

Trustees Decide on Interpretation of COM-002-2

At its meeting on February 9, 2012, NERC's Board of Trustees (BOT) adopted [an industry interpretation of COM-002-2](#). The interpretation had been approved by stakeholders, with 94.58% approval, in a December 2011 recirculation ballot, confirming that the industry believes COM-002-2's requirements for three-part communication should apply only to declared emergencies.

On October 1, 2009, the ISO/RTO Council requested a clarification of Requirement R2 of COM-002-2, specifically asking whether "directives" are limited to actions requested during actual and anticipated emergency operating conditions, or whether routine operating instructions are also considered "directives."

The interpretation project was delayed following discussion with the requester, based on the anticipation that more clarity regarding the term "directives" would be identified through standard development work in Project 2007-02 Operating Personnel Communication Protocols (COM-003-1). That project is also addressing the use of verbal operating communications and supports using three-part communication any time an action alters the operating state of the Bulk Electric System.

When it became clear that the work on Project 2007-02 would require considerable industry debate, an interpretation drafting team (IDT) was formed to prepare a draft interpretation, which was posted for a 30-day formal comment period that ended in December 2010. However, work was further delayed by reprioritization of the total standards workload in accordance with guidance from the BOT, and again delayed as the Standards Committee (SC) developed more formal processes for addressing interpretations.

In April 2011, the SC approved and issued the [Guidelines for Interpretation Drafting Teams](#) and directed that work resume on the COM-002-2 interpretation. In September 2011, the ISO/RTO Council submitted a Level 1 Appeal for Inaction, requesting that Project 2009-22 be given an "immediate/urgent" priority and be addressed within 30 days of receiving the appeal with a formal explanation of the delays associated with the project. The NERC Vice President of Standards responded to the appeal with the requested information, and the IDT reached consensus on September 13, 2011.

The interpretation, which states that "directives" in COM-002-2 refer only to real-time emergencies, was posted for industry comment on October 10, 2011, with a parallel ballot in November 2011. The ballot achieved a 95.05% approval, but minority commenters expressed concern that the interpretation improperly and unnecessarily restricts the reach of requirement R2, increasing the risk to the Bulk Electric System (BES). Those commenters suggested that three-part communication be used for all directives, not just emergency directives.

NERC staff shared this concern, so during the interpretation commenting process, it submitted a letter (available on pages 13-14 of Project 2009-22's [November 2011 Comments Received report](#)) to the IDT pointing out that by limiting three-part communication to emergencies, the interpretation effectively will increase compliance risk. As requested by John Q. Anderson in [an October 2009 letter](#), NERC staff is to alert the Trustees when it believes a compliance risk has been increased, and the Trustees were so alerted in this case.

Now that it has been adopted by the BOT, the COM-002-2 interpretation will proceed to regulatory filing. During their deliberations, the Trustees recognized the reliability gap their decision creates and instructed the SC to raise the priority on the existing work on COM-003-1 under Project 2007-02. NERC staff was also directed to develop a best practices memorandum to share with the industry.