COM-002-4 R1 R2 R3 R4 R5 R6 R7

Reliability Objective

To improve communications for the issuance of Operating Instructions, the entity implements predefined communications protocols that reduce the likelihood of miscommunication that could lead to action or inaction harmful to the reliability of the Bulk Electric System (BES).

WECC Intent

The potential failure points and guidance questions give general direction to registered entities for assessing risk while designing internal controls specific to NERC Reliability Standards and Requirements. The Registered Entity may use this document as a starting point to determine entity risk and it is not WECC's intent to establish a standard or baseline for entity risk assessment or controls design.

Note: Guidance Questions help an entity understand and document its controls. Any responses, including lack of affirmative feedback, will have no effect on an entity's demonstration of compliance at audit.

*Please send feedback to ICE@WECC.org with suggestions on Potential Failure Points & Guidance Questions.

Potential Failure Points/Guidance Questions

COM-002-4 R1

Potential Failure Point (R1): Failure to develop a policy requiring a documented communications protocols for its operating personnel that issue and receive Operating Instructions.

1. How has your entity established policy requiring use of communications protocols for its operating personnel that issue and receive Operating Instructions?

Potential Failure Point (R1): Failure to develop a process to identify operating personnel that issue and receive Operating Instructions.

1. How has your entity identified the operating personnel who issue and receive Operating Instructions?

Potential Failure Point (R1): Failure to develop a procedure on how to document communications protocols.

1. How does your entity document the communications protocols?
2. How does your entity protocol documentation ensured it outline all the minimum criterion as required by sub-part of R1?
3. How are they maintained?

Potential Failure Point (R1): Failure to identify the instances that require time identification when issuing an oral or written Operating Instruction.

1. How has your entity specified instances that require time identification when issuing an oral or written Operating Instruction?

Potential Failure Point (R1): Failure to develop or specify the nomenclature for Transmission Interface Elements and Transmission interface Facilities to be used when issuing an oral or written Operating Instruction.

1. How has your entity developed or specified the nomenclature for Transmission Interface Elements and Transmission interface Facilities

COM-002-4 R2

Potential Failure Point (R2): Failure to develop a policy/procedure that requires operating personnel take training.

1. How are employees aware of the policy/procedure?

Potential Failure Point (R2): Failure to develop a process to identify what activities personnel might perform to change or preserve the state, status, output, or input of an Element of the Bulk Electric System or Facility of the Bulk Electric System and could result in issuing an Operating Instruction.

Potential Failure Point (R2): Failure to develop a procedure on how to document communications protocols.

1. How are communications protocols documented?
2. How are they maintained?

Potential Failure Point (R2): Failure to develop a process to identify operating personnel responsible for Real-time operation.

1. What is your process to identify which new hires who might be subject to this requirement?
2. What is your process to ensure that existing personnel are identified for training?
   a. What about internal transfers from one role to another?

Potential Failure Point (R2): Failure to develop a process to know or track personnel training status.

1. How are operating personnel statuses tracked to ensure initial training occurs prior to issuance of instructions?
   a. How is training scheduled?
   b. What method is used to deliver training?
   c. If training is not completed as scheduled, how do you ensure it is rescheduled.

COM-002-4 R3

Potential Failure Point (R3): Failure to develop a policy/procedure that requires operating personnel take training.
1. How are employees aware of the policy/procedure?

Potential Failure Point (R3): Failure develop a process to identify what activities personnel might perform to change or preserve the state, status, output, or input of an Element of the Bulk Electric System or Facility of the Bulk Electric System and could result in issuing an Operating Instruction.

1. How has entity identified these activities?
2. How are these activities documented?

Potential Failure Point (R3): Failure to develop a process to identify operating personnel who can receive an oral two-party, person-to-person Operating Instruction.

1. What is your process to identify which new hires who might be subject to this requirement?
2. What is your process to ensure that existing personnel are identified for training?
   a. What about internal transfers from one role to another?

Potential Failure Point (R3): Failure to develop guidelines on how operators are to respond to Operating Instructions.

1. How do operators understand guidelines for receiving operating instructions?
2. How does your entity ensure the guidelines are followed?

3. How does your entity verify that guidelines have been followed?

Potential Failure Point (R3): Failure to develop a method of tracking personnel training status.

1. How is the training status of operating personnel tracked to ensure initial training occurs prior to receipt of operating instructions?
    a. How is training scheduled?
    b. What method is used to deliver training?
    c. If training is not completed as scheduled, how do you ensure it is rescheduled.

COM-002-4 R4

Potential Failure Point (R4): Failure to develop a standardized process for assessing adherence.

1. How does your entity defined criterion used to determine adherence?
1. How does your entity ensure assessments are performed consistently?
2. Does your entity have any documented criteria for determining when deviations have occurred?
    a. Is there a review of these determinations?

Potential Failure Point (R4): Failure to clearly define or communicate start/end dates used to establish timeframe(s) for assessments.

1. How do you ensure that an assessment of the documented communications protocols is scheduled to occur at least once every 12-calendar months?
2. Is there any form of notification if the 12-calendar month period is near or past due?

Potential Failure Point (R4.1): Failure to develop a method for providing feedback to operating personnel.

1. How is feedback documented?

Potential Failure Point (R4.1): Failure to define what corrective actions are to be taken.

1. How is appropriateness and necessity of corrective actions determined?
1. If corrective action is deemed necessary, are those corrective activities pre-defined or are the determined on a case-by-case basis.
2. How are corrective actions documented?
    a. How are corrective activities tracked to completion?

Potential Failure Point (R4.2): Failure to develop a method to assess effectiveness.

1. Describe your process for assessing the effectiveness of the documented communications protocols.
    a. Are there pre-defined criteria for assessing effectiveness?
2. How does your entity ensure that the effectiveness assessment is scheduled to occur at least once every 12 calendar months?
    a. Is there any form of notification if the 12-calendar month period is near or past due?

Potential Failure Point (R4.2): Failure to develop a method for modifying documented communications protocols.

1. Does your entity have any documented criteria for determining when modifications to the documented communication protocols may be needed?
2. How are users of the documented communications protocols informed of updates?

COM-002-4 R5, R6, R7

Potential Failure Point (R5, R6): Failure to define rules or protocols that guide operators to make decisions that achieve desired communications outcomes.

1. How does your entity document these rules or protocols?

Potential Failure Point (R7): Failure to develop a procedure on how verifications/confirmations are to be conducted.

1. How does your entity document verifications/confirmations?