

Note – This form is to comment on version 2 of the Coordinate Operations Standard.

The latest version of this Standard (**COORD_OPERATONS_05_02**) is posted on the Standards web site at: <http://www.nerc.com/~filez/standards/Coordinate-Operations.html>

E-mail this form between June 2–July 2, 2004 to: sarcomm@nerc.com with “Comments” in the subject line.

If you have any questions about this Standards Draft Comment Form, please contact the Director of Standards — Gerry Cauley at 609-452-8060.

Background:

The Coordinate Operations Standard Drafting Team produced this second draft of the Coordinate Operations Standard

The most significant changes to the standard include the following:

Requirement 101 — Procedures, Processes or Plans

1. Changed the requirement so it is clear that you need to obtain ‘agreement’ rather than ‘approval’ from any RA that is expected to take action as part of a Procedure, Process or Plan that involves RA to RA coordination.
2. Removed ‘system restoration’ from the list of topics that must be addressed by Procedures, Processes or Plans, since there will be another standard that addresses this topic.
3. Added ‘the authority to act to prevent and mitigate instances of causing adverse impacts to other Reliability Authority Areas’ to the list of topics that must be addressed by Procedures, Processes or Plans.
4. Removed the requirement for a Document Change Control Procedure — but added a requirement that Procedures, Processes and Plans have either a version control number or date and a distribution list.

Requirement 102 — Notifications and Information Exchange

5. Changed the requirement to participate in ‘daily conference calls’ with adjacent RAs to a requirement to participate in agreed upon calls with adjacent RAs at least weekly.

Requirement 103 — Coordination

6. Modified the requirement to align with the newly approved Operating Policies — In the revised requirement, if RAs can’t agree on whether there is a problem, the RAs must operate as though the problem exists. If RAs can’t agree on the solution to a problem, they must operate to the most conservative solution identified.
7. Modified the documentation requirement so that it simply requires evidence of coordination, rather than a list of elements for each coordinated event.
8. Removed the requirement to compile a list of events that involved RA to RA coordination.

Requirements 101, 102, 103 — Modified Compliance Monitoring and Levels of Non-compliance to make them simpler.

Definitions

Operating Procedure: The definition of a Procedure was changed slightly to clarify that although procedures are written with the intent that they be followed as written, the real-time conditions may vary from the expected conditions that served as a basis for that Operating Procedure. To clarify that system operators are not expected to follow an Operating Procedure exactly as written 100% of the time, the word, ‘must’ was changed to ‘should’ to indicate the steps in the procedure ‘should’ be followed.

Operating Procedure: A document that identifies specific steps or tasks that **should must** be taken by one or more specific operating positions to achieve specific operating goal(s). The steps in an Operating Procedure **should must** be followed in the order in which they are presented, and should be performed by the position(s) identified. A document that lists the specific steps to take in removing a specific transmission line from service is an example of an Operating Procedure.

1. Do you agree with the changes made to the definition of Operating Procedure?

- Yes
 No
 Comments:

The word must is qualified with an additional caveat as outlined below:

Operating Procedure: A document that identifies specific steps or tasks that **must** be taken by one or more specific operating positions to achieve specific operating goal(s). The steps in an Operating Procedure **must** be followed in the order in which they are presented, and should be performed by the position(s) identified, **unless operating in that exact order is not appropriate for the specific situation**. A document that lists the specific steps to take in removing a specific transmission line from service is an example of an Operating Procedure.

Compliance Monitoring

Concerns have been raised about allowing non-compliant performance to remain unresolved. The revised standard indicates that if an entity is found non-compliant, that entity shall be subject to re-audit every 90 days until found fully compliant.

2. Do you agree with this change to the Compliance Monitoring sections of this standard?

- Yes
 No
 Comments:

Requirement 101

The language in Requirement 101 has been revised to indicate that if an RA has a Procedure, Process or Plan that includes actions that involve another RA, then the RA that is expected to take those actions must obtain approval from those RAs that are expected to take actions — and the documents must be distributed to those RAs that are expected to take actions. The language in the revised standard indicates that the RAs expected to take actions must ‘agree’ to those actions. The revised standard states:

- (ii) Each Reliability Authority's Operating Procedure, Process or Plan that requires one or more other Reliability Authorities to take action (e.g. make notifications, exchange information, or coordinate actions) shall be:
 - A) Agreed to by all the Reliability Authorities required to take the indicated action(s).
 - B) Distributed to all Reliability Authorities that are required to take the indicated action(s).

3. Do you agree with the change from ‘approve’ to ‘agree to’?

- Yes
- No
- Comments:

With the first posting of this standard, the SDT asked the industry the following question:

- Do you agree with the SDT that documenting the RA’s authority to assist in resolving problems that it caused to another system is addressed in the RA Certification Criteria?

Note that this is one of the topics that was identified in the SAR for this standard. There was no consensus on this issue, but many commenters indicated a preference for including this requirement in this standard. To address this concern, the SDT added the following to 101(a)(1)(F) as one of the topics that must be addressed by each RA in a Procedure, Process or Plan:

- Authority to act to prevent and mitigate instances of causing adverse impacts to other Reliability Authority Areas.

4. Do you agree with this addition to Requirement 101?

- Yes
- No
- Comments:

Comment Form for 2nd Posting of Coordinate Operations Standard

One of the changes to this requirement was to drop the requirement that each RA have a Document Change Control Procedure. The SAR for this standard indicated the standard should address maintenance of procedures. To try and move towards consensus, the requirement was changed:

- To require that procedures be reviewed at least once every three years, and updated if needed.
- To require that each of the Procedures, Processes or Plans under this requirement include a version control number or date and a distribution list.

The intent of requiring a version control number or approval date was to provide the system operators with some reference to use when several different versions of the same procedure end up in the control room. The version control number or approval date could be used to distinguish the most recently approved version of a document from older versions.

The intent in requiring a distribution list was to provide the system operators with a ready list of other entities that had received a copy of the document, and to provide the Compliance Monitor with a ready list of entities that should have received copies of the document.

Some commenters recommended that each Procedure, Process or Plan include a 'summary of changes' that would identify the changes made between versions of a document. This summary can be quite useful in saving system operators time when only one or two lines in a very long procedure are changed.

5. Do you think once every three years is an appropriate time period for reviewing the procedures addressed by this standard?

Yes

No

Comments: We also support that the review to be made on a bi-annual basis. A review should/could be made earlier if an RA makes significant changes in their operations that would/could impact this procedure.

6. Do you think the standard should require each Procedure, Process or Plan addressed in Requirement 101 have a version control number or date?

Yes

No

Comments:

7. Do you think the standard should require each Procedure, Process or Plan addressed in Requirement 101 have a distribution list?

Yes

No

Comments:

8. Do you have any other comments on Requirement 101?

- Yes
- No
- Comments:

9. Do you agree with the Compliance Monitoring for 101?

- Yes
- No
- Comments:

With regards to standard 101 section d (3), we suggest a change be made to indicate5 “**business**” days.

10. Do you agree with the Levels of Non-compliance for 101?

- Yes
- No
- Comments:

Requirement 102

In the first posting of the this standard, there was a requirement that the Reliability Authority’s Operating Procedures, Process, and Plans address daily communication and that the Reliability Authority participate in agreed upon daily conference calls. In developing these requirements routine calls were deemed necessary to:

1. Test the communication system.
2. Familiarize all of the system operators with the procedure on using the communication system.
3. Establish a working relationship between the various Reliability Authorities.

Daily calls were necessary to:

4. Discuss environmental conditions such as adverse weather or fires so that all the Reliability Authorities would have the same information, be aware of what each Reliability Authority was doing to respond to various conditions, and have a common basis on which to make operating decisions.
5. Share load forecasts and expected resource availability.
6. Provide each Reliability Authority with information that they may need in analyzing situations that might arise during the day.

The industry comments were in favor of ‘agreed upon’ conference calls with adjacent Reliability Authorities, but most commenters indicated that daily conference calls were too often. In discussing these comments, the Standard Drafting Team members pointed out that experience has demonstrated the following:

- When routine tests of the communication system are not performed, the communication system does not function properly when it is needed.

- When routine tests are not performed by the system operators who will need to communicate during an emergency, the system operators may not know how to use the communication system when they need to communicate.
- There wasn't a consensus on how frequently calls should be conducted, but several commenters indicated that some minimum frequency should be established. In the revised standard, the minimum frequency is at least once a week, instead of daily.

Weekly calls can address the items 1, 2, & 3 above. Items 4, 5, & 6 could be addressed in the Procedures, Processes, and Plans for communication and sharing information between Reliability Authorities.

11. Do you agree with this change to the standard — that each RA should participate in a conference call with its adjacent RAs at least once a week?

- Yes
- No
- Comments:

12. Do you agree with the Compliance Monitoring for 102?

- Yes
- No
- Comments:

With regards to standard 102 section d (3), we suggest a change be made to indicate5 **"business"** days instead of "5 days"

13. Do you agree with the Levels of Non-compliance for 102?

- Yes
- No
- Comments:

Requirement 103

The standard was revised to include the requirement that RAs with disagreements on whether there is a problem, shall both operate as though the problem exists. The standard also was changed to require that if RAs can't agree on the solution to a problem, they shall operate to the most conservative solution identified. This change was made to align this standard's requirements with the same performance concepts included in the newly approved Operating Policy 9.

14. Do you agree with this change to Requirement 103?

Yes

No

Comments: Change 103.1.ii.B to the following:

If time does not permit, then each RA shall operate as though the **worse case** problem exists until the conflicting system status is resolved.

15. Do you agree with the Compliance Monitoring for 103?

Yes

No

Comments:

16. Do you agree with the Levels of Non-compliance for 103?

Yes

No

Comments: Distinction between "potential" and "expected" events should be clarified.

Other Issues

17. Do you think there is a need for a Technical Reference to support this standard?

Yes

No

Comments: Only if there are complex or controversial topics that require further explanation.

If you do think there should be a Technical Reference, what topic(s) do you feel should be addressed in the Technical Reference?

Topics:

18. Are you aware of any Regional or Interconnection Differences that should be added to this standard?

Comments: No

19. Other comments on this standard:

Comments: We support this standard as well as the comments submitted by ISO/RTO Standards Review Committee.