

Comment Report

Project Name:	2017-02 Modifications to Personnel Performance, Training, and Qualifications Standards PER-003-2 and Implementation Plan
Comment Period Start Date:	1/22/2018
Comment Period End Date:	3/7/2018
Associated Ballots:	2017-02 Modifications to Performance, Training, and Qualifications Standards Implementation Plan IN 1 OT 2017-02 Modifications to Performance, Training, and Qualifications Standards PER-003-2 IN 1 ST

There were 30 sets of responses, including comments from approximately 97 different people from approximately 76 companies representing 10 of the Industry Segments as shown in the table on the following pages.

Questions

1. The SDT added a clarifying footnote to all of the requirements in PER-003-1. The PRT is suggesting that the footnote state the following: "The NERC certificates referenced in this standard pertain to those certificates identified in the NERC System Operator Certification Program Manual." Do you agree that this footnote would provide the necessary clarity? If not, please explain in the comment area below.

2. The SDT has written the implementation plan to retire PER-004-2. Do you agree that this standard should be retired? If not, please explain in the comment area below.

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
Portland General Electric Co.	Angela Gaines	3	WECC	PGE - Group 1	Angela Gaines	Portland General Electric Company	3	WECC
					Barbara Croas	Portland General Electric Company	5	WECC
					Scott Smith	Portland General Electric Company	1	WECC
					Adam Menendez	Portland General Electric Company	6	WECC
Duke Energy	Colby Bellville	1,3,5,6	FRCC,RF,SERC	Duke Energy	Doug Hils	Duke Energy	1	RF
					Lee Schuster	Duke Energy	3	FRCC
					Dale Goodwine	Duke Energy	5	SERC
					Greg Cecil	Duke Energy	6	RF
DTE Energy - Detroit Edison Company	Jeffrey DePriest	5		DTE Electric	Karie Barczak	DTE Energy - Detroit Edison Company	3	RF
					Daniel Herring	DTE Energy - Detroit Edison Company	4	RF
California ISO	Richard Vine	2		ISO/RTO Council Standards Review Committee	Ali Miremadi	California ISO	2	WECC
					Greg Campoli	NYISO	2	NPCC
					Kathleen Goodman	ISONE	2	NPCC
					Nathan Bigbee	ERCOT	2	Texas RE
					Terry Bilke	MISO	2	MRO
					Ben Li	IESO	2	NPCC
					Mark Holman	PJM	2	RF
					Charles Yeung	SPP	2	SPP RE
Northeast Power	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	RSC no ISO-NE	Guy V. Zito	Northeast Power	10	NPCC

Coordinating
Council

	Coordinating Council		
Randy MacDonald	New Brunswick Power	2	NPCC
Wayne Sipperly	New York Power Authority	4	NPCC
Glen Smith	Entergy Services	4	NPCC
Brian Robinson	Utility Services	5	NPCC
Bruce Metruck	New York Power Authority	6	NPCC
Alan Adamson	New York State Reliability Council	7	NPCC
Edward Bedder	Orange & Rockland Utilities	1	NPCC
David Burke	Orange & Rockland Utilities	3	NPCC
Michele Tondalo	UI	1	NPCC
Laura Mcleod	NB Power	1	NPCC
David Ramkalawan	Ontario Power Generation Inc.	5	NPCC
Quintin Lee	Eversource Energy	1	NPCC
Paul Malozewski	Hydro One Networks, Inc.	3	NPCC
Helen Lainis	IESO	2	NPCC
Michael Schiafone	National Grid	1	NPCC
Michael Jones	National Grid	3	NPCC
Greg Campoli	NYISO	2	NPCC
Silvia Mitchell	NextEra Energy - Florida Power and Light Co.	6	NPCC

					Michael Forte	Con Ed - Consolidated Edison	1	NPCC
					Daniel Grinkevich	Con Ed - Consolidated Edison Co. of New York	1	NPCC
					Peter Yost	Con Ed - Consolidated Edison Co. of New York	3	NPCC
					Brian O'Boyle	Con Ed - Consolidated Edison	5	NPCC
					Sean Cavote	PSEG	4	NPCC
					Sean Bodkin	Dominion - Dominion Resources, Inc.	6	NPCC
					Sylvain Clermont	Hydro Quebec	1	NPCC
					Chantal Mazza	Hydro Quebec	2	NPCC
Midwest Reliability Organization	Russel Mountjoy	10		MRO NSRF	Joseph DePoorter	Madison Gas & Electric	3,4,5,6	MRO
					Larry Heckert	Alliant Energy	4	MRO
					Amy Casucelli	Xcel Energy	1,3,5,6	MRO
					Michael Brytowski	Great River Energy	1,3,5,6	MRO
					Jodi Jensen	Western Area Power Administratino	1,6	MRO
					Kayleigh Wilkerson	Lincoln Electric System	1,3,5,6	MRO
					Mahmood Safi	Omaha Public Power District	1,3,5,6	MRO
					Brad Parret	Minnesota Power	1,5	MRO
					Terry Harbour	MidAmerican Energy Company	1,3	MRO
					Tom Breene	Wisconsin Public Service	3,5,6	MRO
					Jeremy Volls	Basin Electric Power Coop	1	MRO

					Kevin Lyons	Central Iowa Power Cooperative	1	MRO
					Mike Morrow	Midcontinent Independent System Operator	2	MRO
Southwest Power Pool, Inc. (RTO)	Shannon Mickens	2	SPP RE	SPP Standards Review Group	Shannon Mickens	Southwest Power Pool Inc.	2	SPP RE
					Don Schmit	Nebraska Public Power District	5	SPP RE
					Deborah McEndaffer	Midwest Energy, Inc	NA - Not Applicable	SPP RE
					Mike Kidwell	Empire District Electric Company	1,3,5	SPP RE
					Michelle Corley	Cleco Corporation	3	SPP RE
					Bobby Gray	Board of Public Utilities (BPU) kanas	3	SPP RE
					Robert Hirschak	Cleco Corporation	6	SPP RE
					Tara Lightner	Sunflower Electric Power Corporation	1	SPP RE
					J. Scott Williams	City Utilities of Springfield, MO	1,4	SPP RE
					Kevin Giles	Westar Energy	1	SPP RE

1. The SDT added a clarifying footnote to all of the requirements in PER-003-1. The PRT is suggesting that the footnote state the following: “The NERC certificates referenced in this standard pertain to those certificates identified in the NERC System Operator Certification Program Manual.” Do you agree that this footnote would provide the necessary clarity? If not, please explain in the comment area below.

Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1

Answer No

Document Name

Comment

The clarification should be made in the NERC Glossary of Terms. The use of footnotes to define the terminology could result in different Standards being interpreted differently base on footnoting. Standards may eventually begin to conflict based on how different terms are used in specific context. Though not a major issue for the current project it sets a precedent that opens the door to problems down the road.

Likes 0

Dislikes 0

Response

Aimee Harris - NiSource - Northern Indiana Public Service Co. - 3

Answer No

Document Name

Comment

Adding a footnote to PER-003 to reference the certification program is short sightedness from the Standards Drafting Team. The key words in this standard as well as many others is "System Operator". It would be better to redo the System Operator definition in the NERC Glossary of Terms to include "a NERC certified individual" and add the reference to the NERC System Operator Certification Program Manual.

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 5

Answer No

Document Name

Comment

As stated in our previous comments related to Project 2016-EPR-01, AEP believes the standard as currently written is sufficiently clear in this regard. The current version of the standard states that its purpose is “to ensure that System Operators performing the reliability-related tasks of the

Reliability Coordinator, Balancing Authority and Transmission Operator are certified through the NERC System Operator Certification Program when filling a Real-time operating position responsible for control of the Bulk Electric System.” This, coupled with the references to “NERC Reliability Operator certificate” within the requirements themselves, provides a clear and direct correlation to the certification specified within the NERC System Operator Certification Program Manual. As a result, we see no lack of clarity within the standard. While AEP does not entirely object to the concept of explicitly referencing the SOC Program Manual in the requirements of PER-003-1, extreme care should be taken to ensure that additional obligations are not unintentionally implied by generally referring to the entire manual as a whole.

In response to our previously submitted comments, the drafting team states in their July 2017 consideration of comments document that “The intent of the SAR DT is not to expand the standard to reflect anything more than the certifications referenced in the NERC System Operator Certification Program Manual not the manual in its entirety.” While we are sure it is not the drafting team’s intent that additional obligations be implied, that risk nonetheless remains (say perhaps, when read by an auditor). While AEP does not believe that the proposed clarifying language and footnote is needed, if one is indeed pursued, we suggest instead using “*The NERC certificates **certified credentials** referenced in this standard pertain to those certificates identified in the NERC System Operator Certification Program Manual.*”

Likes 0

Dislikes 0

Response

Neil Swearingen - Salt River Project - 1,3,5,6 - WECC

Answer

No

Document Name

Comment

SRP believes the current standard does not require additional clarification as to the type of certification required. However, SRP does not have concerns with adding the proposed footnote.

Likes 0

Dislikes 0

Response

Theresa Allard - Minnkota Power Cooperative Inc. - 1

Answer

No

Document Name

Comment

Minnkota would like to sign on the the NERC Standards Review Forum comments as follows:

The NSRF agrees with the additional foot note but disagrees with the Areas of Competency in R1, R2 and R3. RCs, BAs and TOPs have no control over the Areas of Competency within a NERC Certificate exam. The exam is based on other mechanisms (the PCGC) that BAs, TOPs and RCs have no control over. Is “minimum competency” passing the NERC exam? Entities cannot prove that a System Operator passed with minimum

competency, the components under past 1.1, 2.1, and 3.1. The written Measures do not indicate what level of “minimum competency” only that NERC certificate (or NERC number) is required. The Areas of Competency do not support the reliability BES and is a legacy issue from years ago. The Areas of Competency are strictly within a test that Registered Entities have no control over. The NSRF recommends that the Areas of Competency within R1, R2 and R3 be removed since this Project is currently active. The NSRF agrees that no one has been found non-compliant and this is a simple item to satisfy during an audit. But we are looking to gain efficiencies everywhere we can, and this is some low hanging fruit that can be corrected with a simple stroke of the SDT pen. The NSRF agrees that NERC Certification is required for RCs, TOPs and BAs and do not wish for this Standard to be retired (PER-003-1). There is a current NERC Certification survey that asks many questions about NERC Certification. That is being attributed to the PCGC and not this SDT. The SDT has the power to gain one more efficiency for the Applicable Entities of PER-003-1. The NSRF recommends that the Areas of Competency within R1, R2 and R3 be removed since this Project is currently active. If the SDT does not move forward with this request, than time, resources and valuable funding will be wasted on opening another Project to address this simple concern.

Likes 0

Dislikes 0

Response

Larry Heckert - Alliant Energy Corporation Services, Inc. - 4

Answer

No

Document Name

Comment

Alliant Energy supports the following comments from the MRO NSRF:

The NSRF agrees with the additional foot note but disagrees with the Areas of Competency in R1, R2 and R3. RCs, BAs and TOPs have no control over the Areas of Competency within a NERC Certificate exam. The exam is based on other mechanisms (the PCGC) that BAs, TOPs and RCs have no control over. Is “minimum competency” passing the NERC exam? Entities cannot prove that a System Operator passed with minimum competency, the components under past 1.1, 2.1, and 3.1. The written Measures do not indicate what level of “minimum competency” only that NERC certificate (or NERC number) is required. The Areas of Competency do not support the reliability BES and is a legacy issue from years ago. The Areas of Competency are strictly within a test that Registered Entities have no control over. The NSRF recommends that the Areas of Competency within R1, R2 and R3 be removed since this Project is currently active. The NSRF agrees that no one has been found non-compliant and this is a simple item to satisfy during an audit. But we are looking to gain efficiencies everywhere we can, and this is some low hanging fruit that can be corrected with a simple stroke of the SDT pen. The NSRF agrees that NERC Certification is required for RCs, TOPs and BAs and do not wish for this Standard to be retired (PER-003-1). There is a current NERC Certification survey that asks many questions about NERC Certification. That is being attributed to the PCGC and not this SDT. The SDT has the power to gain one more efficiency for the Applicable Entities of PER-003-1. The NSRF recommends that the Areas of Competency within R1, R2 and R3 be removed since this Project is currently active. If the SDT does not move forward with this request, then time, resources and valuable funding will be wasted on opening another Project to address this simple concern.

Likes 0

Dislikes 0

Response

Russel Mountjoy - Midwest Reliability Organization - 10, Group Name MRO NSRF

Answer

No

Document Name

Comment

The NSRF agrees with the additional foot note but disagrees with the Areas of Competency in R1, R2 and R3. RCs, BAs and TOPs have no control over the Areas of Competency within a NERC Certificate exam. The exam is based on other mechanisms (the PCGC) that BAs, TOPs and RCs have no control over. Is “minimum competency” passing the NERC exam? Entities cannot prove that a System Operator passed with minimum competency, the components under past 1.1, 2.1, and 3.1. The written Measures do not indicate what level of “minimum competency” only that NERC certificate (or NERC number) is required. The Areas of Competency do not support the reliability BES and is a legacy issue from years ago. The Areas of Competency are strictly within a test that Registered Entities have no control over. The NSRF recommends that the Areas of Competency within R1, R2 and R3 be removed since this Project is currently active. The NSRF agrees that no one has been found non-compliant and this is a simple item to satisfy during an audit. But we are looking to gain efficiencies everywhere we can, and this is some low hanging fruit that can be corrected with a simple stroke of the SDT pen. The NSRF agrees that NERC Certification is required for RCs, TOPs and BAs and do not wish for this Standard to be retired (PER-003-1). There is a current NERC Certification survey that asks many questions about NERC Certification. That is being attributed to the PCGC and not this SDT. The SDT has the power to gain one more efficiency for the Applicable Entities of PER-003-1. The NSRF recommends that the Areas of Competency within R1, R2 and R3 be removed since this Project is currently active. If the SDT does not move forward with this request, than time, resources and valuable funding will be wasted on opening another Project to address this simple concern.

Likes 0

Dislikes 0

Response**Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC****Answer**

Yes

Document Name**Comment**

changes are minor for TOP's and just add clarification with a new “footnote”

Likes 0

Dislikes 0

Response**Angela Gaines - Portland General Electric Co. - 3, Group Name PGE - Group 1****Answer**

Yes

Document Name**Comment**

The footnote does provide clarity in regards to the specification of what certificates are being addressed.

However, PGE has concerns regarding the referencing of documents, in this case a manual, in a footnote, that is controlled outside of the Standard Development process.

Likes 0

Dislikes 0

Response

Kristine Ward - Seminole Electric Cooperative, Inc. - 1,3,4,5,6 - FRCC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Laurie Williams - PNM Resources - Public Service Company of New Mexico - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Sandra Shaffer - Berkshire Hathaway - PacifiCorp - 6

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Michelle Amarantos - APS - Arizona Public Service Co. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jeffrey DePriest - DTE Energy - Detroit Edison Company - 5, Group Name DTE Electric	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Douglas Johnson - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

Tammy Porter - Tammy Porter On Behalf of: Lee Maurer, Oncor Electric Delivery, 1; - Tammy Porter

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Laura Nelson - IDACORP - Idaho Power Company - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Preston Walker - PJM Interconnection, L.L.C. - 2 - SERC,RF

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Aubrey Short - FirstEnergy - FirstEnergy Corporation - 4

Answer Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Leonard Kula - Independent Electricity System Operator - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Richard Vine - California ISO - 2, Group Name ISO/RTO Council Standards Review Committee	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

David Ramkalawan - Ontario Power Generation Inc. - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Hien Ho - Tacoma Public Utilities (Tacoma, WA) - 4

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no ISO-NE

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Colleen Campbell - ACES Power Marketing - 6 - NA - Not Applicable

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Robert Kondziolka - Salt River Project - 3

Answer

Document Name

Comment

I support the comments submitted by Salt River Project.

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Document Name

Comment

Texas RE does not have comments on this question.

Likes 0

Dislikes 0

Response

2. The SDT has written the implementation plan to retire PER-004-2. Do you agree that his standard should be retired? If not, please explain in the comment area below.

Neil Swearingen - Salt River Project - 1,3,5,6 - WECC

Answer No

Document Name

Comment

SRP believes in order to retire PER-004-2 R2, language should be incorporated into the proposed PER-003-2 requiring each RC to staff their Real-Time operations 24 hrs/day.

Likes 0

Dislikes 0

Response

Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1

Answer No

Document Name

Comment

In reviewing the arguments for retirement of PER-004 we are not sure the issue of 24 hours staffing is adequately addressed in the other cited standards. Other standards address "Reliability Coordinator" as an entity, not "Reliability Coordinator Operating Personnel". We believe the drafting team has good reason to retire PER-004-2, and the argument seems intuitive; however, due to enhanced technology, removing the staffing requirements could introduce arguments that 24 X 7 staffing is not required by the standards. It could be further argued that certain activities do not need Certified Operating Personnel oversight because they are automated. Since Reliability Standards have been made mandatory there have been continuous arguments over business authority, Entity v. Operating Personnel, who specifically needs to be certified, and who determines staffing.

Likes 0

Dislikes 0

Response

Colleen Campbell - ACES Power Marketing - 6 - NA - Not Applicable

Answer Yes

Document Name

Comment

We thank you for the opportunity to comment.

Likes 0

Dislikes 0

Response

Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

changes are minor for TOP's and just add clarification with a new "footnote"

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no ISO-NE

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Hien Ho - Tacoma Public Utilities (Tacoma, WA) - 4

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

David Ramkalawan - Ontario Power Generation Inc. - 5

Answer	Yes
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Document Name	
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Comment

Likes 0

Dislikes 0

Response

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group

Answer	Yes
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Document Name	
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Comment

Likes 0

Dislikes 0

Response

Russel Mountjoy - Midwest Reliability Organization - 10, Group Name MRO NSRF

Answer	Yes
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Document Name	
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Comment

Likes 0

Dislikes 0

Response

Larry Heckert - Alliant Energy Corporation Services, Inc. - 4

Answer	Yes
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Document Name	
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Comment

Likes 0

Dislikes 0

Response

Richard Vine - California ISO - 2, Group Name ISO/RTO Council Standards Review Committee

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Leonard Kula - Independent Electricity System Operator - 2

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Aubrey Short - FirstEnergy - FirstEnergy Corporation - 4

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Preston Walker - PJM Interconnection, L.L.C. - 2 - SERC,RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Laura Nelson - IDACORP - Idaho Power Company - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Douglas Johnson - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

Jeffrey DePriest - DTE Energy - Detroit Edison Company - 5, Group Name DTE Electric

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Theresa Allard - Minnkota Power Cooperative Inc. - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Michelle Amarantos - APS - Arizona Public Service Co. - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Sandra Shaffer - Berkshire Hathaway - PacifiCorp - 6

Answer Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Aimee Harris - NiSource - Northern Indiana Public Service Co. - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Laurie Williams - PNM Resources - Public Service Company of New Mexico - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Kristine Ward - Seminole Electric Cooperative, Inc. - 1,3,4,5,6 - FRCC	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0

Response	
Tammy Porter - Tammy Porter On Behalf of: Lee Maurer, Oncor Electric Delivery, 1; - Tammy Porter	
Answer	
Document Name	
Comment	
N/A	
Likes	0
Dislikes	0

Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	
Document Name	
Comment	
<p>Texas RE appreciates the Standard Drafting Team’s (SDT) efforts to implement the Enhanced Periodic Review (EPR) team’s recommendations. Texas RE recognizes that there is significant overlap between PER-004-2 and other training Standards, including PER-003 and PER-005. However, Texas RE remains concerned that retiring PER-004-2 R1 could introduce unnecessary ambiguity. Specifically, while other PER and IRO requirements cited by the EPR team as overlapping with PER-004-2 R1 contain similar elements, they do not appear to be as explicit regarding NERC-certification requirements and the adequacy of training in connection with those requirements as existing PER-004-2 R1, which is proposed for retirement.</p> <p>As noted in its response, the SDT relies on PER-003-1 R1 and PER-005-2 R1 to address training issues. While both standards address aspects of training, neither provide an unambiguous obligation for applicable entities to provide adequate training to their personnel in all circumstances. For instance, PER-003-1 R1 provides that “Real-time operating positions performing Reliability Coordinator reliability-related tasks with System Operators</p>	

who have demonstrated *minimum competency* in the areas listed by obtaining and maintaining a valid NERC Reliability Operator certificate.” (emphasis added). It further specifies Areas of Competency, including “Emergency preparedness and operations.” (PER-003-1 R1.1.3).

Under PER-003-1 R1, the sole required task appears to be for System Operators to demonstrate “minimum competency” by obtaining a valid NERC Reliability Operator certificate.

While this requirement overlaps with the “adequate training” requirement set forth in PER-004-2 R1, it does not necessarily cover all training circumstances. By way of example, Texas RE has encountered at least one instance in which an entity’s operators possessed NERC certifications, but had not received adequate training for properly implementing an emergency electric curtailment plan. This lack of training exacerbated an emergency condition, prolonging an event. It is unclear whether the language in PER-003-1 R1, with its focus solely on minimal competency demonstrated through the possession of a NERC certification would be broad enough to address circumstances in which an entity’s training was demonstrably inadequate for a particular circumstance.

In addition to concerns regarding the possible narrowing of the requirement that an entity possess adequately trained operators, Texas RE remains concerned that the elimination of PER-004-2 R1 may introduce unnecessary ambiguity regarding the requirement to staff Reliability Coordinator Control Centers with NERC-certified operators on a continuous basis. In its Consideration of Comments, the SDT constructs such a requirement by combining the requirement in PER-003-1 R1 that Real-time operating positions be staffed by System Operators with various requirements in the IRO Standard family that the SDT argues requires continuous staffing. However, it is not clear that all Real-Time operating tasks must themselves be performed by a System Operator. For instance, the Real-time Assessment (RTA) definition includes a statement that a “Real-time Assessment may be provided through internal systems or through third-party services.” That is, the definition of an RTA appears to permit third-party services to perform the RTA task. As such, it is unclear whether the continuous obligation to perform an RTA correspondingly triggers an obligation to staff a Reliability Coordinator Control Center with NERC-certified System Operators. The SDT should avoid any ambiguity around this requirement by retaining PER-004-2 R1 as currently drafted.

Likes	0
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Dislikes	0
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Response

Robert Kondziolka - Salt River Project - 3

Answer	
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Document Name	
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Comment

I support the comments submitted by Salt River Project.

Likes	0
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Dislikes	0
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Response