

COM-001-3

Interpersonal Communications Capabilities

Background

In the FERC Notice of Proposed Rulemaking (NOPR) for COM-001-2, the Commission asked for comments on whether the standard should be modified to address **internal** communication capabilities.

FERC Order No. 808

The order directed NERC to address:

“[t]he adequacy of internal communications capability whenever internal communications could directly affect the reliable operation of the Bulk-Power System.” Order No. 808, at P 41.

COM-001-3

Two separate requirements were necessary to address different VRFs based on the risks associated with different functional registrations.

Requirement R13 is also necessary since the NERC Glossary term “Control Center” does not include Distribution Providers.

Requirement 12:

Each RC, TOP, GOP, and BA shall have internal Interpersonal Communication capabilities for the exchange of information that is necessary for the Reliable Operation of the BES, **to include Control Centers within the same functional entity, or between a Control Center and field personnel within the same functional entity.**

*[Violation Risk Factor: **High**]

*[Time Horizon: Real-time Operations]

Measures for R12:

- Each RC, TOP, GOP, and BA shall have and provide upon request evidence that it has internal Interpersonal Communication capability, which could include, but is not limited to:
 - physical assets, or
 - dated evidence, such as, equipment specifications and installation documentation, operating procedures, test records, operator logs, voice recordings, transcripts of voice recordings, or electronic communications.

Requirement 13:

Each DP shall have internal Interpersonal Communication capabilities for the exchange of information that is necessary for the Reliable Operation of the BES, **to include control centers within the same functional entity, or between a control center and field personnel within the same functional entity.**

*[Violation Risk Factor: **Medium**]

*[Time Horizon: Real-time Operations]

Measures for R13:

- Each DP shall have and provide upon request evidence that it has internal Interpersonal Communication capability, which could include, but is not limited to:
 - physical assets, or
 - dated evidence, such as, equipment specifications and installation documentation, operating procedures, test records, operator logs, voice recordings, transcripts of voice recordings, or electronic communications.

Discussion on Measures

Interpersonal Communication

- any medium that allows two or more individuals to interact, consult, or exchange information

Capabilities

- are not limited but encompass any medium that allows two or more individuals to interact, consult, or exchange information
- The SDT agreed that these capabilities are absolute

Industry Comments

“Requirements are too broad as written.”

- The SDT worked to craft language that allows for necessary flexibility to accommodate different geographical areas/regions and entity configurations.

“The recommendations from FERC (i.e., geographically separate control centers) should/should not be in the Requirements.”

- The SDT revised requirements R12 to state, “to include Control Centers within the same functional entity, or between a Control Center and field personnel within the same functional entity.”
- “control centers, R13

“Including GOP and DP go beyond the FERC directive.”

- COM-001 was expanded from FERC Order No. 693 (p. 475) to include GOPs and DPs. Proposed Requirements R12 and R13 reflect that general update since COM-001-1.1.

“FERC directive should be handled in a guidance document or through the certification process, not a mandatory Requirement.”

- FERC directed NERC to modify the existing standard or develop a new standard to address the issue.

Implementation Plan

Implementation Plan

- Proposed COM-001-3 effective date is nine (9) months from approval by FERC or other applicable governmental authority
 - October 1, 2017

Impact to SPP

What questions do you have?



Questions about this
presentation?

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