

Document title

# RCO Operational Communications

Document number

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Applies to: RCO Power Trading, RCO Portfolio Management, Progress Energy Carolinas, Progress Energy Florida

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## 1.0 Purpose

The purpose of this procedure is to establish processes for routine daily / hourly communications between RCO Power Trading Operations section and RCO Portfolio Management unit as they interact with Power System Operations personnel at the respective Energy Control Centers (ECCs).

The overriding obligation of employees is adherence to the FERC Standards of Conduct (SOC). See [REG-SUBS-00002](#) for more information regarding SOC compliance.

## 2.0 Responsibilities

- 2.1. Oversight- The unit managers of Portfolio Management and Real Time Trading shall review this procedure annually, or as necessary, to update this process with any changes. A manager must also approve any changes or exceptions to this procedure.
- 2.2. RCO Portfolio Management (PM) and RCO Power Trading Operations (PTO) personnel through the Unit Manager level are responsible for communicating with the appropriate Energy Control Center (ECC) personnel in compliance with this procedure and all aspects of the FERC Standard of Conduct.

## 3.0 Procedure

- 3.1 **Mediums** – RCO PM and RCO PTO personnel will utilize electronic mediums for routine daily / hourly communications with Power System Operations (PSO) personnel regarding routine operational issues for the seven (7) day forward planning window.
- 3.2 **Routine Operations (PTO)** – RCO PTO will utilize Enterprise Instant Messaging (IM) as the primary tool for daily / hourly communications with Power System Operations personnel to coordinate routine commercial and operational functions, including:
  - 3.2.1 Generating unit conditions
  - 3.2.2 Excess generation available for sale
  - 3.2.3 Economy purchase opportunities and availability
  - 3.2.4 Reliability purchase requirements
  - 3.2.5 Reliability sale requirements (i.e., for min load)
  - 3.2.6 Weather / load assumptions relevant to 3.2.2 – 3.2.5
  - 3.2.7 Unit dispatch assumptions relevant to 3.2.2 – 3.2.5
  - 3.2.8 Inter-Control Area energy transfer requirements (e.g., CPLW ? CPLE)
  - 3.2.9 Transmission purchases relevant to 3.2.8
  - 3.2.10 Excess transmission release for Marketing or Purchase Power usage (e.g., Broad River)

- 3.3 **Communication Prohibitions (PTO)** – Routine daily / hourly communications with Power System Operations personnel shall not include:
- 3.3.1 Specific market price information related to potential sales opportunities. (This is to avoid the potential for implied pressure for preferential treatment related to sales.)
  - 3.3.2 Transmission system conditions.
  - 3.3.3 Conditions of generation assets owned by Network Service Customers for whom RCO is not the marketing agent.

- 3.4 **Routine Operations (PM)** – RCO PM will utilize IM, emails and standard web based reporting as the primary mediums to coordinate routine daily / hourly commercial and operational information for the seven (7) day forward planning window, including:

- 3.4.1 Load
- 3.4.2 Unit commitment / dispatch forecast
- 3.4.3 Generator constraint scheduling (e.g., maintenance, testing, etc.)
- 3.4.4 Fuel burn projections
- 3.4.5 Fuel nominations / alert levels / restrictions
- 3.4.6 Daily / hourly interchange schedules
- 3.4.7 Unit cycle list

- 3.5 **Document Retention** – All Instant Messages and emails between RCO PM and RCO PTO with Power System Operations or Transmission Services personnel will be archived and retained for a period of three (3) years. RCO PTO and RCO PM personnel shall maintain all emails exchanged with ECC Power System Operations by one of the following options (until an automated means to archive such email is established):

- 3.5.1 Store such emails (with attachments) in a searchable email folder (preferred), or,
- 3.5.2 Storage of hard copies of applicable emails and attachments.

Non-electronic (phone or meeting) communications [not related to the seven (7) day forward planning window] will be documented and maintained in electronic format in a searchable folder, or in hard copy, for a period of three (3) years.

- 3.6 **Non-routine Operations** – RCO PM and RCO PTO may communicate with ECC personnel telephonically to formalize plans for the seven (7) day forward planning window as warranted by extraordinary operational considerations, including but not limited to, the following situations:

- 3.6.1.1 Unscheduled generating unit outages
- 3.6.1.2 Fuel supply deviations as a result of load, fuel transportation, or system requirements
- 3.6.1.3 Unit commitment plans during abnormal load conditions such as peak loads, minimum loads, major storms, etc.
- 3.6.1.4 Reliability power purchase requests during generating capacity deficiency situations
- 3.6.1.5 Reliability power sale requests during minimum control margin conditions
- 3.6.1.6 Failure of electronic media to facilitate ordinary operational daily / hourly communications

**NOTE: These events are not to be construed as deviations from or suspension of the Standards of Conduct unless explicitly identified as such by the respective ECC.**

**NOTE: All telephone calls discussing the above situations will be recorded and notice of such calls will be posted by the respective Energy Control Center on the utility's OASIS site within 24 hours.**

### 3.7 Exceptions to the OASIS Posting Requirements

3.7.1 **Communications Outside the 7 Day Forward Planning Window** – RCO PM and RCO PTO may communicate with ECC personnel telephonically or in meetings to discuss subject matter outside of the 7 day forward planning window. This communication must strictly adhere to the FERC Standards of Conduct (SOC). All phone calls will be documented to indicate date and time of phone call, call participants, subject matter discussed, and appropriate commentary. Where feasible, written agendas should be prepared in advance of the call or meeting. The documentation will be archived and retained per the Document Retention section 3.5. Examples of subject matter for discussion are as follows:

- 3.7.1.1 Maintenance scheduling beyond the 7 day forward window
- 3.7.1.2 Planning process or procedure improvements
- 3.7.1.3 Personnel issues
- 3.7.1.4 Operations lessons learned (e.g., post-analysis)
- 3.7.1.5 Software, applications, information systems improvements and problem resolution

**NOTE: These events are not to be construed as deviations from or suspension of the Standards of Conduct unless explicitly identified as such by the respective ECC. Any such communications suspending the Standards of Conduct shall be posted by the respective Energy Control Center on the utility's OASIS site within 24 hours in a manner consistent with 18 C.F.R. §358.4(a)(2)(2004).**

3.7.2 **Transmission Provider Communications** – OASIS is the primary tool for communication regarding transmission requests. However, telephonic communications with the Transmission Services function at the ECC are permissible to resolve issues pertaining to routine interchange. Such situations include:

- 3.7.2.1 Electronic tag denial clarifications
- 3.7.2.2 OASIS request denial clarifications
- 3.7.2.3 OASIS malfunction notifications