

Comment Form — 1st Draft of SAR for Operating Personnel Communications Protocols

Please use this form to submit comments on the proposed SAR for Operating Personnel Communications Protocols. Comments must be submitted by **April 17, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.net with the abbreviation "Protocols" in the subject line. If you have questions please contact **Harry Tom** at Harry.Tom@nerc.net or by telephone at 609-452-8060.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
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NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 — RTOs, ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 - Regional Reliability Organizations and Regional Entities

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Background Information

The need for improved real-time communications protocols was identified during the investigation of the August 2003 Blackout. Blackout Recommendation #26 is: "Tighten communications protocols, especially for communications during alerts and emergencies. Upgrade communication system hardware where appropriate." (Note that this SAR does not include the second part of this recommendation regarding the upgrade to communication system hardware.)

This SAR proposes developing a set of standardized communication protocols for system operators to use during normal and emergency operations to improve situational awareness and shorten response time.

The requirements for communications protocols may be developed and then distributed to relevant standards and/or may be developed and retained in one or more specialized standards.

Please review the SAR and then answer the questions on the following page.

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You do not have to answer all questions.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. **Do you believe that there is a reliability-related need to establish a set of communications protocols to improve situational awareness and shorten response time?**

Yes

No

If "No," please explain why in the comment area below and provide supporting information.

Comments:

2. **Do you agree with the scope of the proposed standard?**

Yes

No

If "No," please explain why in the comment area below and provide supporting information.

Comments: The scope of the SAR is too broad and too prescriptive. The Applicability section of the SAR where it states "... the protocol shall define a rigorous script for the Sender and Receiver of information..." is too prescriptive yet not exhaustive enough to cover all situations. We support the notion of defining standard terms to be used in operation personnel communication, but do not believe predetermined script is required in every communication situation, nor do we think it is possible to have a set of scripts that covers all possible cases.

3. **The proposed standard will be applicable to Transmission Operators, Balancing Authorities, Reliability Coordinators, Generator Operators and Distribution Providers. Do you agree with the proposed applicability?**

Yes

No

If "No," please explain why in the comment area below and provide supporting information.

Comments:

4. **The SAR includes a list of standards that include requirements that involve the issuing or receipt of real-time communications. If you are aware of additional requirements, beyond those listed on pages 8-9, please identify them here.**

The following list of requirements involves the issuing or receipt of real-time communications:

Comments:

5. **Please provide any other comments (that you have not already provided in response to the first four questions on this form) that you have on the revised SAR.**

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