

PJM Compliance Bulletin

CB024, COM-001-3 – Interpersonal Communications Capability

General

NERC Standard COM-001-3 was written to ensure adequate Interpersonal Communication capabilities necessary to maintain reliability. PJM is issuing this document to clarify our notification expectations in the event that a PJM Transmission Owner (TO) detects a failure of its Interpersonal Communication capability that lasts 30 minutes or longer.

Background

Requirement 3 of COM-001-3 requires each Transmission Operator (TOP) to have Interpersonal Communication capability with a variety of different entities within its TOP area. In the event of a failure of Interpersonal Communication capability, Requirement 10 of COM-001-3 requires each Reliability Coordinator, Transmission Operator, and Balancing Authority to notify entities as identified in Requirements R1, R3, and R5, respectively within 60 minutes of the detection of a failure of its Interpersonal Communication capability that lasts 30 minutes or longer.

The assigned tasks in the TO/TOP Matrix for Requirement 10 are as follows:

1. Each Member TO shall notify PJM and, where applicable, TOs external to PJM, within 60 minutes of the detection of a failure of its Interpersonal Communication capability for voice communications that lasts 30 minutes or longer.
2. Each Member TO shall notify Distribution Providers (DP) and Generator Operators (GOP) within its area within 60 minutes of the detection of a failure of its Interpersonal Communication capability for voice communications that lasts 30 minutes or longer.

PJM System Operations Division employs multiple forms of voice communications that are available from both PJM control rooms (Valley Forge and Milford). Within each PJM control room site there are multiple levels of communication redundancy, including dedicated ring-downs, manual dial, business voice systems, cellular, All-Call, and facsimile communications. Likewise, PJM Member TOs employ multiple forms of voice communications with multiple levels of redundancy, for example, but not limited to, dedicated ring-downs, manual dial, business voice systems, cellular, and radio. All of these may, collectively, form the basis of a TO's Interpersonal Communication capability.

For this reason, PJM anticipates that Member TOs would be required to deploy the required notifications established in the assigned tasks for COM-001-3, Requirement 10 only in the event of a failure of *all* redundant voice communications that form the basis for the Member TOs Interpersonal Communication capability. A loss of a single element of that capability (e.g. manual dial) when the member has other forms of voice communications that it has designated as forming the basis of its Interpersonal Communication capability (e.g., cell phone) would not trigger the required notifications.



Additionally, COM-001-3 requires every TOP to designate an Alternative Interpersonal Communication capability with its Reliability Coordinator, each Balancing Authority within its Transmission Operator Area and each adjacent Transmission Operator, synchronously and asynchronously connected. In support of this, v14 of the TO-TOP Matrix goes on to state that “*Each Member TO shall designate an Alternative Interpersonal Communication capability for voice communications with PJM.*” PJM recognizes that for the vast majority of our member TOs, the required satellite phone (see PJM Manual 01 Section 4.2.1) will also be used as their designated Alternative Interpersonal Communication device. However, we are aware of a few, isolated areas where other types of communication systems provide superior reliability compared to a satellite phone. Member TOs will notify PJM of their Alternative Interpersonal Communication capability via e-mail to regional_compliance@pjm.com.

Conclusion

Compliance Bulletin 24 provides guidance to Member TOs by detailing the minimum notification requirements associated with NERC Standard COM-001 R10 and associated assigned tasks identified in the PJM TO/TOP Matrix. Specifically, that a ‘failure of its Interpersonal Communication capability’ is triggered when there is a **complete** failure of **all** of the redundant voice communications that form the basis of the TO’s (lasting 30 minutes or more).

Satellite phones are the default designated Alternative Interpersonal Communication device. Any member wishing to designate a different methodology should contact PJM using reliability_compliance@pjm.com.

Development History

Revision: 1	Date: 06/09/2020
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Approver:	Mike Del Viscio, Sr. Director, Compliance
Reason	New version of standard contains the same notification requirements of the previous version. Added allowance for cell phones as the member’s

	Alternative Interpersonal Communication capability. Updated text to improve clarity on Valley Forge and Milford role. Minor changes made for clarity and readability.
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Reason	New Compliance Bulletin