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Rev # 12	Procedure Owner: Manager, Control Room Operations	Valid Through: 06/28/2025	

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# References

1. M/LCC 13 - ISO and LCC Communication Practices

# **Procedure Background**

NERC Standard COM-002, Requirement R4, requires ISO-NE to assess adherence to its documented communications protocols by Control Room Operators that issue Operating Instructions, and to provide feedback to those operating personnel and take corrective action, as necessary, to address deviations from the documented protocols. ISO-NE's documented communication protocols that pertain to Operating Instructions are contained in M/LCC 13, ISO and LCC Communication Practices. These protocols include use of three-part communication whenever an Operating Instruction is issued by an ISO Control Room Operator. This CROP contains provisions for assessing and documenting adherence to M/LCC 13 communication for when Operating Instructions are issued. This process must include assessments of all Operating Instructions issued during times when ISO-NE is experiencing an Operating Emergency (as defined by M/LCC 13).

In addition, ISO-NE must also assess the effectiveness of the M/LCC 13 communications protocols for its operating personnel that issue Operating Instructions, and modify these protocols, as necessary.

From Glossary of Terms Used in NERC Reliability Standards

# **Operating Instruction**

A command by operating personnel responsible for the Real-time operation of the interconnected Bulk Electric System 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. (A discussion of general information and of potential options or alternatives to resolve Bulk Electric System operating concerns is not a command and is not considered an Operating Instruction.)

#### **Element**

Any electrical device with terminals that may be connected to other electrical devices such as a generator, transformer, circuit breaker, bus section, or transmission line. An Element may be comprised of one or more components.

## **Facility**

A set of electrical equipment that operates as a single Bulk Electric System **Element** (e.g., a line, a generator, a shunt compensator, transformer, etc.)

# Common Procedure Information

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- A. Any ISO-NE qualified Control Room Operator has the authority to take actions required to comply with NERC Reliability Standards. A qualified ISO-NE Control Room Operator has met the following requirements:
  - 1. Have and maintain a NERC certification at the RC level (per R.1 of PER-003-2)
  - 2. Applicable Requirements of PER-005-2
  - 3. Approved to cover a Control Room Operator shift position by the Manager, Control Room Operations
  - 4. Is proficient at the current qualified level.
- B. Real time operation is defined as the current hour and the current hour plus one.
- C. Future hours are those beyond real time operation.
- D. All verbal communications with Local Control Centers (LCC), neighboring Reliability Coordinators/Balancing Authorities (RC/BA), Designated Entities (DE), Demand Designated Entities (DDE) and/or SCADA centers shall be made on recorded phone lines unless otherwise noted.
- E. For all communications:
  - 1. Use the Basic Protocol for All Operational Communications as prescribed in M/LCC 13,
  - 2. Use 'ISO New England' or 'New England'. Refrain from using 'ISO',
  - 3. Use Asset ID's when communicating with DE/DDEs,
  - 4. Use three-part communication in all situations where its use will enhance communication.
- F. Primary responsibilities are stated for each step within the procedure, but any ISO Control Room Operator qualified at that position or higher can perform the step. The Primary Responsibility may be delegated to an Operator in a lower qualified position, but the responsibility for its completion remains with the identified individual.
- G. The use of "ensure" within this document means that a verification has been performed and if the item is not correct, corrective actions will be performed.

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# **Procedure**

#### Condition(s) to perform this section:

- Periodic review of Control Room Operator phone communications that occurred requiring the issuance of an Operating Instruction during times other than during an emergency.
- The Operations Shift Supervisor has issued an Operating Instruction.
- An IROL has been exceeded for  $\leq 20$  minutes.

# Section 1: Review, retrieval, and distribution of voice recording files

Step 1.1 Primary Responsibility: Operations Shift Supervisor

Review voice recording files using Control Room Voice Recording Retrieval Software.

#### Notes

Particular attention should be given to communications associated with unplanned events, such as IROL and SOL exceedances, generator losses, and transmission events.

Step 1.2 Primary Responsibility: Operations Shift Supervisor

Retrieve necessary voice recording files using Control Room Voice Recording Retrieval Software.

#### **Notes**

The retrieval should include:

- Any communication by the Operations Shift Supervisor where an Operating Instruction has been issued.
- All communications where an Operating Instruction has been issued during an IROL exceedance lasting ≤ 20 minutes.

Step 1.3 Primary Responsibility: Operations Shift Supervisor

E-mail selected files to the applicable Control Room Operator for self-assessment.

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• Voice recording files have been retrieved, sent to the applicable Operator, and require a self-assessment.

# **Section 2 : Self-assessment of voice recording**

Primary Responsibility: Any Control Room Operator Perform self-assessment of the voice recording file to determine the information necessary to log the assessment. **Instructions** The following information should be gathered from the evaluated call: □ Date and time of call ☐ Name and Position of Operator □ RC/BA, LCC, DE, or DDE being communicated with ■ Evaluate the following, as applicable: ☐ Did the Operator identify themselves properly, including name, location, and desk? ☐ Were Asset IDs used where applicable? ■ Was the communication clear, concise, and definitive? Did the evaluated call include an Operating Instruction issued or received by the Operator? If so, indicate whether or **NOT** the following M/LCC 13 communication protocols were adhered to, as applicable: ■ Was three-part communication adhered to? ☐ Was nomenclature for transmission interface elements and interfaces used correctly? Primary Responsibility: Any Control Room Operator **Step 2.2** Access the Control Room Event Log Server. **Instructions** From the "Logbook Explorer" menu: ☐ Access the "ALL LOGBOOKS" file; ☐ Choose the applicable "CR Voice Comm Assessment" logbook. Primary Responsibility: Any Control Room Operator **Step 2.3** 

# Create the applicable log entry.

#### **Instructions**

Use log entry: Comm with RC/BA, Comm with LCC, or Comm with DE/DDE as appropriate

Step 2.4 Primary Responsibility: Any Control Room Operator

Complete the Log Server Entry by entering the information gathered during the recording self-assessment, and add an appropriate comment describing the conversation.

# **Instructions**

Fill in all applicable Entry Fields and add a brief comment in the "Additional Comments" field describing the call.

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Step 2.5 Primary Responsibility: Any Control Room Operator

# Attach recording file to the Log Server Entry.

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Perform the following:

- ☐ Select the "Attachments" tab of the Log Server entry.
- ☐ Right click in the tab and select "Import an existing file..."
- ☐ Select the applicable recording file and select "Open"
- ☐ Enter an attachment name describing the file (ex. GHJ1 on regulation)
- ☐ Select "OK"

Step 2.6 Primary Responsibility: Operations Shift Supervisor

# **Condition(s) to perform this step:**

• The Operations Shift Supervisor has issued an Operating Instruction.

# E-mail Manager, Control Room Operations that the self-assessment needs to be reviewed.

## Notes

The Manager, Control Room Operations is responsible for the review and remediation of Operations Shift Supervisor Operating Instruction communications.

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Self-assessment of voice recordings has been performed and requires review.

# Section 3: Review of a voice recording self-assessment

Step 3.1 Primary Responsibility: Operations Shift Supervisor

**Access the Control Room Event Log Server.** 

# **Instructions**

From the "Logbook Explorer" menu:

- ☐ Access the "ALL LOGBOOKS" file;
- ☐ Choose the applicable "CR Voice Comm Assessment" logbook.

## Notes

Manager, Control Room Operations will review any Operations Shift Supervisor voice recording self-assessment.

Sten 3.2 Primary Responsibility: Operations Shift Supervisor

Review voice recordings and self-assessments to assess adherence to M/LCC 13 communication protocols.

## **Notes**

Manager, Control Room Operations will review any Operations Shift Supervisor voice recording self-assessment.

Step 3.3 Primary Responsibility: Operations Shift Supervisor

**Determine if remediation is necessary.** 

## **Instructions**

If remediation is required, proceed to <u>Section 5</u>.

#### **Notes**

Manager, Control Room Operations will review any Operations Shift Supervisor voice recording self-assessment.

Step 3.4 Primary Responsibility: Operations Shift Supervisor

#### Condition(s) to perform this step:

• No remediation is required.

Complete the log entry.

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• Event occurred requiring the issuance of an Operating Instruction during an Operating Emergency, as defined in M/LCC 13.

Section 4: Review, retrieval, and assessment of voice recordings during an Operating Emergency

Step 4.1 Primary Responsibility: Operations Shift Supervisor

Review voice recording files using Control Room Voice Recording Retrieval Software.

Instructions
Perform the following:
□ Review all communications during an Operating Emergency.
□ Perform the following Steps of Section 4 on all communications where Operating Instructions were issued.

Step 4.2 Primary Responsibility: Operations Shift Supervisor

Step 4.2 Primary Responsibility: Operations Shift Supervisor

Retrieve necessary voice recording files using Control Room Voice Recording Retrieval Software.

Step 4.3 Primary Responsibility: Operations Shift Supervisor

Perform an assessment of the voice recording file to determine the information necessary to log the assessment.

Instructions

The	e following information should be gathered from the evaluated call:
	Date and time of call
	Name and Position of Operator
	RC/BA, LCC, DE, or DDE being communicated with
	Evaluate the following, as applicable:
	☐ Did the Operator identify themselves properly, including name, location, and desk?
	☐ Were Asset IDs used where applicable?
	☐ Was the communication clear, concise, and definitive?
	Did the evaluated call include an Operating Instruction issued or received by the Operator? If so, indicate whether
	or <b>NOT</b> the following M/LCC 13 communication protocols were adhered to, as applicable:
	☐ Was three-part communication adhered to?
	Was nomenclature for transmission interface elements and interfaces used correctly?

Step 4.4 Primary Responsibility: Operations Shift Supervisor

Access the Control Room Event Log Server.

#### **Instructions**

From the "Logbook Explorer" menu:

- ☐ Access the "ALL LOGBOOKS" file;
- ☐ Choose the applicable "CR Voice Comm Assessment" logbook.

Step 4.5 Primary Responsibility: Operations Shift Supervisor

Create the applicable log entry.

#### **Instructions**

Use log entry: Comm with RC/BA, Comm with LCC, or Comm with DE/DDE as appropriate

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Step 4.6 Primary Responsibility: Operations Shift Supervisor

Complete the Log Server Entry by entering the information gathered during the recording self-assessment, and add an appropriate comment describing the conversation.

# **Instructions**

Fill in all applicable Entry Fields and add a brief comment in the "Additional Comments" field describing the call.

Step 4.7 Primary Responsibility: Operations Shift Supervisor

Mark the "Operating Instruction during an Operating Emergency" checkbox in the Control Room Event Log Server.

## **Instructions**

Refer to M/LCC 13 for a description of an Operating Emergency.

Step 4.8 Primary Responsibility: Operations Shift Supervisor

Attach recording file to the Log Server Entry.

# **Instructions**

Perform the following:

- ☐ Select the "Attachments" tab of the Log Server entry.
- ☐ Right click in the tab and select "Import an existing file..."
- ☐ Select the applicable recording file and select "Open"
- ☐ Enter an attachment name describing the file (ex. GHJ1 on regulation)
- ☐ Select "OK"

Step 4.9 Primary Responsibility: Operations Shift Supervisor

**Determine if remediation is necessary.** 

## **Instructions**

If remediation is required, proceed to <u>Section 5</u>.

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If remediation was determined to be required based on <u>Section 3</u> or <u>Section 4</u>.

## Section 5: Remediation and M/LCC 13 effectiveness review

## **Notes**

Manager, Control Room Operations will perform remediation for Operations Shift Supervisor.

Step 5.1 Primary Responsibility: Operations Shift Supervisor

Access the applicable log entry.

Step 5.2 Primary Responsibility: Operations Shift Supervisor

Mark the "Remediation Necessary" checkbox and enter a reason in the Control Room Event Log Server.

Step 5.3 Primary Responsibility: Operations Shift Supervisor

## Condition(s) to perform this step:

• Remediation is being performed based on a determination made in Section 4 of this procedure.

Indicate whether or NOT the non-adherence to communication protocols caused or contributed to ISO experiencing an Operating Emergency by marking the "Caused/Contributed to Emergency" checkbox in the Control Room Event Log Server.

Step 5.4 Primary Responsibility: Operations Shift Supervisor

Perform remediation with applicable Control Room Operator.

#### **Notes**

Manager, Control Room Operations will perform remediation of the Operations Shift Supervisors.

Step 5.5 Primary Responsibility: Operations Shift Supervisor

Enter the reason for remediation and action taken in the "Remediation Comment" field in the Control Room Event Log Sever.

Step 5.6 Primary Responsibility: Operations Shift Supervisor

Mark the "Remediation Complete" checkbox in the Control Room Event Log Server entry.

Step 5.7 Primary Responsibility: Operations Shift Supervisor

Review the failure to adhere to M/LCC 13 communication protocols to determine if failure was due, at least in part, to deficiencies of the M/LCC 13 procedure.

Step 5.8 Primary Responsibility: Operations Shift Supervisor

#### Condition(s) to perform this step:

Deficiencies in the M/LCC 13 communication protocols contributed to the failure to adhere to those protocols.

Perform the following to develop and document the recommended modifications to M/LCC 13

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Step 5.8.1 Primary Responsibility: Operations Shift Supervisor

Mark the "M/LCC 13 Modification Recommended" checkbox in the Control Room Event Log Server.

Step 5.8.2 Primary Responsibility: Operations Shift Supervisor

Enter recommended change to M/LCC 13 in the "Recommended change to M/LCC 13" text field in the Control Room Event Log Server.

Step 5.9 Primary Responsibility: Operations Shift Supervisor

Complete the log entry.

Step 5.10 Primary Responsibility: Operations Shift Supervisor

Document remediation and send an e-mail to the Manager, Control Room Operations.

## **Instructions**

The "CR Voice Comm Assessment" log entry provides all the required information. This can be copied and pasted in email.

Include the following:

- Operator remediated
- ☐ Reason for Remediation
- ☐ Actions taken to remediate
- ☐ Effectiveness of MLCC13
- ☐ Suggested changes to MLCC13 (if applicable)

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• A Voice Assessment Report needs to be executed to determine adherence to R4 of COM-002.

# **Section 6 : Voice Assessment Report**

## **Notes**

The Voice Assessment Report is run at least annually to address requirements of NERC Reliability Standard COM-002-4 R4

Step 6.1 Primary Responsibility: Manager, Control Room Operations

Request the Operations Shift Supervisor run the Voice Assessment report and provide the date range to use.

# **Notes**

This report is run at least annually to ensure all Control Room Operators that have issued an operating instruction have been assessed.

Step 6.2 Primary Responsibility: Operations Shift Supervisor

Access the Voice Assessment report tool.

#### Instructions

The Voice Assessment Report resides in the Control Room Share drive in the Excel Tools folder...

Step 6.3 Primary Responsibility: Operations Shift Supervisor

Run the Voice Assessment Report with the date range provided by the Manager, Control Room Operations.

## Notes

If the report will be saved, use "save as" to prevent saving over the macro enabled report.

Step 6.4 Primary Responsibility: Operations Shift Supervisor

E-mail the report to the Manager, Control Room Operations.

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# **Revision History**

MM/DD/YY) 04/30/13 04/14/15 11/05/15 06/20/16 01/12/17 06/14/17 03/12/18	Initial revision of this Procedure  Break into sections and add language for expansion of responsibly for review  Modify process for retrieving voice recordings.  Modify and add provisions to address requirements of NERC Standard COM-002-4 R4  Modify Steps 2.5 and 4.8  Administrative change for modification to procedure format  Added section to run Voice assessment report annually to address requirements of NERC Standard COM-002-4 R4; Added note to step 1.1 and 1.2 to include Operations Shift Supervisor operating instruction communications  Add further clarification of the role the Manager, Control Room Operations for review and remediation of Operations Shift Supervisor	Steven Gould
04/14/15 11/05/15 06/20/16 01/12/17 06/14/17 03/12/18	Break into sections and add language for expansion of responsibly for review  Modify process for retrieving voice recordings.  Modify and add provisions to address requirements of NERC Standard COM-002-4 R4  Modify Steps 2.5 and 4.8  Administrative change for modification to procedure format  Added section to run Voice assessment report annually to address requirements of NERC Standard COM-002-4 R4; Added note to step 1.1 and 1.2 to include Operations Shift Supervisor operating instruction communications  Add further clarification of the role the Manager, Control Room	Steven Gould Steven Gould Steven Gould Steven Gould Steven Gould Steven Gould
11/05/15 06/20/16 01/12/17 06/14/17 03/12/18	review  Modify process for retrieving voice recordings.  Modify and add provisions to address requirements of NERC Standard COM-002-4 R4  Modify Steps 2.5 and 4.8  Administrative change for modification to procedure format  Added section to run Voice assessment report annually to address requirements of NERC Standard COM-002-4 R4; Added note to step 1.1 and 1.2 to include Operations Shift Supervisor operating instruction communications  Add further clarification of the role the Manager, Control Room	Steven Gould Steven Gould Steven Gould Steven Gould Steven Gould
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03/12/18	Added section to run Voice assessment report annually to address requirements of NERC Standard COM-002-4 R4; Added note to step 1.1 and 1.2 to include Operations Shift Supervisor operating instruction communications  Add further clarification of the role the Manager, Control Room	Steven Gould
	requirements of NERC Standard COM-002-4 R4; Added note to step 1.1 and 1.2 to include Operations Shift Supervisor operating instruction communications  Add further clarification of the role the Manager, Control Room	
03/20/18		Steven Gould
	communications.	
08/06/18	Globally replaced "emergency condition" with "Operating Emergency" to be consistent with MLCC 13	Steven Gould
08/29/18	Added condition to enter for Section 1	Steven Gould
07/21/20	Periodic Review. Minor administrative changes.	Steven Gould
07/01/21	Added voice recording retrieval during IROL exceedances based on audit recommendations to Section 1; clarified assessments are to be performed for communications where Operating Instructions were issued in Section 4; reformatted the TOC.	Steven Gould
06/27/23	Periodic Review, Minor administrative changes	Jonathan Gravelin
	07/21/20 07/01/21	07/21/20 Periodic Review. Minor administrative changes. 07/01/21 Added voice recording retrieval during IROL exceedances based on audit recommendations to Section 1; clarified assessments are to be performed for communications where Operating Instructions were issued in Section 4; reformatted the TOC.