		
SERC OC Standards Review Group		<p>Reliability Directives may be issued by blast calls from Reliability Coordinators. It is inefficient and may be a hindrance to reliability to require 3-part communications in these instances.</p> <p><b>Response:</b> The RCSDT agrees that the use of Blast Calls to issue Reliability Directives, in mass, is efficient and effective. However the essence of accurately implementing Reliability Directives is accomplished by use of 3-part communications. The RCSDT believes Reliability Directives issued in mass should be defined by procedure, and that the procedure would establish a method of affirmation and notice of implementation.</p> <p>There are several organizations registered as BAs, RCs and TOPs. It is not uncommon for those entities to be distributed across multiple desks in the same control room without regard to how an entity is registered.</p>

Organization	Yes or No	Question 6 Comment
		<p>Thus, a single System Operator may perform functions that are categorized under two or more of those functional entities. The drafting team should clarify that under no circumstances should that System Operator be required to issue a Reliability Directive to himself. This is a corporate governance issue.</p> <p><b>Response:</b> COM-002 does not preclude text or other forms of communication for issuing Reliability Directives. However, entities still must comply with the requirements of COM-002. Further, the RCSDT believes it to be equally imperative that each NERC registered function hold the authority to issue Reliability Directives, and the ability to receive Reliability Directives, whether those Reliability Directives are issued to subordinate registered functions within a vertically integrated utility, or to registered entities that are corporately separate. The RCSDT believes the following response to draft 3 comments still holds true:</p> <p style="padding-left: 40px;">“The way that COM-002 is crafted, it focuses on functional entity communication between and among functions. Face-to-face communication of Reliability Directives are subject to the requirements of COM-002 and can be measured for COM-002 by allowing Operator Logs as possible evidence to support compliance”.</p> <p>The use of operator logs to memorialize and provide evidence of compliance is directly specific to those Reliability Directives issued and received within the same control room or operations center. The RCSDT believes that any Registered Entity or person operating as such must understand the intent of the issued Reliability Directive, and that the issuer of the Reliability Directive believe that the Reliability Directive was correctly received. COM-002 should not be construed to mean that an individual serving in two functions be required to issue a Reliability Directive to himself, but rather it is expected that such an individual would appropriately address the reliability issues as required by the function they are serving and its subsequent responsibilities.</p> <p>In IRO-014, R1, delete sub-requirement 1.7. The requirement for weekly conference calls related to operating procedures is duplicative to R4 and could be burdensome while adding very little value under certain circumstances. In IRO-014, R4, delete the phrase “(per Requirement 1, Part 1.7)” as a conforming change.</p> <p><b>Response:</b> The intent of R1 is for Reliability Coordinators to coordinate specific activities with other impacted Reliability Coordinators. These activities are listed as sub requirements. R1.7 requires you to have a procedure relating to weekly conference calls while R4 requires participation in weekly calls. Further, the RCSDT believes that it is prudent that Reliability Coordinators talk at least once a week to verify viability of mutual plans, procedures or processes.</p> <p>In IRO-014, Requirements R6-R8 allow at least the theoretical possibility that an RC may determine an Adverse Reliability Impact in another RC’s area that the other RC neither can see nor believes that any</p>

Organization	Yes or No	Question 6 Comment
		<p>action should be taken. R7 puts the burden on the first RC to develop a plan that it cannot implement because it has no agreement with the BAs and TOPs in the other RC area. As such, this requirement is unenforceable.</p> <p><b>Response:</b> Requirements R6-R8 are translated from IRO-016-1, Requirement R1. If an RC sees a problem and another does not see the same problem, then there may be an issue with someone's model or processes or procedures. The RC's are supposed to have coordinated Operating Plans, Processes or Procedures to operate reliably. R6-R8 are only applicable if one of the two (or more) RCs do not see that a problem exists. It would be a detriment to reliability for both RCs to take no action. RCs are required to coordinate actions under existing IRO-016-1, R1. If one RC identifies a problem and provides an action plan to another RC to mitigate the problem, the second RC is obligated under R8 to implement it. We have revised the R8 to clarify this intent. R8. During those instances where Reliability Coordinators disagree on the existence of an Adverse Reliability Impact, each Reliability Coordinator shall implement the action plan developed by the Reliability Coordinator that identified the Adverse Reliability Impact unless such actions would violate safety, equipment, regulatory or statutory requirements.</p> <p>IRO-014-2, Revised R8. During those instances where Reliability Coordinators disagree on the existence of an Adverse Reliability Impact, each Reliability Coordinator shall implement the action plan developed by the Reliability Coordinator that identified the Adverse Reliability Impact unless such actions would violate safety, equipment, regulatory or statutory requirements.</p> <p>Please review all the implementation plans to be sure the applicable entities match those in the standards.</p> <p><b>Response:</b> These have been updated.</p> <p>"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."</p>
<p><b>Response:</b> The RCSDT thanks you for your comments.</p>		
<p>IRC Standards Review Committee</p>		<p>The SDT did not address all of our concerns with COM-002-3 from the last posting. For entities registered as multiple functions, the combination of the definition of Reliability Directive and Requirement R1 could be confused to require a company to issue directives to itself. There are several organizations registered as a Reliability Coordinator, Transmission Operator and Balancing Authority. In these companies, it is not uncommon for those responsibilities to be distributed across multiple desks. Thus, for certain situations, a single System Operator may actually be the Reliability Coordinator and the Transmission Operator. In other situations, the System Operator serving the Reliability Coordinator function may be adjacent to the System Operator serving the as the Transmission Operator or Balancing Authority. We believe that it should never be necessary for these System Operators to issue Reliability Directives to themselves in the first example or to</p>



Organization	Yes or No	Question 6 Comment
		<p>their co-worker in the second example to demonstrate compliance to NERC standards. How the entity coordinates its actions among its Reliability Coordinator, Balancing Authority and Transmission Operator roles is a corporate governance issue that should not be confused or complicated by the NERC standards. Thus, we believe that standards should be made clear that the Reliability Directive is directed to another company.</p> <p><b>Response:</b> COM-002 does not preclude text or other forms of communication for issuing Reliability Directives. However, entities still must comply with the requirements of COM-002. Further, the RCSDT believes it to be equally imperative that each NERC registered function hold the authority to issue Reliability Directives, and the ability to receive Reliability Directives, whether those Reliability Directives are issued to subordinate registered functions within a vertically integrated utility, or to registered entities that are corporately separate. The RCSDT believes the following response to draft 3 comments still holds true:</p> <p style="padding-left: 40px;">“The way that COM-002 is crafted, it focuses on functional entity communication between and among functions. Face-to-face communication of Reliability Directives are subject to the requirements of COM-002 and can be measured for COM-002 by allowing Operator Logs as possible evidence to support compliance”.</p> <p>The use of operator logs to memorialize and provide evidence of compliance is directly specific to those Reliability Directives issued and received within the same control room or operations center. The RCSDT believes that any Registered Entity or person operating as such must understand the intent of the issued Reliability Directive, and that the issuer of the Reliability Directive believe that the Reliability Directive was correctly received. COM-002 should not be construed to mean that an individual serving in two functions be required to issue a Reliability Directive to himself, but rather it is expected that such an individual would appropriately address the reliability issues as required by the function they are serving and its subsequent responsibilities.</p> <p>We believe that, in place of requiring an operator, in real-time, to state “this is a Reliability Directive,” there should be an allowance for an entity to develop procedures indicating, in advance, their expectations of three-part to their sub-operating entities. Therefore, we suggest modifying R1 to be</p> <p>“When a Reliability Coordinator, Transmission Operator or Balancing Authority requires actions to be executed as a Reliability Directive, the Reliability Coordinator, Transmission Operator or Balancing Authority shall identify the action, either verbally, when the communication is issued, or in advance through documented procedures, as a Reliability Directive to the recipient. [Violation Risk Factor: High][Time Horizon: Real-Time.]”</p> <p><b>Response:</b> In regards to your suggested modification of R1 to include “or in advance through documented</p>

Organization	Yes or No	Question 6 Comment
		<p>procedures”, the intent of R1 in its current form is to provide that ability, as such any documented procedure would require stating such implemented action is considered a response to a Reliability Directive. And would follow acknowledge and confirmation requirements.</p> <p>Also, we believe that the definition of Emergency, as currently cited in these draft Standards and included in the existing NERC Glossary should be modified to include the NERC Glossary term Adverse Reliability Impact to make the Standards more crisp, clear and enforceable. Because the Project 2007-03 Real-Time Operations SDT proposed to utilize the definition of Adverse Reliability Impact in TOP-001-2 R5 during the last posting, the change to the definition should be coordinated with that team.</p> <p><b>Response:</b> The RCSDT believes that the term Emergency relates to the actual state of the system, including local and wide area, while an Adverse Reliability Impact is the impact resulting from an event resulting in instability or cascading that affects a widespread area of an Interconnection. There could be an Emergency that is local, or that threatens equipment but which does not necessarily result in cascading or instability; it is in this regard that the RCSDT believes that the definition of Emergency should not be dependent upon or pertain only to Adverse Reliability Impact events. The RCSDT coordinated the use of Adverse Reliability Impacts with the Real-Time Operations team.</p> <p>There is a text box in IRO-005-4 that indicates this standard will be retired. Yet, there still remain requirements in the standard and various other associated documentation indicates requirements are being move to this standard.</p> <p><b>Response:</b> The text box was removed.</p> <p>Please delete the text box. IRO-014-2 R4 already includes a requirement to have weekly conference calls that should suffice. IRO-014-2 R2 seems to recognize that these Operating Procedures, Processes and Plans likely will not need to be discussed weekly as it only requires an annual update.</p> <p><b>Response:</b> The intent of R1 is for Reliability Coordinators to coordinate specific activities with other impacted Reliability Coordinators, these activities are listed as sub requirements. Further the RCSDT believes that it is prudent that Reliability Coordinators talk at least once a week to verify viability of mutual plans, procedures or processes. The relation of IRO-14-2 R1.7 to R4 is that R1.7 requires having a conference call, R4 requires participation by all impacted Reliability Coordinators, as such, neither replaces the other.</p> <p>In the definition of Reliability Directive, we suggest changing “to address an Emergency” to “to address a reliability constraint or a declared Emergency”. The RCSDT believes that reliability constraint is ambiguous and undefined, thus introducing confusion. Further modifying Reliability Directive by including “declared Emergency” would add unnecessary step in mitigation of the Emergency</p>

Organization	Yes or No	Question 6 Comment
		<p>Further, Requirement R2 in IRO-001 contains the words “which could include issuing Reliability Directives” but Reliability Directives are not referenced anywhere else in the standard. This inclusion seems unnecessary since without it, R2 already requires that the RC take actions or direct actions by others to prevent identified events or mitigate the magnitude or duration of actual events that result in Adverse Reliability Impacts. Whether or not a Reliability Directive is issued is irrelevant in this requirement. We suggest that these words be removed. Note that COM-002 already stipulates the requirement for 3-part communication when a Reliability Directive is issued. The inclusion of “which could include issuing Reliability Directives” in IRO-001 is unnecessary.</p> <p><b>Response:</b> R2 requires the Reliability Coordinator to act, these actions could in include Reliability Directives in the case of an Emergency, however issuing Reliability Directives it might not always be necessary, as the Reliability Coordinator may be acting pro-active well in advance of an emergency. R2 promotes this pro-active approach, but reserves the use of Reliability Directives for circumstances that require its use.</p>
<p><b>Response:</b> The RCSDT thanks you for your comments.</p>		
<p>Midwest ISO Standards Collaborators</p>		<p>The SDT did not address all of our concerns with COM-002-3 from the last posting. For entities registered as multiple functions, the combination of the definition of Reliability Directive and Requirement R1 could be confused to require a company to issue directives to itself. There are several organizations registered as a Reliability Coordinator, Transmission Operator and Balancing Authority. In these companies, it is not uncommon for those responsibilities to be distributed across multiple desks. Thus, for certain situations, a single System Operator may actually be the Reliability Coordinator and the Transmission Operator. In other situations, the System Operator serving the Reliability Coordinator function may be adjacent to the System Operator serving the as the Transmission Operator or Balancing Authority. We believe that it should never be necessary for these System Operators to issue Reliability Directives to themselves in the first example or to their co-worker in the second example to demonstrate compliance to NERC standards. How the entity coordinates its actions among its Reliability Coordinator, Balancing Authority and Transmission Operator roles is a corporate governance issue that should not be confused or complicated by the NERC standards. Thus, we believe that standards should be made clear that the Reliability Directive is directed to another company.</p> <p><b>Response:</b> COM-002 does not preclude text or other forms of communication for issuing Reliability Directives. However, entities still must comply with the requirements of COM-002. Further, the RCSDT believes it to be equally imperative that each NERC registered function hold the authority to issue Reliability Directives, and the ability to receive Reliability Directives, whether those Reliability Directives are issued to subordinate registered functions within a vertically integrated utility, or to registered entities that are corporately separate. The RCSDT believes the following response to draft 3 comments still holds true:</p> <p>“The way that COM-002 is crafted, it focuses on functional entity communication between and among functions. Face-to-face communication of Reliability Directives are subject to the requirements of COM-</p>

Organization	Yes or No	Question 6 Comment
		<p>002 and can be measured for COM-002 by allowing Operator Logs as possible evidence to support compliance”.</p> <p>The use of operator logs to memorialize and provide evidence of compliance is directly specific to those Reliability Directives issued and received within the same control room or operations center. The RCSdT believes that any Registered Entity or person operating as such must understand the intent of the issued Reliability Directive, and that the issuer of the Reliability Directive believe that the Reliability Directive was correctly received. COM-002 should not be construed to mean that an individual serving in two functions be required to issue a Reliability Directive to himself, but rather it is expected that such an individual would appropriately address the reliability issues as required by the function they are serving and its subsequent responsibilities.</p> <p>We also are concerned about the need to conduct three-part communications for a Reliability Directive issued through a blast call. Under these circumstances, the need for immediate action of multiple parties may require a blast call and there may not be time for all parties to complete three-part communications before initiating actions. Thus, we believe blast calls should be treated separately and that should be made clear.</p> <p><b>Response:</b> The RCSdT agrees that the use of Blast Calls to issue Reliability Directives, in mass, is efficient and effective. However the essence of accurately implementing Reliability Directives is accomplished by use of 3-part communications. The RCSdT believes Reliability Directives issued in mass should be defined by procedure, and that the procedure would establish a method of affirmation and notice of implementation.</p> <p>COM-002-3 R2 needs to be rewritten as it is too verbose. The point is for the recipient of the original message to get the issuer to confirm that the message was understood. We suggest rewording R2 to “Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, Transmission Service Provider, Load-Serving Entity, Distribution Provider, and Purchasing-Selling Entity that is the recipient of a Reliability Directive issued per Requirement R1, shall repeat, restate, rephrase or recapitulate the Reliability Directive.” Once the receiver has completed this requirement, the ball is in the issuer’s court per Requirement R3. No additional words are necessary in the requirement.</p> <p><b>Response:</b> The RCSdT believes that the additional verbiage is necessary to ensure that an entity understands the Reliability Directive and is able to communicate that understanding back to the Reliability</p>

Organization	Yes or No	Question 6 Comment
		<p>Coordinator. It is not necessary to repeat the exact same verbiage of the Reliability Directive, but rather the intent of the actions required. Having to repeat verbiage of the Reliability Directive word-for-word could be an impediment to achieving the reliability intent of the Reliability Directive when the focus is on repeating verbatim.</p> <p>Per COM-002-3 R1, who decides that actions need to be issued as a Reliability Directive? Shouldn't it be the responsible entity? Thus, can we assume that if the responsible entity does not identify a communication as a Reliability Directive that it is not a Reliability Directive per the requirement? After all, why would an entity require actions but not issue a Reliability Directive. Following this logic, the VSL for R1 would never apply. Would a compliance auditor second guess if an action required a Reliability Directive?</p> <p><b>Response:</b> Those orders issued as a Reliability Directive, and identified as such, will heighten awareness, tighten communications and require the receiver of the Reliability Directive to prioritize its response. Moreover, linking Reliability Directives to Emergencies establishes that normal non-Emergency operating communications or actions are not applicable to COM-002.</p> <p>Because the Project 2007-03 Real-Time Operations SDT proposed to utilize the definition of Adverse Reliability Impact in TOP-001-2 R5 during the last posting, the change to the definition should be coordinated with that team.</p> <p><b>Response:</b> The RCSDT coordinated the use of Adverse Reliability Impacts with the Real-Time Operations team</p> <p>There is a text box in IRO-005-4 that indicates this standard will be retired. Yet, there still remain requirements in the standard and various other associated documentation indicates requirements are being move to this standard. Please delete the text box.</p> <p><b>Response:</b> The text box has been removed.</p> <p>Please strike part IRO-014-2 Part 1.7. There is no need to have a weekly conference to discuss every Operating Procedure, Operating Process and Operating Plan. As this requirement is written, a conference call would be necessary for each. Furthermore, IRO-014-2 R4 already includes a requirement to have weekly conference calls that should suffice. IRO-014-2 R2 seems to recognize that these Operating Procedures, Processes and Plans likely will not need to be discussed weekly as it only requires an annual update.</p> <p><b>Response:</b> The intent of R1 is for Reliability Coordinators to coordinate specific activities with other impacted</p>

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		<p>Reliability Coordinators, these activities are listed as sub requirements. R1.7 is requires you to have a procedure relating to weekly conference calls while R4 requires participation in weekly calls. Further the RCSDT believes that it is prudent that Reliability Coordinators talk at least once a week to verify viability of mutual plans, procedures or processes.</p> <p>IRO-014-2 R4 is overly broad and would require Reliability Coordinators that will not impact one another to participate on conference calls with one another without any reliability benefit. The issue is created by the addition of the clause “within the same Interconnection” to the requirement. ISO-NE, FRCC, Midwest ISO, and SPP are all in the same Interconnection. It is hard to fathom there being reliability benefit to SPP and ISO-NE conversing weekly or Midwest ISO and FRCC conversing weekly. We suggest limiting the requirement to adjacent Reliability Coordinators.</p> <p><b>Response:</b> IRO-14-2 R4 is applicable to those Reliability Coordinators engaged in activities related to R1 and subsequently R1.7, it is unlikely that Reliability Coordinators whom are geographically and electrically distant will have <i>mutually agreed upon</i> operating procedures (per R1), and as such they are not applicable to R4.</p> <p>For IRO-014-2 R5, we suggest replacing “other” with “impacted” to limit the notification of Adverse Reliability Impacts to only those Reliability Coordinators that need to know. Because the definition of Adverse Reliability Impact includes “Bulk Electric System instability or Cascading”, it is possible that the cascading of 138 kV lines serving a load pocket or generator outlet stability issues could require a Reliability Coordinator to notify all other Reliability Coordinators regardless of impact. This would include Reliability Coordinators outside of the Interconnection with the problem. It would also include Reliability Coordinators that are not impacted. For instance, an issue in New England that would not pose a threat outside the northeast would require ISO-NE to notify SPP and FRCC and Reliability Coordinators in the Western Interconnection. There is no reliability benefit to this notification.</p> <p><b>Response:</b> This requirement continues the current practice of informing all RCs of ARIs. Due to the nature of an ARI, this requirement is typically implemented as an RCIS message or a hotline call to all RC’s. This is intended to make all RCs aware of ARIs and support situational awareness.</p> <p>IRO-014-2 R6-R8 are problematic and need to be refined to make clear that the Reliability Coordinators shall operate to the most conservative limit. It should not require a Reliability Coordinator that disagrees with an action plan to implement the action plan. The Reliability Coordinator will be disagreeing with the action plan for reliability reasons. Assuming they are correct, the requirement to implement said action plan will actually put the Interconnection at greater risk. These requirements inappropriately attempt to codify the debate and analysis that occurs between and within Reliability Coordinators when there are differing results in reliability</p>

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		<p>analysis. This is part of the problem with having a Wide Area view that results in Reliability Coordinators having a view into other Reliability Coordinator Areas. Their results and conclusions may be different. There should be a hierarchical structure for whose results should be used. It should be the Reliability Coordinator with primary responsibility unless the other Reliability Coordinator has evidence to demonstrate that the Reliability Coordinator with primary responsibility is incorrect. What this should do is to trigger both to review their models and data to assess the problem. None of this needs to be codified in the standards though.</p> <p><b>Response:</b> Requirements R6-R8 are translated from IRO-016-1, Requirement R1. If an RC sees a problem and another does not see the same problem, then there may be an issue with someone's model or processes or procedures. The RC's are supposed to have coordinated Operating Plans, Processes or Procedures to operate reliably. R6-R8 are only applicable if one of the two (or more) RCs do not see that a problem exists. It would be a detriment to reliability for both RCs to take no action. RCs are required to coordinate actions under existing IRO-016-1, R1. If one RC identifies a problem and provides an action plan to another RC to mitigate the problem, the second RC is obligated under R8 to implement it. We have revised the R8 to clarify this intent.</p> <p>In the definition of Reliability Directive, we suggest changing "to address an Emergency" to "to address a declared Emergency". This would help limit second guessing for a situation where a System Operator took action because he truly believed he was an Emergency but after the fact analysis demonstrates there really was not an Emergency.</p> <p><b>Response:</b> Modifying Reliability Directive by including "declared Emergency" would add an unnecessary step in mitigation of the Emergency. The act of issuing a Reliability Directive to address an Emergency (per the proposed definition) is sufficient.</p> <p>The drafting team should expand its rationale for deleting IRO-002-1 R3. Currently, TOP-005 R1 is referenced. The Real-Time Operations drafting team proposed to retire TOP-005-2 R1 in its most recent posting.</p> <p><b>Response:</b> The data provisions are covered in recently approved IRO-010-1, R1-R3 which replaced TOP-005-1, R1. The secure network provisions are covered in the CIP body of standards.</p> <p>We disagree with deleting IRO-002-1 R5 and R7 which establish tools and monitoring capabilities. There should be basic tools requirements established for Reliability Coordinators. Project 2009-02 Real-time Reliability Monitoring and Analysis Capabilities will be addressing these issues in more detail. Thus, it does not make sense to delete these requirements until that drafting team completes its task.</p> <p><b>Response:</b> Each RC has been certified to continue operations as an RC or been certified prior to beginning operations as an RC. The minimum set of tools and capabilities for an RC are "checked off" during the certification process. The reliability objective of R5 and R7 is to perform analyses to ensure reliability of the</p>

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		<p>BES by specifying capability rather than mandating specific tools. The analysis provisions of R5 and R7 are covered under IRO-008-1, Requirements R1 (perform Operational Planning Analysis) and R2 (perform Real-time Analysis). It is anticipated that Project 2009-02 team will address this issue more fully.</p>
<p>MRO's NERC Standards Review Subcommittee</p>		<p>A. COM-002-3, R2 As stated in FERC Order 693, section 512, it is essential that RCs, BA's and TOP's have communications with DPs. R2 also applies to TSPs, LSEs and PSEs. There is no directive for this and it is going to be almost impossible to communicate with a DP since DPs are usually not operated 24 hours per day as like a RC, TOP, or BA. Many DPs have answering services that will relay a message once they receive it and then pass it along to someone. An answering company could repeat the directive word for word but this will not add to any reliability level. The SDT should reconsider the applicability section of this Standard to only apply to a RC, TOP and BA for the issuance of a Reliability Directive. BA's should have the responsibility to have an Interpersonal Communication medium with DPs in their BA area per COM-001-2.</p> <p><b>Response:</b> The purpose of COM-002 is "To ensure emergency communications between operating personnel are effective." It is not a proxy requirement to establish 24/7 operating personnel at small distribution providers. The intent is to establish a <u>method</u> of communicating Reliability Directives during Emergencies. While it is true that many small Distribution Providers are not staffed 24x7, it is typical that they have a means of communication, in many cases this may be via a receptionist, or answering service. It is the expectation that an issuer of a Reliability Directive would request a return call by the Distribution Provider operating personnel, then issue the Reliability Directive. If this return call would not be timely enough, then the issuer would determine a different mitigation plan.</p> <p>B. IRO-002-2, R1, Recommend that "System Operators" be replaced with "system operators" since NERC has defined System Operator to be an individual at a control center (BA, TOP, GOP, or RC). The lower cased system operator will only point to the RC system operator that will have this R1 authority.</p> <p><b>Response:</b> IRO-002-2 is applicable only to Reliability Coordinators, as such the using System Operator as it defined by the NERC Glossary of terms is appropriate.</p> <p>C. The SDT did not address all of our concerns with COM-002-3 from the last posting. For entities registered as multiple functions, the combination of the definition of Reliability Directive and Requirement R1 could be confused to require a company to issue directives to itself. There are several organizations registered as a Reliability Coordinator, Transmission Operator and Balancing Authority. In these companies, it is not uncommon for those responsibilities to be distributed across multiple desks. Thus, for certain situations, a single System Operator may actually be the Reliability Coordinator and the Transmission Operator. In other situations, the System Operator serving the Reliability Coordinator function may be adjacent to the System Operator serving the as the Transmission Operator or Balancing Authority. We believe that it should never be necessary for these System Operators to issue Reliability Directives to themselves in the first example or to their co-worker in the second example to demonstrate compliance to NERC standards. How the entity</p>



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		<p>coordinates its actions among its Reliability Coordinator, Balancing Authority and Transmission Operator roles is a corporate governance issue that should not be confused or complicated by the NERC standards. Thus, we believe that standards should be made clear that the Reliability Directive is directed to another company.</p> <p><b>Response:</b> COM-002 does not preclude text or other forms of communication for issuing Reliability Directives. However, entities still must comply with the requirements of COM-002. Further, the RCSDT believes it to be equally imperative that each NERC registered function hold the authority to issue Reliability Directives, and the ability to receive Reliability Directives, whether those Reliability Directives are issued to subordinate registered functions within a vertically integrated utility, or to registered entities that are corporately separate. The RCSDT believes the following response to draft 3 comments still holds true:</p> <p style="padding-left: 40px;">“The way that COM-002 is crafted, it focuses on functional entity communication between and among functions. Face-to-face communication of Reliability Directives are subject to the requirements of COM-002 and can be measured for COM-002 by allowing Operator Logs as possible evidence to support compliance”.</p> <p>The use of operator logs to memorialize and provide evidence of compliance is directly specific to those Reliability Directives issued and received within the same control room or operations center. The RCSDT believes that any Registered Entity or person operating as such must understand the intent of the issued Reliability Directive, and that the issuer of the Reliability Directive believe that the Reliability Directive was correctly received. COM-002 should not be construed to mean that an individual serving in two functions be required to issue a Reliability Directive to himself, but rather it is expected that such an individual would appropriately address the reliability issues as required by the function they are serving and its subsequent responsibilities.</p> <p>D. We also are concerned about the need to conduct three-part communications for a Reliability Directive issued through a blast call. Under these circumstances, the need for immediate action of multiple parties may require a blast call and there may not be time for all parties to complete three-part communications before initiating actions. Thus, we believe blast calls should be treated separately and that should be made clear.</p> <p><b>Response:</b> The RCSDT agrees that the use of Blast Calls to issue Reliability Directives, in mass, is efficient and effective. The RCSDT believes Reliability Directives issued in mass should be defined by procedure, and that the procedure would establish a method of affirmation and notice of implementation.</p> <p>E. COM-002-3 R2 needs to be rewritten as it is too verbose. The point is for the recipient of the original message to get the issuer to confirm that the message was understood. We suggest rewording R2 to</p> <p>“Each Reliability Coordinator, Balancing Authority, Transmission Operator, Generator Operator, Transmission Service Provider, Load-Serving Entity, Distribution Provider, and Purchasing-Selling Entity that is the recipient</p>

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		<p>of a Reliability Directive issued per Requirement R1, shall repeat, restate, rephrase or recapitulate the Reliability Directive.”</p> <p>Once the receiver has completed this requirement, the ball is in the issuer’s court per Requirement R3. No additional words are necessary in the requirement.</p> <p><b>Response:</b> The RCSDT believes that the additional verbiage is necessary to ensure that an entity understands the Reliability Directive and is able to communicate that understanding back to the Reliability Coordinator. It is not necessary to repeat the exact same verbiage of the Reliability Directive, but rather the intent of the actions required. Having to repeat verbiage of the Reliability Directive word-for-word could be an impediment to achieving the reliability intent of the Reliability Directive when the focus is on repeating verbatim.</p> <p>F. Per COM-002-3 R1, who decides that actions need to be issued as a Reliability Directive? Shouldn’t it be the responsible entity? Thus, can we assume that if the responsible entity does not identify a communication as a Reliability Directive that it is not a Reliability Directive per the requirement? After all, why would an entity require actions but not issue a Reliability Directive. Following this logic, the VSL for R1 would never apply. Would a compliance auditor second guess if an action required a Reliability Directive?</p> <p><b>Response:</b> Those orders issued as a Reliability Directive, and identified as such, will heighten awareness, tighten communications and require the receiver of the Reliability Directive to prioritize its response. Moreover, linking Reliability Directives to Emergencies establishes that normal non-Emergency operating communications or actions are not applicable to COM-002.</p> <p>G. Because the Project 2007-03 (“Real-Time Operations SDT”) proposed to utilize the definition of Adverse Reliability Impact in TOP-001-2 R5 during the last posting, the change to the definition should be coordinated with that team.</p> <p><b>Response:</b> The RCSDT coordinated the use of Adverse Reliability Impacts with the Real-Time Operations team</p> <p>H. There is a text box in IRO-005-4 that indicates this standard will be retired. Yet, there still remain requirements in the standard and various other associated documentation indicates requirements are being move to this standard. Please delete the text box.</p> <p><b>Response:</b> The text box has been removed.</p> <p>I. Please strike part IRO-014-2 Part 1.7. There is no need to have a weekly conference to discuss every Operating Procedure, Operating Process and Operating Plan. As this requirement is written, a conference call would be necessary for each. Furthermore, IRO-014-2 R4 already includes a requirement to have weekly conference calls that should suffice. IRO-014-2 R2 seems to recognize that these Operating Procedures,</p>

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		<p>Processes and Plans likely will not need to be discussed weekly as it only requires an annual update.</p> <p><b>Response:</b> The intent of R1 is for Reliability Coordinators to coordinate specific activities with other impacted Reliability Coordinators, these activities are listed as sub requirements. R1.7 is requires you to have a procedure relating to weekly conference calls while R4 requires participation in weekly calls. Further the RCSDT believes that it is prudent that Reliability Coordinators talk at least once a week to verify viability of mutual plans, procedures or processes.</p> <p>J. IRO-014-2 R4 is overly broad and would require Reliability Coordinators that will not impact one another to participate on conference calls with one another without any reliability benefit. The issue is created by the addition of the clause “within the same Interconnection” to the requirement. ISO-NE, FRCC, Midwest ISO, and SPP are all in the same Interconnection. It is hard to fathom there being reliability benefit to SPP and ISO-NE conversing weekly or Midwest ISO and FRCC conversing weekly. We suggest limiting the requirement to adjacent Reliability Coordinators.</p> <p><b>Response:</b> IRO-14-2 R4 is applicable to those Reliability Coordinators engaged in activities related to R1 and subsequently R1.7, it is unlikely that Reliability Coordinators whom are geographically and electrically distant will have <i>mutually agreed upon operating procedures</i> (per R1), and as such they are not applicable to R4.</p> <p>K. For IRO-014-2 R5, we suggest replacing “other” with “impacted” to limit the notification of Adverse Reliability Impacts to only those Reliability Coordinators that need to know. Because the definition of Adverse Reliability Impact includes “Bulk Electric System instability or Cascading”, it is possible that the cascading of 138 kV lines serving a load pocket or generator outlet stability issues could require a Reliability Coordinator to notify all other Reliability Coordinators regardless of impact. This would include Reliability Coordinators outside of the Interconnection with the problem. It would also include Reliability Coordinators that are not impacted. For instance, an issue in New England that would not pose a threat outside the northeast would require ISO-NE to notify SPP and FRCC and Reliability Coordinators in the Western Interconnection. There is no reliability benefit to this notification.</p> <p><b>Response:</b> This requirement continues the current practice of informing all RCs of ARIs. Due to the nature of an ARI, this requirement is typically implemented as an RCIS message or a hotline call to all RC’s. This is intended to make all RCs aware of ARIs and support situational awareness.</p> <p>L. IRO-014-2 R6-R8 are problematic and need to be refined to make clear that the Reliability Coordinators shall operate to the most conservative limit. It should not require a Reliability Coordinator that disagrees with an action plan to implement the action plan. The Reliability Coordinator will be disagreeing with the action plan for a reliability reasons. Assuming they are correct, the requirement to implement said action plan will actually put the Interconnection at greater risk. These requirements inappropriately attempt to codify the debate and analysis that occurs between and within Reliability Coordinators when there are differing results in reliability analysis. This is part of the problem with having a Wide Area view that results in Reliability Coordinators</p>

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		<p>having a view into other Reliability Coordinator Area. Their results and conclusions may be different. There should be a hierarchical structure for whose results should be used. It should be the Reliability Coordinator with primary responsibility unless the other Reliability Coordinator has evidence to demonstrate that the Reliability Coordinator with primary responsibility is incorrect. What this should do is, to trigger both to review their models and data to assess the problem. None of this needs to be codified in the standards though.</p> <p><b>Response:</b> Requirements R6-R8 are translated from IRO-016-1, Requirement R1. If an RC sees a problem and another does not see the same problem, then there may be an issue with someone’s model or processes or procedures. The RC’s are supposed to have coordinated Operating Plans, Processes or Procedures to operate reliably. R6-R8 are only applicable if one of the two (or more) RCs do not see that a problem exists. It would be a detriment to reliability for both RCs to take no action. RCs are required to coordinate actions under existing IRO-016-1, R1. If one RC identifies a problem and provides an action plan to another RC to mitigate the problem, the second RC is obligated under R8 to implement it. We have revised the R8 to clarify this intent.</p> <p>M. In the definition of Reliability Directive, we suggest changing “to address an Emergency” to “to address a declared Emergency”. This would help limit second guessing for a situation where a System Operator took action because he truly believed he was in an Emergency but after the fact analysis demonstrates there really was not an Emergency.</p> <p><b>Response:</b> Modifying Reliability Directive by including “declared Emergency” would add an unnecessary step in mitigation of the Emergency. The act of issuing a Reliability Directive to address an Emergency (per the proposed definition) is sufficient.</p> <p>N. The drafting team should expand its rationale for deleting IRO-002-1 R3. Currently, TOP-005 R1 is referenced. The project 2007-03 (“Real-Time Operations SDT”) proposed to retire TOP-005-2 R1 in its most recent posting.</p> <p><b>Response:</b> The data provisions are covered in recently approved IRO-010-1, R1-R3 which replaced TOP-005-1, R1. The secure network provisions are covered in the CIP body of standards.</p> <p>O. We disagree with deleting IRO-002-1 R5 and R7 which establishes tools and monitoring capabilities. There should be basic tool requirements established for Reliability Coordinators. The project 2009-02 (“Real-time Reliability Monitoring and Analysis Capabilities”) will be addressing these issues in more detail. Thus, it does not make sense to delete these requirements until that drafting team completes its task.</p> <p><b>Response:</b> Each RC has been certified to continue operations as an RC or been certified prior to beginning</p>

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		<p>operations as an RC. The minimum set of tools and capabilities for an RC are “checked off” during the certification process. The reliability objective of R5 and R7 is to perform analyses to ensure reliability of the BES by specifying capability rather than mandating specific tools. The analysis provisions of R5 and R7 are covered under IRO-008-1, Requirements R1 (perform Operational Planning Analysis) and R2 (perform Real-time Analysis). It is anticipated that Project 2009-02 team will address this issue more fully.</p>
<p><b>Response:</b> The RCSDT thanks you for your comments.</p>		
FirstEnergy		<p>FirstEnergy offers the following additional comments:</p> <ol style="list-style-type: none"> <li data-bbox="709 521 1965 703">1. The effective dates of the standards indicate an effective date of the first day of the first calendar quarter following regulatory approval. The changes to these standards will require changes to existing compliance evidence, as well as the creation of compliance evidence for some entities such as the Generator Operator which is a new applicable entity in COM-001. Therefore, to give entities ample time to get their compliance evidence in place, we suggest the effective state “the first day of the second quarter after regulatory approval”.</li> </ol> <p><b>Response:</b> The RCSDT agrees and will change the implementation plan to reflect the “first day of the second quarter after regulatory approval.”</p> <ol style="list-style-type: none"> <li data-bbox="709 846 1965 995">3. With regard to the requirements for Alternative Interpersonal Communications, we question why the Generator Operator or Distribution Provider is not required to have backup communication. It would be difficult for a Reliability Coordinator, for instance, to contact a Generator Operator whose primary communications have been disabled if that entity does not have a backup. We suggest that the drafting team consider adding the GOP and DP as applicable entities requiring alternative communications.</li> </ol> <p><b>Response:</b> The RCSDT asserts the standard meets FERC Order 693 regarding DP and GOP entities by requiring these entities to have Interpersonal Communication capability. Not requiring DP and GOP entities to have Alternative Interpersonal Communication capability meets FERC’s intention as stated here: “We (FERC) clarify that the NOPR did not propose to require redundancy on generator operators’ or distribution providers’ telecommunication facilities...” (Order 693, RM06-16-000, Paragraph 487).</p>
<p><b>Response:</b> The RCSDT thanks you for your comments.</p>		
SPP Standards Development		<p>IRO-001-2, R2 implies that the RC could interrupt the normal chain of command from the TOP and/or BA to their respective GOPs, ICs and DPs thereby circumventing the coordinating process that currently exists. In fact, these entities may not even know their RCs nor be able to identify them and as such any directive from</p>

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		<p>the RC may not be implemented in a timely manner. We would like to see a qualifier on this requirement that does not remove the normal coordination role from the TOP with his DP, etc.</p> <p><b>Response:</b> There may be unusual circumstances whereby the requirement may indeed circumvent the normal coordinating process in the interest of time / reliability. The RC has the ultimate authority with respect to BES reliability.</p> <p>We would suggest that "with enough details that the accuracy of the message has been confirmed" be deleted from COM-002-3, R2.</p> <p><b>Response:</b> The RCSDT believes that the additional verbiage is necessary to ensure that an entity understands the Reliability Directive and is able to communicate that understanding back to the Reliability Coordinator. It is not necessary to repeat the exact same verbiage of the Reliability Directive, but rather the intent of the actions required. Having to repeat verbiage of the Reliability Directive word-for-word could be an impediment to achieving the reliability intent of the Reliability Directive when the focus is on repeating verbatim.</p> <p>We would suggest the use of the term 'instruction" and its derivatives rather than 'direct' in IRO-001-2, R2, R3 and R4.</p> <p><b>Response:</b> This proposed change is stylistic in nature. Stakeholder consensus indicates that this is not an issue for the overwhelming majority of commenters.</p> <p>Delete 'issue an alert to' in IRO-005-4, R1. There are yellow boxes in IRO-005-4, redline versions, which indicate that this standard is being retired, but it isn't because two requirements from IRO-001 are being returned to this standard.</p> <p><b>Response:</b> These are typos and have been corrected as noted.</p>
<p><b>Response:</b> The RCSDT thanks you for your comments.</p>		
Kansas City Power & Light		<p>There are more requirements that are being removed in the IRO standards than are currently proposed. It would be helpful if the SDT would consider a mapping of each requirement that is being eliminated and whether the requirement is duplicated elsewhere, moved elsewhere and where, or is deemed not needed would be helpful in judging if the changes are appropriate. Without this mapping it is difficult to fully support all the proposed changes to all these Standards.</p>

Organization	Yes or No	Question 6 Comment
<p><b>Response:</b> The RCSDT thanks you for your comments. The implementation plan contains the requested mapping.</p>		
<p>Competitive Suppliers</p>		<p>EPSA is the trade association for competitive suppliers including both generators and marketers that represent over 700 entities in the NERC compliance registry. As such, the EPSA membership includes members registered as Purchasing Selling Entities (PSE) in each NERC region. Moreover, many of EPSA's members are also registered as LSEs in several regions. In general, EPSA supports the progress made in revising COM-001, COM-002 and IRO-001 in Project 2006-06, particularly the improvements made to the definition of Reliability Directive.</p> <p>However, EPSA also has concerns with some proposed changes to the applicability sections of the revised standards. In addition, EPSA requests that the implementation plans be changed so that they are consistent with the standard.</p> <p>Regarding applicability, EPSA agrees that COM-001 should continue to not apply to Purchasing Selling Entity (PSE) and Load Serving Entity (LSE) functions.</p> <p>However, the implementation plan for COM-001-2 still includes a reference that PSEs and LSEs must comply (page 11 of the implementation plan). Additionally, EPSA supports the removal of LSEs and PSEs from IRO-001-2. Much like the situation with COM-001-2, the implementation plan for IRO-001-2 still includes a reference that LSEs and PSEs must comply (page 11 of the implementation plan). In both the implementation plans for COM-001-2 and IRO-001-2 these references should be removed. For reasons similar to those underlying why COM-001-2 and IRO-001-2 do not apply to PSEs and LSEs, EPSA opposes the addition of PSEs to the COM-002-3 applicability. The purpose of the emergency communications in these standards is "To ensure emergency communications between operating personnel are effective." The removal would recognize that PSEs and LSEs do not play an active role in reliability coordination under this standard since they have no authority, nor ability to assume or perform responsibilities associated with reliability coordination. When a RC, TOP, or BA needs to address an Emergency they do not contact, consult, or direct a PSE to take action to address the Emergency. Reliability is neither improved nor degraded by having these Standards applicable to PSEs or LSEs; therefore, COM-001, COM-002 and IRO-001 need not be applicable to PSEs or LSEs. Thanks to the drafting team members for their effort on revising the Project 2006-06 standards.</p>
<p><b>Response:</b> The RCSDT thanks you for your comments.</p> <p>The RCSDT has removed the PSE and LSE from the COM-001-2 and IRO-001-2 implementation plans.</p> <p>For COM-002, the RCSDT believes that all registered NERC entities engaged in daily operational activities must adhere to requirements related to Reliability</p>		

Organization	Yes or No	Question 6 Comment
<p>Directives. While LSE and PSE's are not engaged in coordination activities, they are engaged in load serving, as well as purchasing and selling activities on a daily basis. These activities could be subject to Reliability Directives, either in the form of load reduction, or schedule curtailments.</p>		
<p>Exelon</p>		<ol style="list-style-type: none"> <li data-bbox="709 334 1976 496"> <p>1. COM-002-2, R2 - Remove the word "recapitulate", feel that "restate or rephrase" is adequate. The word "recapitulate" is not commonly used and is somewhat obscure.</p> <p><b>Response:</b> The proposed changes are stylistic in nature. The RCSDT included the phrase including "recapitulate" at the suggestion of another stakeholder, and has decided to leave the phrase "restate, rephrase, or recapitulate" intact as suggested by the other stakeholder.</p> </li> <li data-bbox="709 513 1934 683"> <p>2. COM-002-2, R3 - Suggest using the words "repeat back" rather than "state or respond that" to more clearly identify the expectation with more commonly used language.</p> <p><b>Response:</b> The proposed changes are stylistic in nature. The RCSDT included the phrase including "recapitulate" at the suggestion of another stakeholder, and has decided to leave the phrase "restate, rephrase, or recapitulate" intact as suggested by the other stakeholder.</p> </li> <li data-bbox="709 699 1976 1170"> <p>3. IRO-001-2, R3 - While we appreciate that the SDT has defined the term "directive" as a much needed definition, IRC-001-2 R.3 now introduces a new term "direction", what is a "direction" and how does it differ from "directive"? If a new term is going to be introduced it needs to be defined, if the intent was to use the word "directive" then "direction" should be replaced with "directive."</p> <p><b>Response:</b> The requirement language specifically ties back to Requirement R2 which states that the RC "shall take actions or direct actions, which could include issuing Reliability Directives, ". This is the "direction in accordance with Requirement R2" stated in R3 and the "direction in accordance with Requirement R3" stated in R4.</p> <p>3. IRO-001-2, R4 - Again the term "as directed" is confusing, recommend that the text be changed to align with the term directive, "unable to perform the directive per Requirement R3."</p> <p><b>Response:</b> The requirement language specifically ties back to Requirement R2 which states that the RC "shall take actions or direct actions, which could include issuing Reliability Directives, ". This is the "direction in accordance with Requirement R2" stated in R3 and the "direction in accordance with Requirement R3" stated in R4.</p> </li> </ol>
<p><b>Response:</b> The RCSDT thanks you for your comments.</p>		
<p>PacifiCorp</p>		



Organization	Yes or No	Question 6 Comment
Arizona Public Service Company		
LG&E and KU Energy		<p>1) LG&amp;E/KU suggests that the definitions and related Reliability Standards be edited to provide a clearer understanding of what is required. When used in the requirements of COM-001, the proposed definitions for Interpersonal Communication and Alternative Interpersonal Communication read improperly (i.e., a “medium capability”). This may cause confusion as to what is required by the Applicable entities. Any further use of these terms may cause greater confusion. Suggested Alternative: Interpersonal Communication: Any instance where two or more individuals interact, consult, or exchange information. The definition of “Alternative Interpersonal Communication” would not have to be changed since it is dependent upon the definition of “Interpersonal Communication.”The change of the definitions of Interpersonal Communication and Alternative Interpersonal Communication shifts their focus to the communication itself-the event. This makes the Requirements themselves much clearer since the Requirements focus on the need that entities have the capabilities-the medium. It appears the SDT’s intent is to ensure that the event takes place by requiring that the medium for those events are in place. This is much clearer if there is a distinction between the two (the event and the medium) than if they have similar definitions (a medium and a “medium capability”).</p> <p><b>Response:</b> The RCSDT chose to use “medium” so as to not preclude the use of text, voice, electronic or other technology. The intent of the definition as well as the requirements is to require that functional entities have a means to communicate.</p> <p>2) LG&amp;E/KU question the consistency of the Applicability sections as they pertain to the TSP, LSE and PSE functions between COM-001 and COM-002. The deletion of the TSP, LSE and PSE from COM-001 is supported, but if these entities are not required to establish Interpersonal Communication (or Alternative Interpersonal Communication) capability with reliability entities (RC, BA, TOP), should they still be required to follow the reliability directive process of COM-002? If the probability of issuing a Reliability Directive to a TSP, LSE or PSE is so low that Interpersonal Communications capabilities with reliability entities is not justified under COM-001, why are the TSP, LSE and PSE still held to the</p> <p>3 way communication requirements of COM-002? Suggest the Applicability of COM-002 to TSP, LSE and PSE and associated requirements be deleted.</p> <p><b>Response:</b> The RCSDT has revised the applicability of COM-001 and COM-002 such that they contain the same functional entities. These are: RC, TOP, BA, GOP, and DP.</p>
<p><b>Response:</b> The RCSDT thanks you for your comments.</p>		

Consideration of Comments on Reliability Coordination — Project 2006-06

Organization	Yes or No	Question 6 Comment
Southern Company		<p>Comments: It appears that the requirements for entities designated in the IRO standards to have tools to access and/or monitor the system have been moved to pending standards that are not enforceable. It seems that if the newest revisions of the IRO standards are not implemented as a group there will be either missing requirements or duplicate requirements in the IRO standards.</p>
<p><b>Response:</b> The RCSDT thanks you for your comments. The implementation plans note prerequisite approvals that must occur prior to retiring requirements. FERC recently approved IRO-008, 009 and 010. The standards under this project will be filed together with FERC.</p>		
Green Country Energy, Green Country Operating Services		<p>IRO-001-2 as proposed does not include the PSE in the applicability, nor does it require the PSE to respond to a directive. However, COM-002 requires them to repeat the directive back... If the directive is that important to repeat back should they not have to act upon the directive? I think the PSE should be included in IRO-001-2 this standard as they represent and direct generation facility deployment in many cases. Including the PSE in COM-001 may be a good idea too, just for the situations listed above.</p>
<p><b>Response:</b> The RCSDT thanks you for your comments. The RCSDT has revised the applicability of COM-001 and COM-002 such that they contain the same functional entities. These are: RC, TOP, BA, GOP, and DP.</p>		
Central Lincoln		<p>The stated purpose of COM-002 is:</p> <p>“To ensure emergency communications between operating personnel are effective.” As written, the standard fails to meet this purpose because the three requirements only deal with communications at the entity level. There is no requirement for the directing entity to even try to reach operating personnel at the receiving entity. The directing entity may follow all the requirements of this standard by following R1 and R3 with the receiving entity’s receptionist, answering service, janitor, night watchman, etc. The receiving entity only needs to meet R2, parroting the directive. Again this could be accomplished by anyone with no assurance the directive reaches the operating personnel who can implement it. When we stated a similar objection during the last comment period, The SDT’s answer suggested this was a PER staffing issue, but none of the PER requirements even apply to DP/LSE directive recipients. We suggest the entity issuing the directive should be required to make an attempt to get it to those who are competent to understand and implement the directive. This is not a staffing, training, or credentials issue; it is a performance issue that falls squarely within the stated purpose of this standard.</p> <p>COM-001 R10 presents a paradoxical situation to an entity attempting to comply. Consider an interpersonal communication capability failure that lasts longer than 60 minutes past initial detection. At or before 60 minutes, the affected entity is expected to notify impacted entities. If it has no interpersonal communication capability, how shall it make this notification? And if the entity does manage to make such a notification, it has thereby proven that it does have interpersonal communication capability making such notification</p>

Organization	Yes or No	Question 6 Comment
		<p>unnecessary.</p> <p><b>Response:</b> The DP or GOP has access to additional Interpersonal Communications, in all likelihood, to make notifications for failure. There is not a requirement for an alternative, but it is highly unlikely that someone couldn't use their cell phone to make the notification.</p> <p>We again ask the SDT to consider that not all the entities in the applicability sections of COM-001 and 002 have 24/7 dispatch centers. These are typically smaller entities that were required to register because they exceed 25 MW or were asked in the past to voluntarily provide UFLS. They do not and do not need to continuously communicate with TOPs, BAs, RCs, etc; and a "reliability directive" is a theoretical thing that has never happened during the memories of thirty year employees. The directive issuing entities simply realize the limitations around the receiving entities and work around them. The financial burden on these small entities and their customers to go to 24/7 dispatch will not have a corresponding reliability benefit. And while the two COM standards do not explicitly state that entities must maintain 24/7 dispatch, when all the requirements and definitions and time horizons are taken together 24/7 continuous competent communication is implied. During the last comment period, the SDT suggested this was a registration issue beyond their control. We submit instead that this is a standard applicability question that the SDT does have control over, since it is right there in Section A.4 of the two COM standards. While we appreciate that the SDT is responding to FERC order 693 to include DPs, we note that FERC also stated: Paragraph 487: "We expect the telecommunication requirements for all applicable entities will vary according to their roles and that these requirements will be developed under the Reliability Standards development process." Paragraph 6: "A Reliability Standard may take into account the size of the entity that must comply and the costs of implementation" Paragraph 141: "...the Commission clarifies that it did not intend to ... impose new organizational structures..." Paragraph 31: "We emphasize that we are not, at this time, mandating a particular outcome by way of these directives, but we do expect the ERO to respond with an equivalent alternative and adequate support that fully explains how the alternative produces a result that is as effective as or more effective than the Commission's example or directive. We ask the SDT to exclude DPs, LSEs, and PSEs that do not have 24/7 dispatch centers from the applicability of these two standards in order to meet FERC order 693.</p>
<p><b>Response:</b> The RCSDT thanks you for your comments. There is no requirement for 24/7 support - the requirement is to have communications capability. The type of system (e.g., On-Call) is not prescribed in the standard and the standard is designed not to impose needless communications requirements. The purpose of COM-002 is "To ensure emergency communications between operating personnel are <u>effective</u>." It is not a proxy requirement to establish 24/7 operating personnel at small distribution providers. The intent is to establish a <u>method</u> of communicating Reliability Directives during Emergencies. While it is true that many small Distribution Providers are not staffed 24x7, it is typical that they have a means of communication, in many cases this may be via a receptionist, or answering service. It is the expectation that an issuer of a Reliability Directive would request a return call by the Distribution Provider operating personnel, then issue the Reliability Directive. If this return call would not be timely enough, then the issuer would determine a different mitigation plan.</p>		

Organization	Yes or No	Question 6 Comment
Lakeland Electric		COM-002-3 R2. Each Balancing Authority, Transmission Operator, Generator Operator, Transmission Service Provider, Load-Serving Entity, Distribution Provider, and Purchasing-Selling Entity that is the recipient of a Reliability Directive issued per Requirement R1, shall repeat, restate, rephrase or recapitulate the Reliability Directive with enough details that the accuracy of the message <b>can be</b> confirmed by the originator. (Replace 'has been' with 'can be' and add 'by the originator' to better fit into the sequence with R3.)
<p><b>Response:</b> The RCSDT thanks you for your comments. The RCSDT agrees with the intent of your comment and has modified R2 as:</p> <p>R2. Each Balancing Authority, Transmission Operator, Generator Operator, and Distribution Provider that is the recipient of a Reliability Directive issued in accordance with Requirement R1, shall repeat, restate, rephrase or recapitulate the Reliability Directive with enough details that the accuracy of the message is confirmed.</p>		
Manitoba Hydro		-The current data retention requirement of 90 days is more than adequate. Increasing this period to 12 months would result in a significant amount of work with no benefit to reliability. -Clarification required on the VSL for R9 - there appears to be no
<p><b>Response:</b> The RCSDT thanks you for your comment. The data retention periods for the set of standards proposed is consistent with the guidelines provided in the NERC Drafting team Guidelines. Your second comment is incomplete and does not reference specific standard(s) or requirement(s).</p>		
NextEra Energy, Inc.		At this stage in evolution of compliance with the mandatory Reliability Standards, it is important that any new or revised Reliability Standard clearly articulate all compliance obligations and tasks consistent with Sections 302 (6) and (8) of the NERC Rules of Procedure. COM-002, IRO-001, IRO-002 and IRO-014 do not meet this threshold. Thus, NextEra has numerous recommended corrections to provide clarity and completeness to these Reliability Standards.COM-002 R1The addition of defined terms for Reliability Directive and Emergency is a very good approach that helps provides clarity. Hence, it is also be appropriate to make the language in the requirement as clear as possible, and not add other implied or unexplained notions. Also, at times, in those regions with markets, it is not always clear whether a requirement to curtail for reliability reasons is being issued pursuant to market rules or from the Reliability Coordinator or Transmission Operator under the Reliability Standards. Therefore, it is also appropriate that the Reliability Coordinator, Transmission Operator, Balancing Authority be required to identify themselves;, and if they fail to identify themselves or fail to use the term Reliability Directive, the registered entity receiving the flawed issuance should not be consider in violation of a Reliability Standard for failing to act. Accordingly, R1 would be clearer and have the same intent, if it stated as follows:"A Reliability Coordinator, Transmission Operator or Balancing Authority have the authority to issue an oral or written Reliability Directive as authorized in [list the specific Reliability Standard requirements such as IRO-001 R8 and TOP-001 R3]. The issuance of an oral of written Reliability Directive,

Organization	Yes or No	Question 6 Comment
		<p>by a Reliability Coordinator, Transmission Operator or Balancing Authority shall: (1) use the term ‘Reliability Directive;’ and (2) identify the issuer of the Reliability Directive as a Reliability Coordinator, Transmission Operator or Balancing Authority. If a Reliability Coordinator, Transmission Operator or Balancing Authority issues an oral or written directive without using the term “Reliability Directive” or failing to identify itself as a Reliability Coordinator, Transmission Operator or Balancing Authority, the registered entity receiving the directive cannot be considered in violation for its failure to act.”</p> <p><b>Response:</b> Only reliability entities can issue Reliability Directives and only reliability entities are held compliant to NERC reliability standards. COM-002, R1 requires the issuer of a Reliability Directive to identify the action as a “Reliability Directive”, it is incumbent on the issuer or receiver to identify themselves in order establish authority, the RCSDT disagrees that identification should be part of the COM-002 standard, however, the RCSDT will pass this concern to Project 2007-02, Operating Personnel Communications Protocols SDT. Furthermore, your suggested revision is a compound requirement, making the requirement indistinct and difficult to measure and in contradiction with SAR. The RCSDT agrees that if an action is not identified as a “Reliability Directive” then the receiving entity cannot be held in violation of failing to follow a Reliability Directive.</p> <p>IRO-001The definition of Adverse Reliability Impacts uses the term “instability.” It is important that this term be technically defined in the same way “Cascading” is defined, otherwise the new requirement is not adding clarity; rather, it is maintaining the ambiguous term “instability” that will likely lead to confusion and debate.</p> <p><b>Response:</b> The RCSDT disagrees that the term “instability” is ambiguous, and further believes the term is understood in the industry. The majority of stakeholder comments do not indicate that the definition is confusing.</p> <p>R1 Similar to the comments set forth with respect to COM-001 (question #1), the term “at least” should be deleted from R1 - it serves no useful purpose from a technical or compliance perspective; instead, it will add unnecessary ambiguity to the requirement.</p> <p><b>Response:</b> The RCSDT agrees and has removed “at least” for IRO-001, R1.</p> <p>R2, as drafted, states:”Each Reliability Coordinator shall take actions or direct actions, which could include issuing oral or written Reliability Directives, of Transmission Operators, Balancing Authorities, Generator Operators, Interchange Coordinators and Distribution Providers within its Reliability Coordinator Area to prevent identified events or mitigate the magnitude or duration of actual events that result in Adverse</p>

Organization	Yes or No	Question 6 Comment
		<p>Reliability Impacts. “This long sentence has several significant grammatical errors that result in the reader not being able to discern the meaning of the requirement. It also unnecessarily adds verbiage that detracts from its primary focus. It is, therefore, recommended that R2 be revised as follows:</p> <p>“Each Reliability Coordinator shall take all necessary actions to prevent identified Emergencies or Adverse Reliability Impacts. These Reliability Coordinator actions shall include, to the extent necessary, the issuing of oral or written Reliability Directives to Transmission Operators, Balancing Authorities, Generator Operators, Interchange Coordinators and Distribution Providers located within its Reliability Coordinator Area.</p> <p><b>Response:</b> The RCSDT disagrees that the suggested revisions adds clarity, and in fact removes directing actions “to mitigate the magnitude or duration of actual events” which weakens the requirement. Phrases such as “to the extent necessary” and “necessary actions” are not measurable and lead to a more confusing requirement. Stakeholders generally agree with the proposed verbiage of the proposed requirement.</p> <p>“R3, as drafted, is confusing and inconsistent with R2, and, thus, R3 should be revised to read as follows:</p> <p>”Upon receipt of a Reliability Directive issued pursuant to R2, a Transmission Operator, Balancing Authority, Generator Operator, Interchange Coordinator and Distribution Provider shall comply with the Reliability Directive, unless compliance would violate safety, equipment, regulatory or statutory requirements. In the event that a Transmission Operator, Balancing Authority, Generator Operator, Interchange Coordinator or Distribution Provider determines that compliance with a Reliability Directive would violate safety, equipment, regulatory or statutory requirements, the Transmission Operator, Balancing Authority, Generator Operator, Interchange Coordinator or Distribution Provider shall, within 10 minutes after the determination, inform the Reliability Coordinator of its inability to comply.”</p> <p><b>Response:</b> The RCSDT disagrees with the suggested revision to R3. The revision creates a compound requirement with a specific time requirement. Upon recognition of the inability to perform a directed action, the receiver should immediately inform the Reliability Coordinator. Typically this would be during the original communication of the directive. The suggested 10 minute time is not technically justified and provides no reliability benefit beyond the currently worded requirement and only serves to extend the time before an RC is notified.</p> <p>IRO-002R1 and R2, as written, are confusing. It is recommended that R1 and R2 be combined to read as follows: “Pursuant to a written procedure to mitigate the impact of a Reliability Coordinator’s analysis tool outage, a Reliability Coordinator’s System Operator shall also have the authority to approve, deny or cancel a</p>

Organization	Yes or No	Question 6 Comment
		<p>planned outage for its analysis tool.”</p> <p><b>Response:</b> The suggested revision to IRO-002-2 creates a compound requirement, which is indistinct and difficult to measure and in contradiction with SAR. The SAR for this project directs the team to “Improve clarity of, improve measurability of, and remove ambiguity from the requirement”.</p> <p>IRO-014It is unclear why the terms Operating Procedure, Operating Process or Operating Plan needs to be plural, as currently written in the Standard. Hence, it is recommended that these terms be made singular, otherwise a violation may be inferred for not having more than one Procedure, Process or Plan.</p> <p><b>Response:</b> IRO-014, R1, The RCSDT disagrees with making Procedures, Processes, or Plans non-plural; this could lead to entities being audited on a procedure by procedure basis. In other words, it is meant that the weekly conference calls create an opportunity to discuss all of the Procedures, Processes, or Plans, and to not require a call for each.</p> <p>1.1 Insert the word “applicable” before “Reliability Coordinator.”</p> <p><b>Response:</b> The RCSDT disagrees with the use of applicable, as the 1.1 is subordinate to R1, which notes impacted Reliability Coordinators.</p> <p>2.1, as written, is confusing. Recommend that 2.1 read as follows:</p> <p style="padding-left: 40px;">”Review and update, if an update is necessary, on an annual basis. Annual basis means the review shall be within one month plus or minus that date of the last review.”</p> <p><b>Response:</b> The RCSDT disagrees, and believes the suggested revision is unclear. In its current draft form, the plan or procedure is required to be reviewed every 15 months, if the review indicates that there are no changes required, and then the update would simply be to change the revision date on the published procedure.</p> <p>R3 This requirement uses a very vague term “reliability-related information,” which, also, does not track the language used in R1 -- “information.” It is recommended that R1 and R3 use the same terms and read “. . . information, as defined by the Reliability Coordinator, . . . “</p> <p><b>Response:</b> The RCSDT believes the reference to R1 within R3 clearly is representative of exchange of information related to R1.</p> <p>R4 As stated above, “at least” does not add value, and, therefore, should be deleted.</p>

Organization	Yes or No	Question 6 Comment
		<p><b>Response:</b> The RCSDT disagrees. The inclusion of “at least” allows the calls take place every day or multiple times within a week if desired, and adds flexibility. e.g. if there was scheduled weekly call, however due to system conditions an interim call was held, during this interim call all of the necessary information for the week was exchanged, thus removing the need to the scheduled call, the use of “at least” allows for this kind of flexibility. R4 is applicable to those Reliability Coordinators engaged in activities related to R1 and subsequently R1.7, it is unlikely that Reliability Coordinators whom are geographically and electrically distant will have <i>mutually agreed upon</i> operating procedures (per R1), and as such they are not applicable to R4.</p> <p>R5, as written, is confusing. The recommended fix is to delete “all other” and replace with “impacted”.</p> <p><b>Response:</b> This requirement continues the current practice of informing all RCs of ARIs. Due to the nature of an ARI, this requirement is typically implemented as an RCIS message or a hotline call to all RC’s. This is intended to make all RCs aware of ARIs and support situational awareness.</p>
<p><b>Response:</b> The RCSDT thanks you for your comments.</p>		
United Illuminating Company		<p>Comments: 1. COM-002 R2 seems awkwardly worded.</p> <p>R2. Each [Entity] that is the recipient of a Reliability Directive issued per Requirement R1, shall repeat, restate, rephrase or recapitulate the Reliability Directive with enough details that the accuracy of the message has been confirmed. " R2 as it is written says the repeat is confirming the accuracy of the message itself. I think it is agreed that the repeat back in R2 is to allow the issuer of the Directive to confirm that the message was received accurately understood by the recipient. I suggest:R2. Each [Entity] that is the recipient of a Reliability Directive issued per Requirement R1, shall repeat, restate, rephrase or recapitulate the Reliability Directive with enough details to allow the Issuer to confirm that the directive recipient accurately understands the Directive"</p> <p><b>Response:</b> The RCSDT agrees with the intent of your comment and has modified COM-002-3, R2 as:</p> <p style="padding-left: 40px;">R2. Each Balancing Authority, Transmission Operator, Generator Operator, and Distribution Provider that is the recipient of a Reliability Directive issued in accordance with Requirement R1, shall repeat, restate, rephrase or recapitulate the Reliability Directive.</p> <p>2. The VSL for R2 is severe and states "The responsible entity that was the recipient of a Reliability Directive failed to repeat, restate, rephrase or recapitulate the Reliability Directive with enough details that the accuracy of the message was confirmed." The purpose of the R2 repeat-back is to allow the Issuer verify the message</p>



Organization	Yes or No	Question 6 Comment
		<p>was accurately received. This VSL penalizes the responsible entity for not accurately receiving the message. The VSL should penalize the refusal of the registered entity to repeat back the message not for receiving the message incorrectly. Suggested rewording: "The responsible entity that was the recipient of a Reliability Directive failed to repeat, restate, rephrase or recapitulate the Reliability Directive with enough details that the accuracy of the message can be evaluated by the entity issuing the Reliability Directive"3. United Illuminating does agree with the definition of Reliability Directive and Emergency.</p> <p><b>Response:</b> The RCSDT agrees and has revised the VSL to:</p> <p>The responsible entity that was the recipient of a Reliability Directive failed to repeat, restate, rephrase or recapitulate the Reliability Directive. <del>with enough details that the accuracy of the message was confirmed.</del></p>
<p><b>Response:</b> The RCSDT thanks you for your comments.</p>		
<p>Shell Energy North America (US), L.P.</p>		<p>The introduction of the definition of "Reliability Directive" and its connection to the definition of "Emergency" within this Project brings much needed clarity for the sector and will promote consistency between Regional Entities and within the audits of Registered Entities. Shell Energy supports the removal of Purchasing Selling Entities as a function to which IRO-001 applies. This removal recognizes that PSEs do not play a role in reliability coordination under this standard since they have no authorities and no abilities to assume or perform responsibilities associated with reliability coordination. This conclusion is reinforced by the adoption of the defined term "Reliability Directive". Where a RC, TOP, or BA needs to address an Emergency they do not contact, consult, or direct a PSE to take action that would address the Emergency. Rather, where the PSE is a user of the grid to perform or execute transactions, it is subject to the actions of these other entities that have the authority to stop, curtail, or alter the submitted transactions of the PSE in a way that aids in resolving the problem. With the fitting adoption of "Reliability Directive" into COM-002 as well, Shell Energy does not believe it is necessary or appropriate for the applicability of this standard to include Purchasing Selling Entities, as is contained in the current draft proposal. This standard does not apply to PSEs today, however, during the progression of Project 2006-06 this applicability was added to an early draft version that preceded the discussions and clarification that comes from the definition of a Reliability Directive in the standard. Shell Energy does not support the inclusion of PSEs in the current draft version of COM-002, and feels that it should be removed. The purpose of this standard is, "To ensure Emergency communications between operating personnel are effective" and relates directly to the capabilities and authorities established for the RC, TOP, or BA that requires actions to be taken by a recipient of a Reliability Directive. As noted previously, PSEs are acted upon by the entities with the necessary authority, and are not in a role that would initiate or fulfill the required actions. As additional matters related to the clarification and cleanup of the standards in this project, the implementation plans for both IRO-001 and COM-001 erroneously contain references to PSEs in the sections "Functions that Must Comply with the Requirements". These references</p>

Organization	Yes or No	Question 6 Comment
		need to be removed.
<p><b>Response:</b> The RCSDT thanks you for your comments. The applicability of COM-001 and COM-002 were revised to be consistent and only include the RC, TOP, BA, DP and GOP.</p>		
American Electric Power		<p>The language used in COM-002-3 R2 including “with enough details that the accuracy of the message has been confirmed” is subjective and ambiguous.</p> <p><b>Response:</b> The RCSDT agrees with the intent of your comment and has modified COM-002-3, R2 as:</p> <p style="padding-left: 40px;">R2. Each Balancing Authority, Transmission Operator, Generator Operator, and Distribution Provider that is the recipient of a Reliability Directive issued in accordance with Requirement R1, shall repeat, restate, rephrase or recapitulate the Reliability Directive.</p> <p>IRO-001 R2, R3, and R4 have replaced “Directives” with the word direction in lower case (while it appears that “Directives” is a subset of “directions”). We believe that this muddies the waters and could bring numerous conversations and dialog into scope unnecessarily. The end result is that the RC has the right to issue and use “Directives” and anything short of this could just be communications. For example, a number of entities that are Reliability Coordinators also facilitate energy markets. There are many communications related to markets that probably should be out of scope with respect to the standards. Furthermore, it might not be clear what role (eg Reliability Coordinator, market operator, etc) the staff at these entities are fulfilling.</p> <p><b>Response:</b> IRO-001 is written so that typical daily operating orders or directives could be used, and also to cover emergency scenarios, but stating the use of Reliability Directives is included. The requirement language specifically ties back to Requirement R2 which states that the RC “shall take actions or direct actions, which could include issuing Reliability Directives, “. This is the “direction in accordance with Requirement R2” stated in R3 and the “direction in accordance with Requirement R3” stated in R4.</p>
<p><b>Response:</b> The RCSDT thanks you for your comments.</p>		
American Transmission Company		None

Organization	Yes or No	Question 6 Comment
ISO New England		<p>The SDT did not address all of our concerns with COM-002-3 from the last posting. For entities registered as multiple functions, the combination of the definition of Reliability Directive and Requirement R1 could be confused to require a company to issue directives to itself. There are several organizations registered as a Reliability Coordinator, Transmission Operator and Balancing Authority. In these companies, it is not uncommon for those responsibilities to be distributed across multiple desks. Thus, for certain situations, a single System Operator may actually be the Reliability Coordinator and the Transmission Operator. In other situations, the System Operator serving the Reliability Coordinator function may be adjacent to the System Operator serving the as the Transmission Operator or Balancing Authority. We believe that it should never be necessary for these System Operators to issue Reliability Directives to themselves in the first example or to their co-worker in the second example to demonstrate compliance to NERC standards. How the entity coordinates its actions among its Reliability Coordinator, Balancing Authority and Transmission Operator roles is a corporate governance issue that should not be confused or complicated by the NERC standards. Thus, we believe that standards should be made clear that the Reliability Directive is directed to another company. We believe that, in place of requiring an operator, in real-time, to state “this is a Reliability Directive,” there should be an allowance for an entity to develop procedures indicating, in advance, their expectations of three-part to their sub-operating entities. Therefore, we suggest modifying R1 to be “When a Reliability Coordinator, Transmission Operator or Balancing Authority requires actions to be executed as a Reliability Directive, the Reliability Coordinator, Transmission Operator or Balancing Authority shall identify the action, either verbally, when the communication is issued, or in advance through documented procedures, as a Reliability Directive to the recipient. [Violation Risk Factor: High][Time Horizon: Real-Time.]” Also, we believe that the definition of Emergency, as currently cited in these draft Standards and included in the existing NERC Glossary should be modified to include the NERC Glossary term Adverse Reliability Impact to make the Standards more crisp, clear and enforceable. Because the Project 2007-03 Real-Time Operations SDT proposed to utilize the definition of Adverse Reliability Impact in TOP-001-2 R5 during the last posting, the change to the definition should be coordinated with that team. There is a text box in IRO-005-4 that indicates this standard will be retired. Yet, there still remain requirements in the standard and various other associated documentation indicates requirements are being move to this standard. Please delete the text box. IRO-014-2 R4 already includes a requirement to have weekly conference calls that should suffice. IRO-014-2 R2 seems to recognize that these Operating Procedures, Processes and Plans likely will not need to be discussed weekly as it only requires an annual update. In the definition of Reliability Directive, we suggest changing “to address an Emergency” to “to address a reliability constraint or a declared Emergency”. Further, Requirement R2 in IRO-001 contains the words “which could include issuing Reliability Directives” but Reliability Directives are not referenced anywhere else in the standard. This inclusion seems unnecessary since without it, R2 already requires that the RC take actions or direct actions by others to prevent identified events or mitigate the magnitude or duration of actual events that result in Adverse Reliability Impacts. Whether or not a Reliability Directive is issued is irrelevant in this requirement. We suggest that these words be removed. Note that COM-002 already stipulates the requirement for 3-part communication when a</p>

Organization	Yes or No	Question 6 Comment
		Reliability Directive is issued. The inclusion of “which could include issuing Reliability Directives” in IRO-001 is unnecessary.
<p><b>Response:</b> The RCS DT thanks you for your comments. See response to MRO above.</p>		
ERCOT ISO		<p>The SDT did not address all of our concerns with COM-002-3 from the last posting. For entities registered as multiple functions, the combination of the definition of Reliability Directive and Requirement R1 could be confused to require a company to issue directives to itself. There are several organizations registered as a Reliability Coordinator, Transmission Operator and Balancing Authority. In these companies, it is not uncommon for those responsibilities to be distributed across multiple desks. Thus, for certain situations, a single System Operator may actually be the Reliability Coordinator and the Transmission Operator. In other situations, the System Operator serving the Reliability Coordinator function may be adjacent to the System Operator serving the as the Transmission Operator or Balancing Authority. We believe that it should never be necessary for these System Operators to issue Reliability Directives to themselves in the first example or to their co-worker in the second example to demonstrate compliance to NERC standards. How the entity coordinates its actions among its Reliability Coordinator, Balancing Authority and Transmission Operator roles is a corporate governance issue that should not be confused or complicated by the NERC standards. Thus, we believe that standards should be made clear that the Reliability Directive is directed to another company. We believe that, in place of requiring an operator, in real-time, to state “this is a Reliability Directive,” there should be an allowance for an entity to develop procedures indicating, in advance, their expectations of three-part to their sub-operating entities. Therefore, we suggest modifying R1 to be “When a Reliability Coordinator, Transmission Operator or Balancing Authority requires actions to be executed as a Reliability Directive, the Reliability Coordinator, Transmission Operator or Balancing Authority shall identify the action, either verbally, when the communication is issued, or in advance through documented procedures, as a Reliability Directive to the recipient. [Violation Risk Factor: High][Time Horizon: Real-Time.]” Also, we believe that the definition of Emergency, as currently cited in these draft Standards and included in the existing NERC Glossary should be modified to include the NERC Glossary term Adverse Reliability Impact to make the Standards more crisp, clear and enforceable. Because the Project 2007-03 Real-Time Operations SDT proposed to utilize the definition of Adverse Reliability Impact in TOP-001-2 R5 during the last posting, the change to the definition should be coordinated with that team. There is a text box in IRO-005-4 that indicates this standard will be retired. Yet, there still remain requirements in the standard and various other associated documentation indicates requirements are being move to this standard. Please delete the text box. IRO-014-2 R4 already includes a requirement to have weekly conference calls that should suffice. IRO-014-2 R2 seems to recognize that these Operating Procedures, Processes and Plans likely will not need to be discussed weekly as it only requires an annual update. In the definition of Reliability Directive, we suggest changing “to address an Emergency” to “to address a reliability constraint or a declared Emergency”. Further, Requirement R2 in IRO-001 contains the words “which could include issuing Reliability Directives” but Reliability Directives</p>

Organization	Yes or No	Question 6 Comment
		<p>are not referenced anywhere else in the standard. This inclusion seems unnecessary since without it, R2 already requires that the RC take actions or direct actions by others to prevent identified events or mitigate the magnitude or duration of actual events that result in Adverse Reliability Impacts. Whether or not a Reliability Directive is issued is irrelevant in this requirement. We suggest that these words be removed. Note that COM-002 already stipulates the requirement for 3-part communication when a Reliability Directive is issued. The inclusion of “which could include issuing Reliability Directives” in IRO-001 is unnecessary.</p>
<p><b>Response:</b> The RCSDT thanks you for your comments. See response to MRO above.</p>		
WECC		<p>Suggested minor revision to the definition of Reliability Directive as follows (change in caps)A communication, IDENTIFIED AS A RELIABILITY DIRECTIVE, initiated by a Reliability Coordinator, Transmission Operator, or Balancing Authority where action by the recipient is necessary to address an Emergency. Clearly identifying a communication as a Reliability Directive provides immediate information to the recipient as to the nature of the communications.</p>
<p><b>Response:</b> The RCSDT thanks you for your comments. The RCSDT believes embedding the term in “Reliability Directive” in the definition is a not proper method for defining a term.</p>		
BGE		<p>BGE has no additional comments.</p>
Duke Energy		<p>o COM-002-3 contains the proposed definition “Reliability Directive”. We continue to believe Requirement R1 should be deleted and that this definition should contain the phrase “identified as a Reliability Directive to the recipient”. Otherwise, compliance controversies will arise when auditors second-guess the RC, TOP or BA’s judgment regarding whether or not an abnormal system condition met the definition of “Emergency”, and warranted a “Reliability Directive” with 3-part communication. A conforming change will need to be made to R2, since it refers to R1. This change in the definition of “Reliability Directive” is also needed because this term is used in other standards such as IRO-001-2, and without repeating a similar requirement to COM-002-3 requirement R1 in IRO-001-2, there is potential for confusion.</p> <p><b>Response:</b> The RCSDT disagrees as the suggestion embeds a requirement in a definition. The SDT believes the requirements of COM-002 are clear as written.</p> <p>o We disagree with the VSL for COM-002-3. This is clearly a requirement with two possible compliance failures: Failure to acknowledge a correct repeat-back, and failure to resolve an incorrect repeat-back. These failures have dramatically different consequences, which the drafting team should recognize via a graduated VSL. We think that the failure to acknowledge should either be “Lower” or “Medium”.</p> <p><b>Response:</b> The RCSDT contends that missing the requirement is a binary violation that results in a severe</p>

Organization	Yes or No	Question 6 Comment
		<p>VSL. You are including risk to the BES in your proposal for the VSL. Risk to the BES is captured in VRFs, while VSLs consider the degree to which the entity failed to meet the Requirement.</p> <p>O Requirement R2 of IRO-001-2 is unclear and should be reworded as follows:</p> <p>“Each Reliability Coordinator shall take actions or direct actions (which could include issuing Reliability Directives to Transmission Operators, Balancing Authorities, Generator Operators, Interchange Coordinators and Distribution Providers within its Reliability Coordinator Area) to either prevent identified events that could result in an Adverse Reliability Impact, or mitigate the magnitude or duration of actual events that result in Adverse Reliability Impacts.”</p> <p><b>Response:</b> The RCSDT believes that the suggested revision does not add further clarity to the requirement.</p> <p>o Various changes have been made to the defined term “Adverse Reliability Impact” as this project has progressed. We believe the latest change should not be made, and the Phrase “uncontrolled separation” should be reinserted in the definition, because that phrase is part of the EAct 2005 legislation definition of “reliable operation”. Here is the text from the legislation: “The term ‘reliable operation’ means operating the elements of the bulk-power system within equipment and electric system thermal, voltage, and stability limits so that instability, uncontrolled separation, or cascading failures of such system will not occur as a result of a sudden disturbance, including a cyber security incident, or unanticipated failure of system elements.”</p> <p><b>Response:</b> During the last posting of the proposed definition, the RCSDT received the following comment and revised the definition appropriately: “This change is problematic in that any automatic protective element operation that trips a BES element could be construed to be an Adverse Reliability Impact.”. The modification eliminated the phrase “that affects a widespread area of the Interconnection” which clarified the scope of the definition. “Uncontrolled separation” has been deleted from the definition, as it is included in the definition of Cascading.</p>
<p><b>Response:</b> The RCSDT thanks you for your comments. Please see responses above.</p>		
CECD		<p>1. COM-002 R2 states that "the recipient of a Reliability Directive issued per Requirement R1, shall repeat, restate, rephrase or recapitulate the Reliability Directive with enough details that the accuracy of the message has been confirmed." Recommend a change to "the recipient of a Reliability Directive issued per Requirement R1, shall repeat, restate, rephrase or recapitulate the Reliability Directive with enough details that the desired outcome of the message is clear".</p> <p><b>Response:</b> The RCSDT agrees with the intent of your comment and has modified COM-002-3, R2 as:</p> <p>R2. Each Balancing Authority, Transmission Operator, Generator Operator, and Distribution Provider that is the recipient of a Reliability Directive issued in accordance with Requirement R1, shall repeat, restate,</p>

Organization	Yes or No	Question 6 Comment
		<p>rephrase or recapitulate the Reliability Directive.</p> <p>2. IRO-001 R2 states "Each Reliability Coordinator shall take actions or direct actions which could include issuing Reliability Directives of Transmission Operators, ...." Recommend a change to "Each Reliability Coordinator shall take actions or direct actions which could include issuing Reliability Directives [See COM-002] to Transmission Operators, ..."</p> <p><b>Response:</b> Based on feedback from other stakeholders, the RCSDT believes that the existing verbiage is clear and does not require further revision.</p> <p>3. IRO-001 R4 states entities "shall inform its Reliability Coordinator upon recognition of its inability to perform as directed per Requirement R3." Recommend a change to, entities "shall inform its Reliability Coordinator upon recognition of its inability to perform as directed."</p> <p><b>Response:</b> Based on feedback from other stakeholders, the RCSDT believes that the existing verbiage is clear and does not require further revision.</p>
<p><b>Response:</b> The RCSDT thanks you for your comments.</p>		
Indeck Energy Services		
City of Springfield, IL - City Water Light and Power (CWLP)		<p>CWLP generally concurs with and supports comments previously submitted by the SERC Operating Committee where those comments are not in conflict with the specific comments above.</p>
<p><b>Response:</b> The RCSDT thanks you for your comments.</p>		
South Carolina Electric and Gas		<p>1. Reliability Directives may be issued by blast calls from Reliability Coordinators. It is inefficient and may be a hindrance to reliability to require 3-part communications in these instances.</p> <p><b>Response:</b> The RCSDT agrees that the use of Blast Calls to issue Reliability Directives, in mass, is efficient and effective. The RCSDT believes Reliability Directives issued in mass should be defined by procedure, and that the procedure would establish a method of affirmation and notice of implementation.</p> <p>2. There are several organizations registered as BAs, RCs and TOPs. It is not uncommon for those entities to be distributed across multiple desks in the same control room without regard to how an entity is registered. Thus, a single System Operator may perform functions that are categorized under two or more of those functional entities. The drafting team should clarify that under no circumstances should that System Operator be required to issue a Reliability Directive to himself. This is a corporate governance</p>

Organization	Yes or No	Question 6 Comment
		<p>issue.</p> <p><b>Response:</b> The RCSDT believes that any Registered Entity or person operating as such must understand the intent of the issued Reliability Directive, and that the issuer of the Reliability Directive believe that the Reliability Directive was correctly received. COM-002 should not be construed to mean that an individual serving in two functions be required to issue a Reliability Directive to himself, but rather it is expected that such an individual would appropriately address the reliability issues as required by the function they are serving and its subsequent responsibilities</p> <p>3. In IRO-014, R1, delete sub-requirement 1.7. The requirement for weekly conference calls related to operating procedures is duplicative to R4 and could be burdensome while adding very little value under certain circumstances.</p> <p><b>Response:</b> R1, Part 1.7 requires an entity to address how and when they will hold conference calls in their Operating Plans, Processes or Procedures. R4 requires the participation in those calls.</p> <p>4. In IRO-014, R4, delete the phrase “(per Requirement 1, Part 1.7)” as a conforming change.</p> <p><b>Response:</b> R1, Part 1.7 requires an entity to address how and when they will hold conference calls in their Operating Plans, Processes or Procedures. R4 requires the participation in those calls.</p> <p>5. In IRO-014, Requirements R6-R8 allow at least the theoretical possibility that an RC may determine an Adverse Reliability Impact in another RC’s area that the other RC neither can see nor believes that any action should be taken. R7 puts the burden on the first RC to develop a plan that it cannot implement because it has no agreement with the BAs and TOPs in the other RC area. As such, this requirement is unenforceable.</p> <p><b>Response:</b> You are correct. Requirements R6-R8 are translated from IRO-016-1, Requirement R1. If an RC sees a problem and another does not see the same problem, then there may be an issue with someone’s model or processes or procedures. The RC’s are supposed to have coordinated Operating Plans, Processes or Procedures to operate reliably. R6-R8 are only applicable if one of the two (or more) RCs do not see that a problem exists. It would be a detriment to reliability for both RCs to take no action. RCs are required to coordinate actions under existing IRO-016-1, R1. If one RC identifies a problem and provides an action plan to another RC to mitigate the problem, the second RC is obligated under R8 to implement it. We have revised the R8 to clarify this intent.</p> <p>Revised R8. During those instances where Reliability Coordinators disagree on the existence of an Adverse Reliability Impact, each Reliability Coordinator shall implement the action plan developed by the Reliability Coordinator that identified the Adverse Reliability Impact unless such actions would violate safety, equipment, regulatory or statutory requirements.</p>



Organization	Yes or No	Question 6 Comment
		<p>6. Please review all the implementation plans to be sure the applicable entities match those in the standards.</p> <p><b>Response:</b> We have revised the implementation plans to reflect the appropriate applicability.</p>
<p><b>Response:</b> The RCSDT thanks you for your comments.</p>		
<p>Independent Electricity System Operator</p>		<p>1. IRO-001: Reliability Directive: We do not agree with the proposed definition since it addresses Emergencies only. There are situations where a Reliability Directive is issued such that the directed action must be taken by the receiving entity to address a reliability constraint or any condition on the BES which if left unattended could, in the judgment of the issuing entity, lead to an Emergency. These conditions themselves do not constitute an Emergency which is defined as “Any abnormal system condition that requires automatic or immediate manual action to prevent or limit the failure of transmission facilities or generation supply that could adversely affect the reliability of the Bulk Electric System.” There could be no abnormal condition but the actions must nevertheless be taken promptly to prevent the bulk electric system from entering into an abnormal condition. We therefore suggest the term Reliability Directive be revised to: Reliability Directive: A communication initiated by a Reliability Coordinator, Transmission Operator or Balancing Authority where action by the recipient is necessary to address a reliability constraint or an Emergency.</p> <p><b>Response:</b> The RCSDT believes that your comment concerns “directives” or “instructions” for normal operational activities rather than a Reliability Directive. There is no requirement preventing an entity from issuing either directives or instructions for the situations you mention. The intent of creating a Reliability Directive definition is to ensure that communications is tightened during Emergencies (per blackout report). When an RC issues a Reliability Directive, the RC has made a deliberate decision to formally end collaboration and require specific action(s).</p> <p>2. IRO-001, Requirement R2: This requirement contains the words “which could include issuing Reliability Directives” which is not referenced anywhere else in the standard. We do not think this inclusion is necessary since without it, R2 already requires that the RC take actions or direct actions by others to prevent identified events or mitigate the magnitude or duration of actual events that result in Adverse Reliability Impacts. Whether or not a Reliability Directive is issued is irrelevant in this requirement. We suggest to remove these words. Note that COM-002 already stipulates the requirement for 3-part communication when a Reliability Directive is issued. The inclusion of “which could include issuing Reliability Directives” in IRO-001 is unnecessary. We suggest replacing “identified events” with “anticipated events”. This requirement also lists Interchange Coordinators as one of the recipients of Reliability Directives which is not consistent with the</p>

Organization	Yes or No	Question 6 Comment
		<p>implementation plan.</p> <p><b>Response:</b> R2 requires the Reliability Coordinator to act. These actions could include Reliability Directives in the case of an Emergency. However, issuing Reliability Directives might not always be necessary, as the Reliability Coordinator may be acting proactively well in advance of an emergency. R2 promotes this proactive approach, but reserves the use of Reliability Directives for circumstances that require its use. Your suggested edits are not supported by the majority of stakeholder comments. The Interchange Coordinator has been removed from the standard.</p> <p>3. IRO-014: R4 as written creates unnecessary requirements for an RC to participate in conference calls for issues that may not affect the RC itself. We suggest to reinstate the original word “impacted” as opposed to “other”, and remove the words “within the same Interconnection” since such calls and coordination may be required for RCs on both side of the Interconnection boundary. Same change suggested for R5, i.e. replace “other” with “impacted”.</p> <p><b>Response:</b> The requirement for weekly conference calls exists in IRO-015-1. The RCSDT has revised the requirement and incorporated it into proposed IRO-014-2. IRO-14-2, R4 is applicable to those Reliability Coordinators engaged in activities related to R1 and subsequently R1.7, it is unlikely that Reliability Coordinators that are geographically and electrically distant will have mutually agreed upon operating procedures (per R1), and as such they are not applicable to R4. If RCs in different interconnections have operating procedures (per R1) with each other, then these operating procedures may include specifications for conference calls at least weekly.</p> <p>4. If an entity provides Interpersonal Communication for day-to-day communication using two different media, e.g. radio and telephone, the proposed definition of Alternative Interpersonal Communication suggests that it would not be possible for one medium to be used as the Alternative Interpersonal Communication for the other since the two media are both used every day.</p> <p><b>Response:</b> The intent of AIC is to make sure there is an alternative in case the IC fails. If you have two, you may designate one as the AIC regardless of how often you use it.</p> <p>5. COM-001-2 R10 suggests that the responsible entity must wait for at least 30 minutes before notifying other entities of the failure of its Interpersonal Communication capability. We recommend changing “that lasts 30 minutes” to “that lasts or is expected to last 30 minutes”. This allows responsible entities to start notifying other entities earlier.</p>

Organization	Yes or No	Question 6 Comment
		<p><b>Response:</b> The requirement is written such that an outer bound is set for notifications. An entity does not have to wait and can begin notifications immediately if it knows that an outage will last more than 30 minutes.</p> <p>6. In IRO-005-4 R1: Delete “notify”.</p> <p><b>Response:</b> The phrase “issue an alert” was removed in the redline version but was not removed from the clean version. This was corrected.</p>
<p><b>Response:</b> The RCSDT thanks you for your comments.</p>		