



NORTH AMERICAN ELECTRIC  
RELIABILITY CORPORATION

## Comment Form for First Draft of SAR for Certifying System Operators (Project 2007-04)

Please use this form to submit comments on the proposed SAR for Certifying System Operators (Project 2007-04). Comments must be submitted by **August 15, 2007**. Please submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "SO Certification SAR" in the subject line. If you have questions please contact Linda Clarke at [linclrke@msn.com](mailto:linclrke@msn.com) or by telephone at 610-310-7210.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	William J. Smith	
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NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 – Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 – RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 – Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 – Transmission-dependent Utilities
<input checked="" type="checkbox"/> RFC	<input type="checkbox"/>	5 – Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 – Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 – Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 – Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 – Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 – Regional Reliability Organizations and Regional Entities



## Comment Form for First Draft of SAR for Certifying System Operators (Project 2007-04)

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### Background Information

The purpose of this SAR is to modify PER-003 — Operating Personnel Credentials. The proposed modifications should:

1. Provide an adequate level of reliability for the North American bulk power systems — the standards are complete and the requirements are set at an appropriate level to ensure reliability.
2. Ensure the revised standard is enforceable as a mandatory reliability standard with financial penalties — the applicability to bulk power system owners, operators, and users, and as appropriate particular classes of facilities, is clearly defined; the purpose, requirements, and measures are results focused and unambiguous; the consequences of violating the requirements are clear.
3. Incorporate other general improvements described in the standards development work plan.
4. Consider comments received during the initial development of the standards and other comments received from ERO regulatory authorities and stakeholders.
5. Satisfy the standards procedure requirement for five-year review of the standard.

This SAR is intended to address the following:

- FERC Final Rule “Mandatory Reliability Standards for the Bulk-Power System, FERC Order 693” on the NERC standard PER-003
- To incorporate the necessary content, structure, and language to comply with the NERC standards process

Please review the SAR, provide your comments on this form, and then e-mail the form to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) by **August 15, 2007** with the words, “SO Certification SAR” in the subject line.

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**You do not have to answer all questions. Enter All Comments in Simple Text Format.**

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

- 1. Do you agree that there is a reliability-related reason for the proposed SAR? If not, please explain in the comment area.**

Yes

No

Comments:

- 2. Do you agree with the scope of the proposed SAR? If not, please explain in the comment area.**

Yes

No

Comments: Allegheny Power agrees with scope of the proposed SAR. Below are what we feel are the the most important scoping issues: 1) Specify the appropriate levels of certification for all applicable entities; 2) The issue of "Critical Tasks" must be addressed by the Standard Drafting Team. The "Critical Tasks" must be defined as specifically as possible; 3) The phrase "direct, continuous supervision, and obsevation" must be defined in clear language.

- 3. Do you agree with the applicability of the SAR? If not, what functional entities do you think need to be added/deleted?**

Yes

No

Comments: This standard should apply to the Transmission Operator (Local Control Center), Generator Owner (Market Operations Center) the Generator Operator as well as the Transmission Operator, Reliability Coordinator and the Balancing Authority.

- 4. If you are aware of any Regional Variances associated with the proposed standard action, please identify them here**

Comments: The overlapping certification requirements between NERC and ISOs/RTOs should be addressed.

- 5. If you are aware of the need for a business practice to support the proposed standard action, please identify it here.**

Comments: None

- 6. If you have any other comments on this SAR that you haven't already provided in response to the previous questions, please provide them here.**

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Comments: None

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Jeff Hackman	
Organization:	Ameren	
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NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 – Transmission Owners
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Yes

No

Comments:

- 2. Do you agree with the scope of the proposed SAR? If not, please explain in the comment area.**

Yes

No

Comments: New certification credentials should not be established for LCC operators. To the extent they perform BA or TO duties under authority of an ISO/RTO, they should have the same credentials so that they can understand and appreciate their actions in context of the greater system need.

Additionally, to the extent that they have a broader understanding they will be able to offer additional pertinent information to the ISO/RTO operator which may affect his/her decision but was more obvious to the LCC operator. Additionally, the balckout and subsequent events have shaped the new standards and "experience" in the case of "grandfathered" operators is a poor substitute for certification in today's operating climate. Grandfathering should not be part of certificaiton.

- 3. Do you agree with the applicability of the SAR? If not, what functional entities do you think need to be added/deleted?**

Yes

No

Comments:

- 4. If you are aware of any Regional Variances associated with the proposed standard action, please identify them here**

Comments:

- 5. If you are aware of the need for a business practice to support the proposed standard action, please identify it here.**

Comments:

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Michael Scott	
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NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 – Transmission Owners
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Yes

No

Comments:

- 2. Do you agree with the scope of the proposed SAR? If not, please explain in the comment area.**

Yes

No

Comments:

- 3. Do you agree with the applicability of the SAR? If not, what functional entities do you think need to be added/deleted?**

Yes

No

Comments:

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Comments:

- 5. If you are aware of the need for a business practice to support the proposed standard action, please identify it here.**

Comments:

**6. If you have any other comments on this SAR that you haven't already provided in response to the previous questions, please provide them here.**

Comments: On the subject of PER-003-0, B., R1, we agree with the Industry Comment listed that personnel who MEET BOTH requirements R1.1 AND R1.2 shall be NERC certified, not MEET EITHER.

On the subject of PER-003-0, M1, we believe that a qualified individual providing technical direction to a trainee will observe the work in progress to the extent necessary to verify the performance is proper. Providing direction does not imply continuous observation, but does imply control of the performance and observation appropriate to the difficulty and sensitivity of the work. We do not believe that value will be added by creating a requirement to conduct a comprehensive cataloging of task criticality in order to determine the proper amount of work supervision for the trainee. These decisions can be made most effectively by the qualified operator based on the trainee's progress to date, the existing circumstances, and their knowledge of the task at hand.

On the subject of the compliance monitoring process, we agree that the wording "staffing plan" would be more clearly stated as "staffing schedule".



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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Jason Shaver	
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NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 – Transmission Owners
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**1. Do you agree that there is a reliability-related reason for the proposed SAR? If not, please explain in the comment area.**

Yes

No

Comments: ATC agrees that there is a reliability related need for NERC to expand the certification requirements for "operating positions" that have primary responsibility, either directly or through communications with others, for the real-time operation of the interconnected Bulk Electric System. The expansion must include local transmission control center "operating positions" that meet requirement 1.1.

**2. Do you agree with the scope of the proposed SAR? If not, please explain in the comment area.**

Yes

No

Comments: The SAR needs to be expanded to include NERC Standards PER-001 and PER-002. Doing so is the only way to insure the development of a comprehensive set of personnel standards. To limit the effort to only one standard ignores the foreseeable issues.

Will ongoing training be required for the applicable individuals?

Will applicable individuals be required to protect the BES as established in PER-001?

If the answer is no to both of these questions then what will certification achieve?

All control center system operators that are responsible for implementing NERC Requirements either independently or under the directions of the TOP should be certified. In addition those individuals should be required to participate in ongoing training activities.

**3. Do you agree with the applicability of the SAR? If not, what functional entities do you think need to be added/deleted?**

Yes

No

Comments: The addition of other entities to have certified "operating positions" is only one piece of the bigger puzzle. NERC must address the group of personnel standards to insure a set of comprehensive reliability standards. (PER-003, PER-002 and PER-001)

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If other NERC standards are not going to be addressed by this effort then NERC should limit this SAR to only those entities that perform real-time TOP, BA and RC Requirements using non-certified personal.

What is the reason to stop at the certification requirement? (PER-003)

**4. If you are aware of any Regional Variances associated with the proposed standard action, please identify them here**

Comments: No

**5. If you are aware of the need for a business practice to support the proposed standard action, please identify it here.**

Comments: No

**6. If you have any other comments on this SAR that you haven't already provided in response to the previous questions, please provide them here.**

Comments: Item 1:

Using existing NERC rules some Transmission Operators (TOP) have delegated critical real-time operating control to local transmission control centers while at the same time avoiding certification requirements. (PER-003) Because of this situation NERC should review existing rules surrounding the delegation of Requirements and determine if modifications are needed. That effort may result in achieving the same goal as this SAR.

ATC believes that a TOP should not be able to delegate Requirements that address real-time operations to non-certified system operators.

Item 2:

ATC is concerned with the use and weight placed on comments submitted during the Version 0 effort in the developed and justification if this SAR. The standard drafting team should place greater weight and consideration on comments submitted during this effort.



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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Tony Kroskey	
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NERC Region		Registered Ballot Body Segment
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- 1. Do you agree that there is a reliability-related reason for the proposed SAR? If not, please explain in the comment area.**

Yes

No

Comments: Need to clarify some requirements. For example switching operations under the supervision of certified supervisors.

- 2. Do you agree with the scope of the proposed SAR? If not, please explain in the comment area.**

Yes

No

Comments: The Operating Personnel certification is critical for those with the decision making authority over Bulk Power System facilities ie RC, BA, and TOP. The competencies required for the local control center operators is better addressed by training. Extending certification requirements beyond the RC, BA and TOP would go beyond the FERC directive and should not be required.

- 3. Do you agree with the applicability of the SAR? If not, what functional entities do you think need to be added/deleted?**

Yes

No

Comments: Applicability to local control center operators should not required for reasons stated above.

- 4. If you are aware of any Regional Variances associated with the proposed standard action, please identify them here**

Comments:

- 5. If you are aware of the need for a business practice to support the proposed standard action, please identify it here.**

Comments:

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Alan Gale	
Organization:	City of Tallahassee (TAL)	
Telephone:	850-891-3025	
E-mail:	galea@talgov.com	
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Yes

No

Comments: The standard, as it exists today, provides adequate reliability to the Bulk Electric System. The changes are needed from an administrative standpoint to conform to the new format and processes directed by FERC.

Clarity is needed to address the Interpretation Request and the Version 0 comments.

- 2. Do you agree with the scope of the proposed SAR? If not, please explain in the comment area.**

Yes

No

Comments: The term "scope" is not used in the SAR. Is this supposed to be the "Purpose", "Industry Need", Brief Description", "Detailed Description", or "Background Information"? The Detailed Description indicates that this SAR will address which "system operators" needs to be certified. I am okay with that "scope", but am not okay if it delves more deeply into who should be NERC certified.

- 3. Do you agree with the applicability of the SAR? If not, what functional entities do you think need to be added/deleted?**

Yes

No

Comments: Based on the indication that additional system operators may need to be NERC certified as a result of this SAR, applicability should include the Transmission Service Provider, Distribution Provider and the Load-Serving Entity. To not include them from the beginning will "short change" them if the discussions feared in 2 above does take place. These entities do control shedding load, whether as directed by the Reliability Coordinator or by their Transmission Service Provider and should be invited to the party at the beginning.

- 4. If you are aware of any Regional Variances associated with the proposed standard action, please identify them here**

Comments: None

**Comment Form for First Draft of SAR for Certifying System Operators  
(Project 2007-04)**

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- 5. If you are aware of the need for a business practice to support the proposed standard action, please identify it here.**

Comments: None

- 6. If you have any other comments on this SAR that you haven't already provided in response to the previous questions, please provide them here.**

Comments: None

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Wayne Mitchell	
Organization:	Entergy	
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NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 – Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 – RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 – Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 – Transmission-dependent Utilities
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<input type="checkbox"/> SPP	<input type="checkbox"/>	7 – Large Electricity End Users
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	<input type="checkbox"/>	10 – Regional Reliability Organizations and Regional Entities



## Comment Form for First Draft of SAR for Certifying System Operators (Project 2007-04)

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### Background Information

The purpose of this SAR is to modify PER-003 — Operating Personnel Credentials. The proposed modifications should:

1. Provide an adequate level of reliability for the North American bulk power systems — the standards are complete and the requirements are set at an appropriate level to ensure reliability.
2. Ensure the revised standard is enforceable as a mandatory reliability standard with financial penalties — the applicability to bulk power system owners, operators, and users, and as appropriate particular classes of facilities, is clearly defined; the purpose, requirements, and measures are results focused and unambiguous; the consequences of violating the requirements are clear.
3. Incorporate other general improvements described in the standards development work plan.
4. Consider comments received during the initial development of the standards and other comments received from ERO regulatory authorities and stakeholders.
5. Satisfy the standards procedure requirement for five-year review of the standard.

This SAR is intended to address the following:

- FERC Final Rule “Mandatory Reliability Standards for the Bulk-Power System, FERC Order 693” on the NERC standard PER-003
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Please review the SAR, provide your comments on this form, and then e-mail the form to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) by **August 15, 2007** with the words, “SO Certification SAR” in the subject line.



**Comment Form for First Draft of SAR for Certifying System Operators  
(Project 2007-04)**

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**You do not have to answer all questions. Enter All Comments in Simple Text Format.**

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

- 1. Do you agree that there is a reliability-related reason for the proposed SAR? If not, please explain in the comment area.**

Yes

No

Comments: I'm not sure that all TO need to be NERC Certified. In our case we have sub-transmission dispatches that monitor and address switching at the local level and receive operational directions from our Transmission Operators. We recommend that certification requirements for local control centers not be developed.

- 2. Do you agree with the scope of the proposed SAR? If not, please explain in the comment area.**

Yes

No

Comments:

- 3. Do you agree with the applicability of the SAR? If not, what functional entities do you think need to be added/deleted?**

Yes

No

Comments: Not sure that new certification requirements need to be added for all Transmission Dispatchers, I believe NERC has addressed certification and we need to leave it up to the Transmission Owners to establish what level of TO's need to be certified.

- 4. If you are aware of any Regional Variances associated with the proposed standard action, please identify them here**

Comments:

- 5. If you are aware of the need for a business practice to support the proposed standard action, please identify it here.**

Comments:

- 6. If you have any other comments on this SAR that you haven't already provided in response to the previous questions, please provide them here.**

Comments:

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 – Transmission Owners
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- 1. Do you agree that there is a reliability-related reason for the proposed SAR? If not, please explain in the comment area.**

Yes

No

Comments:

- 2. Do you agree with the scope of the proposed SAR? If not, please explain in the comment area.**

Yes

No

Comments:

- 3. Do you agree with the applicability of the SAR? If not, what functional entities do you think need to be added/deleted?**

Yes

No

Comments: Based on the scope of this SAR to determine if entities other than BA, TO and RC should be subject to some type of certification then all functions may be applicable, especially LSE, DP, TSP.

- 4. If you are aware of any Regional Variances associated with the proposed standard action, please identify them here**

Comments:

- 5. If you are aware of the need for a business practice to support the proposed standard action, please identify it here.**

Comments:

- 6. If you have any other comments on this SAR that you haven't already provided in response to the previous questions, please provide them here.**

Comments:

We agree that new certification credentials may need to be developed based on local control center operations, or at least the requirements clarified in the standard with respect to these operators; especially to clarify the RTO/ISO and sub entity responsibilities.

## Comment Form for First Draft of SAR for Certifying System Operators (Project 2007-04)

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The proposal to consider grandfathering certification requirements for transmission operator personnel should be used only as a short transition period to allow proper testing/training/certification of all identified personnel.

Please also consider the following aspects of the standard:

R1 "Each...shall staff all operating positions..." The term "operating positions" needs better definition. For example, does this include technical/engineering personnel on shift that run short term and real time studies?

M1, 1.1, 1.2 are actually "Requirements" and should be moved into that section.

M1.1 "Critical tasks" needs definition, even if only to clarify that they are defined by the entity.

M1.2 is out of place here. Where did the 4 hour limit come from? Should the requirement really be stated in EOP-009 Loss of Control Center Functionality as the time required in which to establish control at a site with NERC certified operators?

D1 "...Staffing schedules and certification numbers will be compared to ensure that positions that require NERC certified operating personnel were covered as required. Certification numbers from the Transmission Operator, Balancing Authority, and Reliability Coordinator will be compared with NERC records..." is actually a Measure and should be moved into that section. The statement regarding exception reporting is no longer needed with the compliance programs that each region has established that require self reporting of violations.

Many organizations have NERC certified personnel who are not necessarily "operators". The requirements to maintain NERC certification are not geared for these support/technical planning personnel. There are benefits to having these individuals knowledgeable of the NERC standards and the operational/reliability concepts behind the NERC certification, but now with the major commitment required for maintaining the 'operator' credential, these individuals will most likely not remain NERC certified. While a training program for non-operators might still encompass these aspects, there should be consideration given as to having a "NERC generic fundamentals" or "technical" certification. This may not be applicable to this standard but more so to the overall certification program.

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	H. Vann Weldon	
Organization:	ERCOT Inc.	
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E-mail:	vweldon@ercot.com	
NERC Region		Registered Ballot Body Segment
<input checked="" type="checkbox"/> <b>ERCOT</b>	<input type="checkbox"/>	1 – Transmission Owners
<input type="checkbox"/> <b>FRCC</b>	<input checked="" type="checkbox"/>	2 – RTOs and ISOs
<input type="checkbox"/> <b>MRO</b>	<input type="checkbox"/>	3 – Load-serving Entities
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*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

- 1. Do you agree that there is a reliability-related reason for the proposed SAR? If not, please explain in the comment area.**

Yes

No

Comments:

- 2. Do you agree with the scope of the proposed SAR? If not, please explain in the comment area.**

Yes

No

Comments:

The purpose statement of PER-003 is ambiguous.

Recommendation:

This SAR on PER-003 should review the purpose statement and consider whether or not the body of the Standard achieves the purpose as worded. If read one way, the purpose of PER-003 may be considered to imply that NERC Certification ensures all "...minimum competencies for operating a reliable Bulk Electric System." , instead of some minimum competencies applicable to all regions.

- 3. Do you agree with the applicability of the SAR? If not, what functional entities do you think need to be added/deleted?**

Yes

No

Comments: Should not apply to operators of power plants; e.g., Generator Owners and/or Generator Operators. Should not apply to those who own, but do not operate bulk electric transmission systems; e.g., Transmission Owners.

- 4. If you are aware of any Regional Variances associated with the proposed standard action, please identify them here**

Comments:

- 5. If you are aware of the need for a business practice to support the proposed standard action, please identify it here.**

Comments:

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Comments: Continuing training of Certified System Operators should remain as a requirement to maintain certification.

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Dave Folk	
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Telephone:	330-384-4668	
E-mail:	folkd@firstenergycorp.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 – Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 – RTOs and ISOs
<input type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 – Load-serving Entities
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*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

- 1. Do you agree that there is a reliability-related reason for the proposed SAR? If not, please explain in the comment area.**

Yes

No

Comments:

- 2. Do you agree with the scope of the proposed SAR? If not, please explain in the comment area.**

Yes

No

Comments: However, the scope should be expanded to include a review of any existing and pending Regional Reliability Organization/Regional Entity standards, policies, requirements, etc. that contain Operator Certification requirements that can and should be elevated to the NERC Operator Certification standard to eliminate duplication wherever possible. This SAR should also include direction on ensuring that this standard development recognizes and is consistent with the Markets that exist and are pending including the methods and concepts used by those markets to ensure reliability related to operator certification. Version 0 comments should be considered in the standard development process with action required only when they are relevant to, applicable to, and will improve the quality and measureability of the standard as it exists today.

The scope should include instruction that the standards drafting team determine the functional entities that require certified operators and the tasks performed by those entities that require operator certification. This determination should include the consideration of the impacts on the reliability of the BES of switching operations under the control of operations personnel including the Local Control Centers via electronic methods (supervisory control) or communication with others. In addition, this determination should consider the amount of load under the control of operations personnel via electronic methods (supervisory control) available for load shedding. Load shedding in significant amounts can have a profound impact on the reliability of the interconnection and must be considered in determining operator certification requirements. Any operator that regularly performs one of those reliability-related tasks on behalf of the functional entity should be required to be certified. Thus, some operators at local control centers may require certification if they are performing some of these functions regularly.

- 3. Do you agree with the applicability of the SAR? If not, what functional entities do you think need to be added/deleted?**

**Comment Form for First Draft of SAR for Certifying System Operators  
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---

Yes

No

Comments: This standard should not be applicable to Generator owners and Generator operators. The function of Generator Operator and Generator owner is very broad. Generator owners own and maintain generation facilities. They do not operate generation facilities. Centrally located Generation Operator (Dispatchers) should be included under this standard due to the impact they can have on the reliability of the BES. Genertor Operators (control room personnel in direct control of the unit at the plant) that operate two units or less simultaneously should not be included in the applicability of this standard due to the minimal impact they can have on the reliability of the BES.

**4. If you are aware of any Regional Variances associated with the proposed standard action, please identify them here**

Comments: Not aware of any.

**5. If you are aware of the need for a business practice to support the proposed standard action, please identify it here.**

Comments: Not aware of any.

**6. If you have any other comments on this SAR that you haven't already provided in response to the previous questions, please provide them here.**

Comments: No other comments



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**1. Do you agree that there is a reliability-related reason for the proposed SAR? If not, please explain in the comment area.**

Yes

No

Comments: There is a need to clearly define who needs to be certified. At the moment within the industry there is a difference in understanding and credentials across the board and there is no consistency. Some TOs' staff are certified while others are not, same for TOPs. At some locations they certify the Senior operator only. A unified approach is necessary for certification.

There is an opportunity for the drafting team to clarify issues related to any type and level of certification that may be required for TOP's staff performing (a) supporting functions (e.g. outage planning), (b) reliability impactful real-time independent actions, (c) switching operations under the supervision of certified supervisors, or (d) responding to changes in equipment status and system conditions in real time (i.e. alarms, trips, etc.).

We believe TOP staff who are at the board and able to control devices that affect reliability, should be certified. This should be the case regardless of whether they answer to a RC or a senior position. They should understand how their operations affect reliability. For example, there may be emergencies that require independent action, loss of communication, etc.

Certification of Local Control Center Operators should not be required only if they have no decision making authority over Bulk Power System facilities. Directives from the FERC Order are centered around concerns regarding what are core competencies. These are strictly training issues and what requirements constitute proper and sufficient training. If this SAR was developed to address the FERC directive then it should be focusing only on what the core competencies should be. There is another Drafting Team working on Transmission Operator Training standard(s) and clarification could also be provided regarding core competencies and coordinated with that team to ensure the FERC directives are met.

**2. Do you agree with the scope of the proposed SAR? If not, please explain in the comment area.**

Yes

No

Comments: See our answer to question 1. The scope should be limited to competencies required for operators whose decisions affect the reliability of the BES. The scope should not be extended to requirements for certification of local control center operators and these should not be addressed in this standard. Extending certification requirements beyond the RC, BA and TOP has gone beyond the FERC directive and should not be required.

**3. Do you agree with the applicability of the SAR? If not, what functional entities do you think need to be added/deleted?**

Yes

**Comment Form for First Draft of SAR for Certifying System Operators  
(Project 2007-04)**

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No

Comments: It is difficult to be exact in determining what entities require certification because some do not affect reliability of the. For example, a small generator or local control area may not be significant to impact the reliability in their area. Perhaps, entities should be identified as impactful based on load/generation capability and voltage levels. From the reliability viewpoint, it is better to over certify than under certify.

The Interchange Authority has not yet been registered for compliance. Equipment owners who do not have any operational impact should not be included. Generator Operators will be trained to operate their specific technology/equipment and, should follow directions of their operational authority (RC, TOP, etc.).

**4. If you are aware of any Regional Variances associated with the proposed standard action, please identify them here**

Comments: No

**5. If you are aware of the need for a business practice to support the proposed standard action, please identify it here.**

Comments: No

**6. If you have any other comments on this SAR that you haven't already provided in response to the previous questions, please provide them here.**

Comments: NERC should encourage certification of operating trainees within their first 6 months of employment. If unable to become certified after a number of attempts (e.g. 3), they are to be seen as not having the minimum competencies needed to operate, and should be removed from the operator training program.

NERC certification represents a minimum requirement of needed knowledge. If trainees are training for a position that requires certification, they should all have to be NERC certified before they are allowed to operate, supervised or not. We need to have rigour, professionalism, and minimum standards for our industry.

We support NERC's move toward CEH requirements as the way to maintain certification. It ensures minimum training is delivered which is inconsistent across the industry..

**Comment Form for First Draft of SAR for Certifying System Operators  
 (Project 2007-04)**

Please use this form to submit comments on the proposed SAR for Certifying System Operators (Project 2007-04). Comments must be submitted by **August 15, 2007**. Please submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "SO Certification SAR" in the subject line. If you have questions please contact Linda Clarke at [linclrke@msn.com](mailto:linclrke@msn.com) or by telephone at 610-310-7210.

<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Ron Falsetti	
Organization:	IESO	
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E-mail:	ron.falsetti@ieso.ca	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 – Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 – RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 – Load-serving Entities
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/>	4 – Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 – Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 – Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 – Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 – Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 – Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 – Regional Reliability Organizations and Regional Entities



## Comment Form for First Draft of SAR for Certifying System Operators (Project 2007-04)

---

### Background Information

The purpose of this SAR is to modify PER-003 — Operating Personnel Credentials. The proposed modifications should:

1. Provide an adequate level of reliability for the North American bulk power systems — the standards are complete and the requirements are set at an appropriate level to ensure reliability.
2. Ensure the revised standard is enforceable as a mandatory reliability standard with financial penalties — the applicability to bulk power system owners, operators, and users, and as appropriate particular classes of facilities, is clearly defined; the purpose, requirements, and measures are results focused and unambiguous; the consequences of violating the requirements are clear.
3. Incorporate other general improvements described in the standards development work plan.
4. Consider comments received during the initial development of the standards and other comments received from ERO regulatory authorities and stakeholders.
5. Satisfy the standards procedure requirement for five-year review of the standard.

This SAR is intended to address the following:

- FERC Final Rule “Mandatory Reliability Standards for the Bulk-Power System, FERC Order 693” on the NERC standard PER-003
- To incorporate the necessary content, structure, and language to comply with the NERC standards process

Please review the SAR, provide your comments on this form, and then e-mail the form to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) by **August 15, 2007** with the words, “SO Certification SAR” in the subject line.



**Comment Form for First Draft of SAR for Certifying System Operators  
(Project 2007-04)**

---

**You do not have to answer all questions. Enter All Comments in Simple Text Format.**

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

- 1. Do you agree that there is a reliability-related reason for the proposed SAR? If not, please explain in the comment area.**

Yes

No

Comments: Operating Personnel certification is critical to maintaining the reliability of the system but at the same time certification of Local Control Center Operators should not be required if they have no decision making authority over Bulk Power System facilities.

- 2. Do you agree with the scope of the proposed SAR? If not, please explain in the comment area.**

Yes

No

Comments: The scope should not be extended to requirements for certification of local control center operators.

FERC's directives in Order 693 deal with competencies of operating personnel - these are training issues and should not be mixed up with operating personnel certification. The directives can be better addressed in coordination with another SDT - Transmission Operator Training Standards.

- 3. Do you agree with the applicability of the SAR? If not, what functional entities do you think need to be added/deleted?**

Yes

No

Comments: We agree with the inclusion of all operating entities but question the need to include Transmission Owners and Generator Owners. In Functional Model Version 3, there are no real-time responsibilities assigned to these entities. Given the purpose of this standard, i.e., requiring operating personnel to acquire a certain level of credentials, the inclusion of these two entities seems inappropriate.

We also believe that these should not apply to other entities including the IA and the GOP

- 4. If you are aware of any Regional Variances associated with the proposed standard action, please identify them here**

Comments: None

- 5. If you are aware of the need for a business practice to support the proposed standard action, please identify it here.**

**Comment Form for First Draft of SAR for Certifying System Operators  
(Project 2007-04)**

---

Comments: No.

**6. If you have any other comments on this SAR that you haven't already provided in response to the previous questions, please provide them here.**

Comments: The drafting team must clarify issues related to any type of certification that may be required for TOP's staff performing (a) supporting functions (e.g. outage planning), (b) reliability impactful real-time independent actions, or (c) switching operations under the supervision of certified supervisors. These are critical issues and unless clarity is obtained on these issues, it will be difficult to move forward to the next stage.

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(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 – Transmission Owners
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<input type="checkbox"/> SERC	<input type="checkbox"/>	6 – Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 – Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 – Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 – Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 – Regional Reliability Organizations and Regional Entities



## Comment Form for First Draft of SAR for Certifying System Operators (Project 2007-04)

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1. Provide an adequate level of reliability for the North American bulk power systems — the standards are complete and the requirements are set at an appropriate level to ensure reliability.
2. Ensure the revised standard is enforceable as a mandatory reliability standard with financial penalties — the applicability to bulk power system owners, operators, and users, and as appropriate particular classes of facilities, is clearly defined; the purpose, requirements, and measures are results focused and unambiguous; the consequences of violating the requirements are clear.
3. Incorporate other general improvements described in the standards development work plan.
4. Consider comments received during the initial development of the standards and other comments received from ERO regulatory authorities and stakeholders.
5. Satisfy the standards procedure requirement for five-year review of the standard.

This SAR is intended to address the following:

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Please review the SAR, provide your comments on this form, and then e-mail the form to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) by **August 15, 2007** with the words, “SO Certification SAR” in the subject line.

**Comment Form for First Draft of SAR for Certifying System Operators  
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**You do not have to answer all questions. Enter All Comments in Simple Text Format.**

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

- 1. Do you agree that there is a reliability-related reason for the proposed SAR? If not, please explain in the comment area.**

Yes

No

Comments: Certification of Local Control Center Operators is not required if they have no decisional making authority over Bulk Power System facilities and are implementing directives of a certified Operator.

- 2. Do you agree with the scope of the proposed SAR? If not, please explain in the comment area.**

Yes

No

Comments:

- 3. Do you agree with the applicability of the SAR? If not, what functional entities do you think need to be added/deleted?**

Yes

No

Comments: We believe that IA, GO, GOP and TO be removed from applicability. The Interchange Authority has not yet been registered for compliance. Equipment owners do not have any operational impact and, therefore, should not be included. Generator Operators will be trained to operate their specific technology/equipment and, should follow directions of their operational authority (RC, TOP, etc.).

- 4. If you are aware of any Regional Variances associated with the proposed standard action, please identify them here**

Comments:

- 5. If you are aware of the need for a business practice to support the proposed standard action, please identify it here.**

Comments:

- 6. If you have any other comments on this SAR that you haven't already provided in response to the previous questions, please provide them here.**

Comments: As cited in FERC 693 under PER-003, Commission determined that no requirements were to be added for LCC, TO or GO certification:

## Comment Form for First Draft of SAR for Certifying System Operators (Project 2007-04)

---

"1407. Northern Indiana and APPA raise persuasive arguments regarding labor relations and labor retention issues that may arise if generator operators are required to be NERCcertified. The Commission understands these concerns and is persuaded not to require generator operators or transmission operators at local control centers to be NERCcertified at this time. In addition, the Commission understands that there are some long tenured unionized transmission operators who are very capable operators but who are unable to secure certification. This is not a new problem and has been addressed in various collective bargaining negotiations through grandfathering such capable operators who are unable to become certified. However, the Commission directs that if grandfathering is implemented, the entity must attest that the operators are competent. The Commission directs the ERO to consider grandfathering certification requirements for these personnel so that the industry can retain the knowledge and skill of these longtenured operators. Personnel that are subject to such grandfathering still must comply with applicable training requirements pursuant to PER-002-0."

Furthermore, the Commission's determination appearing in PER-002 of FERC Order 693 "1348. Several commenters express concern about requiring local control center operators to become fully trained to the same extent as transmission operators, balancing authorities and reliability coordinators. This is not the Commission's intent. As we stated in the NOPR, the proposed modifications do not imply a "one-size-fits-all" approach but rather ensure the creation of training programs that are structured and tailored to the different functions and needs of the personnel involved. Therefore the Commission agrees with Entergy that the training program should be tailored to the functions local control center operators, generator operators and operations planning staff perform that impact the reliable operation of the Bulk-Power System for both normal and emergency operations."

"1408. No comments were received on the proposed modifications to direct the ERO to modify the Reliability Standard to specify the minimum competencies that must be demonstrated to become and remain a certified operator and to identify the minimum competencies operating personnel must demonstrate to be certified. The Commission finds that these modifications improve the Reliability Standard by focusing on necessary competencies. Accordingly, the Commission directs the ERO to develop these modifications to the Reliability Standard.

1409. We find that the Reliability Standard serves an important reliability goal in requiring applicable entities to staff all operating positions that have a primary responsibility for real-time operations or are directly responsible for complying with the Reliability Standards with NERC-certified staff. Accordingly, the Commission approves Reliability Standard PER-003-0. In addition, pursuant to section 215(d)(5) of the FPA and § 39.5(f) of our regulations, the Commission directs the ERO to develop a modification to PER-003-0 through the Reliability Standards development process that: (1) specifies the minimum competencies that must be demonstrated to become and remain a certified operator and (2) identifies the minimum competencies operating personnel must demonstrate to be certified. The Commission also directs the ERO to consider grandfathering certification requirements for transmission operator personnel in the Reliability Standards development process."



NORTH AMERICAN ELECTRIC  
RELIABILITY CORPORATION

## Comment Form for First Draft of SAR for Certifying System Operators (Project 2007-04)

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Kathleen Goodman	
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NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 – Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 – RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 – Load-serving Entities
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<input type="checkbox"/> SPP	<input type="checkbox"/>	7 – Large Electricity End Users
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## Comment Form for First Draft of SAR for Certifying System Operators (Project 2007-04)

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3. Incorporate other general improvements described in the standards development work plan.
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**Comment Form for First Draft of SAR for Certifying System Operators  
(Project 2007-04)**

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**You do not have to answer all questions. Enter All Comments in Simple Text Format.**

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

- 1. Do you agree that there is a reliability-related reason for the proposed SAR? If not, please explain in the comment area.**

Yes

No

Comments: Certification of Local Control Center Operators should not be required if they have no decisional making authority over Bulk Power System facilities. Directives from the FERC Order are centered around concerns regarding what are core competencies. These are strictly training issues and what requirements constitute proper and sufficient training. If this SAR was developed to address the FERC directive then it should be focusing only on what the core competencies should be. There is another Drafting Team working on Transmission Operator Training standard(s) and clarification could also be provided regarding core competencies and coordinated with that team to ensure the FERC directives are met.

- 2. Do you agree with the scope of the proposed SAR? If not, please explain in the comment area.**

Yes

No

Comments: The scope should be limited to competencies required for operators and should not be extended to requirements for certification of local control center operators; extending certification requirements beyond the RC, BA and TOP goes beyond the FERC directive.

- 3. Do you agree with the applicability of the SAR? If not, what functional entities do you think need to be added/deleted?**

Yes

No

Comments: The IA, GO, GOP and TO should be removed from applicability. The Interchange Authority has not yet been registered for compliance. Equipment owners do not have any operational impact and, therefore, should not be included. Generator Operators will be trained to operate their specific technology/equipment and, should follow directions of their operational authority (RC, TOP, etc.).

- 4. If you are aware of any Regional Variances associated with the proposed standard action, please identify them here**

Comments:

- 5. If you are aware of the need for a business practice to support the proposed standard action, please identify it here.**

Comments:

**Comment Form for First Draft of SAR for Certifying System Operators  
(Project 2007-04)**

---

**6. If you have any other comments on this SAR that you haven't already provided in response to the previous questions, please provide them here.**

Comments: As cited in FERC 693 under PER-003, Commission determination, no requirements were to be added for LCC, TO or GO certification:

"1407. Northern Indiana and APPA raise persuasive arguments regarding labor relations and labor retention issues that may arise if generator operators are required to be NERCcertified. The Commission understands these concerns and is persuaded not to require generator operators or transmission operators at local control centers to be NERCcertified at this time. In addition, the Commission understands that there are some long tenured unionized transmission operators who are very capable operators but who are unable to secure certification. This is not a new problem and has been addressed in various collective bargaining negotiations through grandfathering such capable operators who are unable to become certified. However, the Commission directs that if grandfathering is implemented, the entity must attest that the operators are competent. The Commission directs the ERO to consider grandfathering certification requirements for these personnel so that the industry can retain the knowledge and skill of these longtenured operators. Personnel that are subject to such grandfathering still must comply with applicable training requirements pursuant to PER-002-0."

Furthermore, the Commission's determination appearing in PER-002 of FERC Order 693:

"1348. Several commenters express concern about requiring local control center operators to become fully trained to the same extent as transmission operators, balancing authorities and reliability coordinators. This is not the Commission's intent. As we stated in the NOPR, the proposed modifications do not imply a "one-size-fits-all" approach but rather ensure the creation of training programs that are structured and tailored to the different functions and needs of the personnel involved.<sup>369</sup> Therefore the Commission agrees with Entergy that the training program should be tailored to the functions local control center operators, generator operators and operations planning staff perform that impact the reliable operation of the Bulk-Power System for both normal and emergency operations."

"1408. No comments were received on the proposed modifications to direct the ERO to modify the Reliability Standard to specify the minimum competencies that must be demonstrated to become and remain a certified operator and to identify the minimum competencies operating personnel must demonstrate to be certified. The Commission finds that these modifications improve the Reliability Standard by focusing on necessary competencies. Accordingly, the Commission directs the ERO to develop these modifications to the Reliability Standard.

**Comment Form for First Draft of SAR for Certifying System Operators  
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1409. We find that the Reliability Standard serves an important reliability goal in requiring applicable entities to staff all operating positions that have a primary responsibility for real-time operations or are directly responsible for complying with the Reliability Standards with NERC-certified staff. Accordingly, the Commission approves Reliability Standard PER-003-0. In addition, pursuant to section 215(d)(5) of the FPA and § 39.5(f) of our regulations, the Commission directs the ERO to develop a modification to PER-003-0 through the Reliability Standards development process that: (1) specifies the minimum competencies that must be demonstrated to become and remain a certified operator and (2) identifies the minimum competencies operating personnel must demonstrate to be certified. The Commission also directs the ERO to consider grandfathering certification requirements for transmission operator personnel in the Reliability Standards development process."

Also, if the SAR proceeds, there is an opportunity for the drafting team to clarify issues related to any type of certification that may be required for TOP's staff performing (a) supporting functions (e.g. outage planning), (b) reliability impactful real-time independent actions, or (c) switching operations under the supervision of certified supervisors.

Finally, as to the Exelon Corporation suggestion "that Version 1 of this Standard be initiated to address the requirement to have NERC Certified Operators that perform functions that are formally delegated similar to the requirement of Policy 9B Req. 3." It is our understanding that only tasks may be delegated, not functions.

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Brian Thumm	
Organization:	ITC	
Telephone:	248-374-7846	
E-mail:	bthumm@itctransco.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 – Transmission Owners
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*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

- 1. Do you agree that there is a reliability-related reason for the proposed SAR? If not, please explain in the comment area.**

Yes

No

Comments:

- 2. Do you agree with the scope of the proposed SAR? If not, please explain in the comment area.**

Yes

No

Comments:

- 3. Do you agree with the applicability of the SAR? If not, what functional entities do you think need to be added/deleted?**

Yes

No

Comments:

- 4. If you are aware of any Regional Variances associated with the proposed standard action, please identify them here**

Comments:

- 5. If you are aware of the need for a business practice to support the proposed standard action, please identify it here.**

Comments:

- 6. If you have any other comments on this SAR that you haven't already provided in response to the previous questions, please provide them here.**

Comments: The SAR proposes " grandfathering certification requirements for transmission operator personnel as part of the standards development process." We would like clarification on what, specifically, the grandfathering will cover, and for how long. Depending on the answer, grandfathering may or not be appropriate for inclusion in the SAR/Standard.

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Jay Chase	
Organization:	KAMO Power	
Telephone:	918-276-0181	
E-mail:	jchase@kamopower.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 – Transmission Owners
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- 1. Do you agree that there is a reliability-related reason for the proposed SAR? If not, please explain in the comment area.**

Yes

No

Comments:

- 2. Do you agree with the scope of the proposed SAR? If not, please explain in the comment area.**

Yes

No

Comments:

- 3. Do you agree with the applicability of the SAR? If not, what functional entities do you think need to be added/deleted?**

Yes

No

Comments:

- 4. If you are aware of any Regional Variances associated with the proposed standard action, please identify them here**

Comments:

- 5. If you are aware of the need for a business practice to support the proposed standard action, please identify it here.**

Comments: There should be a ban on the practice of entities having formal or informal agreements that limit a certified operator's employment options without the prior knowledge and written consent of the operator.

- 6. If you have any other comments on this SAR that you haven't already provided in response to the previous questions, please provide them here.**

Comments: This will not only improve the reliability of the bulk electric system, it will also save money by assuring that operators are knowledgeable of their system and are operating lines and equipment in a safe and efficient manner. Maintaining certification will assure that every operator is constantly gaining the expertise required to operate in normal and emergency conditions.



NORTH AMERICAN ELECTRIC  
RELIABILITY CORPORATION

## Comment Form for First Draft of SAR for Certifying System Operators (Project 2007-04)

Please use this form to submit comments on the proposed SAR for Certifying System Operators (Project 2007-04). Comments must be submitted by **August 15, 2007**. Please submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "SO Certification SAR" in the subject line. If you have questions please contact Linda Clarke at [linclrke@msn.com](mailto:linclrke@msn.com) or by telephone at 610-310-7210.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Michael Gammon	
Organization:	Kansas City Power & Light	
Telephone:	816-654-1242	
E-mail:	mike.gammon@kcpl.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 – Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 – RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 – Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 – Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 – Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 – Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 – Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 – Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 – Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 – Regional Reliability Organizations and Regional Entities



## Comment Form for First Draft of SAR for Certifying System Operators (Project 2007-04)

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### Background Information

The purpose of this SAR is to modify PER-003 — Operating Personnel Credentials. The proposed modifications should:

1. Provide an adequate level of reliability for the North American bulk power systems — the standards are complete and the requirements are set at an appropriate level to ensure reliability.
2. Ensure the revised standard is enforceable as a mandatory reliability standard with financial penalties — the applicability to bulk power system owners, operators, and users, and as appropriate particular classes of facilities, is clearly defined; the purpose, requirements, and measures are results focused and unambiguous; the consequences of violating the requirements are clear.
3. Incorporate other general improvements described in the standards development work plan.
4. Consider comments received during the initial development of the standards and other comments received from ERO regulatory authorities and stakeholders.
5. Satisfy the standards procedure requirement for five-year review of the standard.

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Please review the SAR, provide your comments on this form, and then e-mail the form to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) by **August 15, 2007** with the words, “SO Certification SAR” in the subject line.



**Comment Form for First Draft of SAR for Certifying System Operators  
(Project 2007-04)**

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**You do not have to answer all questions. Enter All Comments in Simple Text Format.**

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

- 1. Do you agree that there is a reliability-related reason for the proposed SAR? If not, please explain in the comment area.**

Yes

No

Comments:

- 2. Do you agree with the scope of the proposed SAR? If not, please explain in the comment area.**

Yes

No

Comments: Item 3 in the scope refers to incorporation of improvements from the standards development work plan, but I did not find that in the materials. I have indicated "Yes" to this question, with some concern as to what is contained in the standards development work plan that I am not aware of.

- 3. Do you agree with the applicability of the SAR? If not, what functional entities do you think need to be added/deleted?**

Yes

No

Comments:

- 4. If you are aware of any Regional Variances associated with the proposed standard action, please identify them here**

Comments: No.

- 5. If you are aware of the need for a business practice to support the proposed standard action, please identify it here.**

Comments: None.

- 6. If you have any other comments on this SAR that you haven't already provided in response to the previous questions, please provide them here.**

Comments: This standard should be careful to not include a certification requirement for any personnel who take direct orders from others to operate equipment on the BES and who cannot deviate from that direction and take independent actions that could affect the BES. This standard

**Comment Form for First Draft of SAR for Certifying System Operators  
(Project 2007-04)**

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should also be careful not to include personnel who support the systems and tools for system operators.

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<b>Individual Commenter Information</b>		
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Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region		Registered Ballot Body Segment
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**Comment Form for First Draft of SAR for Certifying System Operators  
(Project 2007-04)**

Group Comments (Complete this page if comments are from a group.)

**Group Name:** Midwest ISO Stakeholders

**Lead Contact:** Jason Marshall

**Contact Organization:** Midwest ISO

**Contact Segment:** 2

**Contact Telephone:** 317-249-5494

**Contact E-mail:** jmarshall@midwestiso.org

Additional Member Name	Additional Member Organization	Region *	Segment *
Jim Cyrulewski	JDRJC Associates	RFC	8
Joseph DePoorter	Madison Gas and Electric	MRO	4
Jim Eckels	First Energy	RFC	1
Joe Knight	Great River Energy	MRO	1
Dick Pursley	Great River Energy	MRO	1
Larry Larson	Otter Tail Power Company	MRO	1
Greg Mason	Dynergy	RFC+	5
		SERC+	5
		NPCC+	5
		WECC	5
Jeanne Kurzynowski	Consumers Energy	RFC	3,4

\*If more than one Region or Segment applies, please list all. Regional acronyms and segment numbers are shown on prior page.

## Comment Form for First Draft of SAR for Certifying System Operators (Project 2007-04)

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The purpose of this SAR is to modify PER-003 — Operating Personnel Credentials. The proposed modifications should:

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**Comment Form for First Draft of SAR for Certifying System Operators  
(Project 2007-04)**

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**You do not have to answer all questions. Enter All Comments in Simple Text Format.**

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

- 1. Do you agree that there is a reliability-related reason for the proposed SAR? If not, please explain in the comment area.**

Yes

No

Comments:

- 2. Do you agree with the scope of the proposed SAR? If not, please explain in the comment area.**

Yes

No

Comments: The applicability of this Standard should not be extended to include Generator Owners or Generator Operators. Generator Owners own and maintain generation facilities. They do not operate generation facilities. Generation Operators operate generation facilities.

This Standard should not be extended to include Generator Operators in total. Many positions that routinely operate generating units are staffed by long-tenured union Control Room Operators in Plants who take directions from a centralized Generation Control Center and/or the local RTO/ISO. To require certification of these personnel would be analogous to requiring the certification of the outside field force of a Transmission Operator, including positions that operate and switch electric transmission lines.

Many of the V0 industry comments are no longer relevant and confusing. For instance many refer to the former operating policies. These policies are retired and thus those comments should be ignored.

- 3. Do you agree with the applicability of the SAR? If not, what functional entities do you think need to be added/deleted?**

Yes

No

Comments: The applicability of this Standard should not be extended to include Generator Owners or Generator Operators. Generator Owners own and maintain generation facilities. They do not operate generation facilities. Generation Operators operate generation facilities.

This Standard should not be extended to include Generator Operators in total. Many positions that routinely operate generating units are staffed by long-tenured union Control Room Operators in Plants who take directions from a centralized Generation Control Center and/or the local RTO/ISO. To require certification of these personnel would be analogous to requiring the certification of the

## **Comment Form for First Draft of SAR for Certifying System Operators (Project 2007-04)**

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outside field force of a Transmission Operator, including positions that operate and switch electric transmission lines.

A limited extension of this Standard to only include the real time operation personnel in a centralized Generation Control Center that interfaces with the Plants and the local RTO/ISO may be appropriate. However, it would not be appropriate in all situations. For example, PJM requires local control center operators to be PJM certified. In this case, there is no need for additional certification of these local control center operators.

Additionally, the scope indicates that "grandfathering certification requirements for transmission operator personnel" will be considered. FERC did not give a choice. They ordered that certain operators will not have to be certified due to grandfathering provisions. Thus, the only consideration is how to word this correctly in the standard. This exception should not apply only to transmission operator personnel as well. Any company with unionized operation personnel could have this problem. Modification of job requirements such as requiring certification is a trigger for contract re-negotiations with many collective bargaining agreements. FERC was very clear they did not intend to cause this to occur.

FERC did indicate that management personnel at these companies with grandfathered operators must ensure they are qualified to operate the system. The standards drafting team may want to consider including a requirement for these companies to formally do this in the standard through a letter to NERC Operator Certification Personnel or some similar means.

### **4. If you are aware of any Regional Variances associated with the proposed standard action, please identify them here**

Comments:

### **5. If you are aware of the need for a business practice to support the proposed standard action, please identify it here.**

Comments:

### **6. If you have any other comments on this SAR that you haven't already provided in response to the previous questions, please provide them here.**

Comments: The scope should reflect that the standards drafting team should determine which functional entities require certified operators and which specific requirements in the standards should require operator certification. Then, any operator that regularly performs a task to meet compliance with one of these specific requirements should be required to be certified. Thus, some operators at local control centers may require certification if they are performing tasks to meet compliance on behalf of a registered entity. FERC clearly supports this position in Order 693. They specified that operators at local

**Comment Form for First Draft of SAR for Certifying System Operators  
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control centers should not be required to be certified unless they are performing functions that impact the BES. If the specific requirements is limited to those affecting the BES, any local control center operator regularly performing one of those functions would meet this exception.



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(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 – Transmission Owners
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<input type="checkbox"/> MRO	<input type="checkbox"/>	3 – Load-serving Entities
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<input type="checkbox"/> WECC	<input type="checkbox"/>	8 – Small Electricity End Users
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**Comment Form for First Draft of SAR for Certifying System Operators  
(Project 2007-04)**

---

Group Comments (Complete this page if comments are from a group.)

**Group Name:** Midwest Reliability Organization (MRO)  
**Lead Contact:** Michael Brytowski  
**Contact Organization:** Midwest Reliability Organization (MRO)  
**Contact Segment:** 10  
**Contact Telephone:** 651-855-1728  
**Contact E-mail:** mj.brytowski@midwestreliability.org

Additional Member Name	Additional Member Organization	Region*	Segment*
Eric Ruskamp	LES	MRO	10
Michael Brytowski (secretary)	MRO	MRO	10
Laura Elsenpeter	MRO	MRO	10
Mark Pinney	MP	MRO	10
Mac Bohman	MP	MRO	10
Dave Rudolph	BEPC	MRO	10
Jason Marshall	MISO	MRO	10
Jim Haigh	WAPA	MRO	10
Pam Oreschick	XCEL	MRO	10
Carol Gerou	MP	MRO	10
Terry Bilke	MISO	MRO	10
Joe Knight	GRE	MRO	10

\*If more than one Region or Segment applies, please list all. Regional acronyms and segment numbers are shown on prior page.

## Comment Form for First Draft of SAR for Certifying System Operators (Project 2007-04)

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**Comment Form for First Draft of SAR for Certifying System Operators  
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*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

**1. Do you agree that there is a reliability-related reason for the proposed SAR? If not, please explain in the comment area.**

Yes

No

Comments:

**2. Do you agree with the scope of the proposed SAR? If not, please explain in the comment area.**

Yes

No

Comments:

1. In the SAR detailed description (second paragraph which starts with the text "During 2006, the standards staff received a request ..."), there is a sentence which states "the certification requirements for local transmission control center operators and local generation control center operators need to be identified and then the standard needs to be modified to address their certification." In the FERC Final Order 693 dated 03/16/07, paragraph 1407 (on page 372) disagrees with this purposed methodology since the commission was persuaded that a requirement of this nature would be too burdensome on labor relations and labor retention issues.

2. The MRO strongly recommends that the SDT take a hard look at which type of personnel will require certification and to what level. The MRO further recommends that certification is established by functions that are performed by personnel. For example, an engineer performing a next day transmission security study to meet NERC IRO-004 standard should be required to be certified as an Reliability Coordinator operator.

3. In this standard (NERC PER-003), measure 1.2 should be included in the requirement so that it is not an exception for the requirement.

4. The MRO requests clarification on how competences for each different operating classification will be identified?

**3. Do you agree with the applicability of the SAR? If not, what functional entities do you think need to be added/deleted?**

Yes

No

Comments: The transmission owner (TO) and generator owner (GO) should be removed from the scope. These entities don't have a primary responsibility for real-time operations.

**Comment Form for First Draft of SAR for Certifying System Operators  
(Project 2007-04)**

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- 4. If you are aware of any Regional Variances associated with the proposed standard action, please identify them here**

Comments: N/A

- 5. If you are aware of the need for a business practice to support the proposed standard action, please identify it here.**

Comments: N/A

- 6. If you have any other comments on this SAR that you haven't already provided in response to the previous questions, please provide them here.**

Comments: N/A



NORTH AMERICAN ELECTRIC  
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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Rick White	
Organization:	Northeast Utilites	
Telephone:	860-665-2572	
E-mail:	whitefb@nu.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 – Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 – RTOs and ISOs
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**Comment Form for First Draft of SAR for Certifying System Operators  
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*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

- 1. Do you agree that there is a reliability-related reason for the proposed SAR? If not, please explain in the comment area.**

Yes

No

Comments:

- 2. Do you agree with the scope of the proposed SAR? If not, please explain in the comment area.**

Yes

No

Comments:

- 3. Do you agree with the applicability of the SAR? If not, what functional entities do you think need to be added/deleted?**

Yes

No

Comments:

- 4. If you are aware of any Regional Variances associated with the proposed standard action, please identify them here**

Comments:

- 5. If you are aware of the need for a business practice to support the proposed standard action, please identify it here.**

Comments:

- 6. If you have any other comments on this SAR that you haven't already provided in response to the previous questions, please provide them here.**

Comments: We agree that the standard needs to be modified to clarify which operating personnel need to be NERC certified.

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**Comment Form for First Draft of SAR for Certifying System Operators  
(Project 2007-04)**

Group Comments (Complete this page if comments are from a group.)

**Group Name:** NPCC Reliability Standards Committee

**Lead Contact:** Guy V. Zito

**Contact Organization:** NPCC

**Contact Segment:** 10

**Contact Telephone:** 212.840.1070

**Contact E-mail:** gzito@npcc.org

<b>Additional Member Name</b>	<b>Additional Member Organization</b>	<b>Region*</b>	<b>Segment*</b>
Ralph Rufrano	New York Power Authority	NPCC	1
Donald Nelson	MA-DPU/EPD	NPCC	9
Michael Schiavne	NGrid	NPCC	1
Bill DeVries	New York ISO	NPCC	2
David Kiguel	Hydro One Networks	NPCC	2
Roger Champagne	Hydro Quebec TransEnergie	NPCC	1
Mike Ranalli	NGrid	NPCC	1
Michael Gildea	Constellation Energy	NPCC	5
Bob Pelligrini	United Illuminating	NPCC	1
Diane Barney	New York PSC	NPCC	9
Kathleen Goodman	ISO-New England	NPCC	2
Edwin Thompson	ConEdison	NPCC	1
Ron Falsetti	IESO, Ontario	NPCC	2
Al Adamson	New York State Reliability Council	NPCC	10
Brian Hogue	NPCC	NPCC	10
Guy V. Zito	NPCC	NPCC	10

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**Comment Form for First Draft of SAR for Certifying System Operators  
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**You do not have to answer all questions. Enter All Comments in Simple Text Format.**

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

- 1. Do you agree that there is a reliability-related reason for the proposed SAR? If not, please explain in the comment area.**

Yes

No

Comments: Certification of Local Control Center Operators should not be required if they have no decisional making authority over Bulk Power System facilities. Directives from the FERC Order are centered around concerns regarding what are core competencies. These are strictly training issues and what requirements constitute proper and sufficient training. If this SAR was developed to address the FERC directive then it should be focusing only on what the core competencies should be. There is another Drafting Team working on Transmission Operator Training standard(s) and clarification could also be provided regarding core competencies and coordinated with that team to ensure the FERC directives are met.

- 2. Do you agree with the scope of the proposed SAR? If not, please explain in the comment area.**

Yes

No

Comments: The scope should be limited to competencies required for operators and should not be extended to requirements for certification of local control center operators and this "THOSE" should not be addressed in this standard. Extending certification requirements beyond the RC, BA and TOP has gone beyond the FERC directive and should not be required.

- 3. Do you agree with the applicability of the SAR? If not, what functional entities do you think need to be added/deleted?**

Yes

No

Comments: NPCC participating members believe that IA, GO, GOP and TO should be removed from applicability. The Interchange Authority has not yet been registered for compliance. Equipment owners do not have any operational impact and, therefore, should not be included. Generator Operators will be trained to operate their specific technology/equipment and, should follow directions of their operational authority (RC, TOP, etc.)."

- 4. If you are aware of any Regional Variances associated with the proposed standard action, please identify them here**

Comments:

**Comment Form for First Draft of SAR for Certifying System Operators  
(Project 2007-04)**

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**5. If you are aware of the need for a business practice to support the proposed standard action, please identify it here.**

Comments:

**6. If you have any other comments on this SAR that you haven't already provided in response to the previous questions, please provide them here.**

Comments: As cited in FERC 693 under PER-003, Commission determination, no requirements were to be added for LCC, TO or GO certification

"1407. Northern Indiana and APPA raise persuasive arguments regarding labor relations and labor retention issues that may arise if generator operators are required to be NERCcertified. The Commission understands these concerns and is persuaded not to require generator operators or transmission operators at local control centers to be NERCcertified at this time. In addition, the Commission understands that there are some long tenured unionized transmission operators who are very capable operators but who are unable to secure certification. This is not a new problem and has been addressed in various collective bargaining negotiations through grandfathering such capable operators who are unable to become certified. However, the Commission directs that if grandfathering is implemented, the entity must attest that the operators are competent. The Commission directs the ERO to consider grandfathering certification requirements for these personnel so that the industry can retain the knowledge and skill of these longtenured operators. Personnel that are subject to such grandfathering still must comply with applicable training requirements pursuant to PER-002-0."

Furthermore, the Commission's determination appearing in PER-002 of FERC Order 693 "1348. Several commenters express concern about requiring local control center operators to become fully trained to the same extent as transmission operators, balancing authorities and reliability coordinators. This is not the Commission' s intent. As we stated in the NOPR, the proposed modifications do not imply a " one-size-fits-all" approach but rather ensure the creation of training programs that are structured and tailored to the different functions and needs of the personnel involved.<sup>369</sup> Therefore the Commission agrees with Entergy that the training program should be tailored to the functions local control center operators, generator operators and operations planning staff perform that impact the reliable operation of the Bulk-Power System for both normal and emergency operations."

"1408. No comments were received on the proposed modifications to direct the ERO to modify the Reliability Standard to specify the minimum competencies that must be demonstrated to become and remain a certified operator and to identify the minimum competencies operating personnel must demonstrate to be certified. The Commission finds that these modifications improve the Reliability Standard by focusing on necessary

**Comment Form for First Draft of SAR for Certifying System Operators  
(Project 2007-04)**

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competencies. Accordingly, the Commission directs the ERO to develop these modifications to the Reliability Standard.

1409. We find that the Reliability Standard serves an important reliability goal in requiring applicable entities to staff all operating positions that have a primary responsibility for real-time operations or are directly responsible for complying with the Reliability Standards with NERC-certified staff. Accordingly, the Commission approves Reliability Standard PER-003-0. In addition, pursuant to section 215(d)(5) of the FPA and § 39.5(f) of our regulations, the Commission directs the ERO to develop a modification to PER-003-0 through the Reliability Standards development process that: (1) specifies the minimum competencies that must be demonstrated to become and remain a certified operator and (2) identifies the minimum competencies operating personnel must demonstrate to be certified. The Commission also directs the ERO to consider grandfathering certification requirements for transmission operator personnel in the Reliability Standards development process."

Also, if the SAR proceeds, there is an opportunity for the drafting team to clarify issues related to any type of certification that may be required for TOP's staff performing (a) supporting functions (e.g. outage planning), (b) reliability impactful real-time independent actions, or (c) switching operations under the supervision of certified supervisors.

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Stan Southers / Ellis Rankin	
Organization:	Oncor Electric Delivery	
Telephone:	214-486-2084 / 214-743-6825	
E-mail:	stan.southers@oncor.com / erankin@oncor.com	
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input checked="" type="checkbox"/> <b>ERCOT</b>	<input checked="" type="checkbox"/>	1 – Transmission Owners
<input type="checkbox"/> <b>FRCC</b>	<input type="checkbox"/>	2 – RTOs and ISOs
<input type="checkbox"/> <b>MRO</b>	<input type="checkbox"/>	3 – Load-serving Entities
<input type="checkbox"/> <b>NPCC</b>	<input type="checkbox"/>	4 – Transmission-dependent Utilities
<input type="checkbox"/> <b>RFC</b>	<input type="checkbox"/>	5 – Electric Generators
<input type="checkbox"/> <b>SERC</b>	<input type="checkbox"/>	6 – Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> <b>SPP</b>	<input type="checkbox"/>	7 – Large Electricity End Users
<input type="checkbox"/> <b>WECC</b>	<input type="checkbox"/>	8 – Small Electricity End Users
<input type="checkbox"/> <b>NA – Not Applicable</b>	<input type="checkbox"/>	9 – Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 – Regional Reliability Organizations and Regional Entities





## Comment Form for First Draft of SAR for Certifying System Operators (Project 2007-04)

---

### Background Information

The purpose of this SAR is to modify PER-003 — Operating Personnel Credentials. The proposed modifications should:

1. Provide an adequate level of reliability for the North American bulk power systems — the standards are complete and the requirements are set at an appropriate level to ensure reliability.
2. Ensure the revised standard is enforceable as a mandatory reliability standard with financial penalties — the applicability to bulk power system owners, operators, and users, and as appropriate particular classes of facilities, is clearly defined; the purpose, requirements, and measures are results focused and unambiguous; the consequences of violating the requirements are clear.
3. Incorporate other general improvements described in the standards development work plan.
4. Consider comments received during the initial development of the standards and other comments received from ERO regulatory authorities and stakeholders.
5. Satisfy the standards procedure requirement for five-year review of the standard.

This SAR is intended to address the following:

- FERC Final Rule “Mandatory Reliability Standards for the Bulk-Power System, FERC Order 693” on the NERC standard PER-003
- To incorporate the necessary content, structure, and language to comply with the NERC standards process

Please review the SAR, provide your comments on this form, and then e-mail the form to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) by **August 15, 2007** with the words, “SO Certification SAR” in the subject line.

**Comment Form for First Draft of SAR for Certifying System Operators  
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**You do not have to answer all questions. Enter All Comments in Simple Text Format.**

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

**1. Do you agree that there is a reliability-related reason for the proposed SAR? If not, please explain in the comment area.**

Yes

No

Comments:

**2. Do you agree with the scope of the proposed SAR? If not, please explain in the comment area.**

Yes

No

Comments:

**3. Do you agree with the applicability of the SAR? If not, what functional entities do you think need to be added/deleted?**

Yes

No

Comments:

**4. If you are aware of any Regional Variances associated with the proposed standard action, please identify them here**

Comments:

**5. If you are aware of the need for a business practice to support the proposed standard action, please identify it here.**

Comments:

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 – Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 – RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 – Load-serving Entities
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Yes

No

Comments:

**2. Do you agree with the scope of the proposed SAR? If not, please explain in the comment area.**

Yes

No

Comments:

**3. Do you agree with the applicability of the SAR? If not, what functional entities do you think need to be added/deleted?**

Yes

No

Comments:

**4. If you are aware of any Regional Variances associated with the proposed standard action, please identify them here**

Comments:

**5. If you are aware of the need for a business practice to support the proposed standard action, please identify it here.**

Comments:

**6. If you have any other comments on this SAR that you haven't already provided in response to the previous questions, please provide them here.**

Comments: One typographical suggestion: On Page SAR-2 under "Industry Need", I believe "stand up" should be "start up".

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Mike Pfeister	
Organization:	Salt River Project	
Telephone:	602-236-3970	
E-mail:	Mike.Pfeister@srpnet.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 – Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 – RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 – Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 – Transmission-dependent Utilities
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Yes

No

Comments:

- 2. Do you agree with the scope of the proposed SAR? If not, please explain in the comment area.**

Yes

No

Comments:

- 3. Do you agree with the applicability of the SAR? If not, what functional entities do you think need to be added/deleted?**

Yes

No

Comments:

- 4. If you are aware of any Regional Variances associated with the proposed standard action, please identify them here**

Comments:

- 5. If you are aware of the need for a business practice to support the proposed standard action, please identify it here.**

Comments:

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Comments:

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(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 – Transmission Owners
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**Comment Form for First Draft of SAR for Certifying System Operators  
(Project 2007-04)**

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Group Comments (Complete this page if comments are from a group.)

**Group Name:** Southern Company Transmission

**Lead Contact:** Marc Butts

**Contact Organization:** Southern Company Services

**Contact Segment:** 1

**Contact Telephone:** 205-257-4839

**Contact E-mail:** mmbutts@southernco.com

Additional Member Name	Additional Member Organization	Region *	Segment *
James Ford	Southern Company Services	SERC	1
Jim Busbin	Southern Company Services	SERC	1
J. T. Wood	Southern Company Services	SERC	1
Roman Carter	Southern Company Services	SERC	1
Gary Gorham	Southern Company Services	SERC	1
Jim Griffith	Southern Company Services	SERC	1

\*If more than one Region or Segment applies, please list all. Regional acronyms and segment numbers are shown on prior page.

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**Comment Form for First Draft of SAR for Certifying System Operators  
(Project 2007-04)**

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*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

- 1. Do you agree that there is a reliability-related reason for the proposed SAR? If not, please explain in the comment area.**

Yes

No

Comments:

- 2. Do you agree with the scope of the proposed SAR? If not, please explain in the comment area.**

Yes

No

Comments: The scope is too broad. It should be modified to reflect the certification requirements for personnel who perform specific reliability tasks. Personnel who have the authority to independently perform one or more of those tasks on behalf of the functional entity should be certified. The standards drafting team should specify the reliability task that require certification of personnel.

- 3. Do you agree with the applicability of the SAR? If not, what functional entities do you think need to be added/deleted?**

Yes

No

Comments: This SAR should be limited to the Reliability Coordinator, Balancing Authority, Interchange Authority, Transmission Operator and Generator Operator (in some entities this is called "Market Operator") This is not to infer that an operator that works inside a power plant should be certified.

- 4. If you are aware of any Regional Variances associated with the proposed standard action, please identify them here**

Comments: We are not aware of any regional variances needed at this time.

- 5. If you are aware of the need for a business practice to support the proposed standard action, please identify it here.**

Comments:

- 6. If you have any other comments on this SAR that you haven't already provided in response to the previous questions, please provide them here.**

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Comments:



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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Karl A Bryan	
Organization:	US Army Corps of Engineers	
Telephone:	503-808-3894	
E-mail:	karl.a.bryan@usace.army.mil	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 – Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 – RTOs and ISOs
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- 1. Do you agree that there is a reliability-related reason for the proposed SAR? If not, please explain in the comment area.**

Yes

No

Comments:

- 2. Do you agree with the scope of the proposed SAR? If not, please explain in the comment area.**

Yes

No

Comments: What role will the Generator Owner play in this standard? Are there going to be requirements for certification of maintenance folks at the project as well as the relay technician? If not, why was the Generator Owner listed as a responsible entity under this standard?

I do agree with the requirement for certification of Generator Operators. The generator operators need to have a better understanding of the role they play in supporting the transmission system as well as they need to be certified in Black Start and Black Start capable operations.

- 3. Do you agree with the applicability of the SAR? If not, what functional entities do you think need to be added/deleted?**

Yes

No

Comments: I don't see where the Generator Owner has a role in this reliability standard.

- 4. If you are aware of any Regional Variances associated with the proposed standard action, please identify them here**

Comments:

- 5. If you are aware of the need for a business practice to support the proposed standard action, please identify it here.**

Comments:

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Comments:





NORTH AMERICAN ELECTRIC  
RELIABILITY CORPORATION

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Michael J. Roluti	
Organization:	U.S. Bureau of Reclamation	
Telephone:	303-445-3750	
E-mail:	mroluti@do.usbr.gov	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 – Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 – RTOs and ISOs
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1. Provide an adequate level of reliability for the North American bulk power systems — the standards are complete and the requirements are set at an appropriate level to ensure reliability.
2. Ensure the revised standard is enforceable as a mandatory reliability standard with financial penalties — the applicability to bulk power system owners, operators, and users, and as appropriate particular classes of facilities, is clearly defined; the purpose, requirements, and measures are results focused and unambiguous; the consequences of violating the requirements are clear.
3. Incorporate other general improvements described in the standards development work plan.
4. Consider comments received during the initial development of the standards and other comments received from ERO regulatory authorities and stakeholders.
5. Satisfy the standards procedure requirement for five-year review of the standard.

This SAR is intended to address the following:

- FERC Final Rule “Mandatory Reliability Standards for the Bulk-Power System, FERC Order 693” on the NERC standard PER-003
- To incorporate the necessary content, structure, and language to comply with the NERC standards process

Please review the SAR, provide your comments on this form, and then e-mail the form to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) by **August 15, 2007** with the words, “SO Certification SAR” in the subject line.



**Comment Form for First Draft of SAR for Certifying System Operators  
(Project 2007-04)**

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**You do not have to answer all questions. Enter All Comments in Simple Text Format.**

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

- 1. Do you agree that there is a reliability-related reason for the proposed SAR? If not, please explain in the comment area.**

Yes

No

Comments:

- 2. Do you agree with the scope of the proposed SAR? If not, please explain in the comment area.**

Yes

No

Comments: In the Detailed Description the SAR states: " The certification requirements for local transmission control center operators and local generation control center operators need to be identified and then the standard needs to be modified to address their certification." This request appears to be in direct opposition to the direction of the Commission. In Order 693 (P 1407) the Commission states that they " are persuaded not to require generator operators or transmission operators at local control centers to be NERC-certified at this time."

We recommend that certification requirements for local control centers not be developed. In the case of generator operators we recommend that certification requirements be determined only for real-time operational personnel located in a centralized generation control center that interfaces with the plants.

- 3. Do you agree with the applicability of the SAR? If not, what functional entities do you think need to be added/deleted?**

Yes

No

Comments: The standard currently applies to the reliability functions Transmission Operator, Balancing Authority, and Reliability Coordinator. In Order 693 (P1409) the Commission finds "...that the Reliability Standard serves an important reliability goal in requiring applicable entities to staff all operating positions that have a primary responsibility for real-time operations or are directly responsible for complying with the Reliability Standards with NERC-certified staff." The SAR seeks to expand the standard to include the additional reliability functions Generator Operator, Generator Owner, Transmission Owner, and Interchange Authority. We agree that including the Generator Operator function supports this reliability goal.

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However, we question the need to expand the applicability to Generator Owner and Transmission Owner. We have no comment regarding Interchange Authority.

NERC has defined (per Statement of Compliance Registry Criteria, Revision 3) the reliability function Transmission Owner as: “ the entity that owns and maintains transmission facilities” . Likewise the reliability function generator owner is defined as: “ the entity that owns and maintains generating units.

We fail to see how including these reliability functions serves to assure the credentials of those who have a primary responsibility for real-time operations. We recommend the reliability functions Generator Owner and Transmission Owner be dropped from the SAR.

**4. If you are aware of any Regional Variances associated with the proposed standard action, please identify them here**

Comments:

**5. If you are aware of the need for a business practice to support the proposed standard action, please identify it here.**

Comments:

**6. If you have any other comments on this SAR that you haven't already provided in response to the previous questions, please provide them here.**

Comments:

**Comment Form for First Draft of SAR for Certifying System Operators  
 (Project 2007-04)**

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Craig McLean	
Organization:	Manitobe Hydro	
Telephone:	204 487 5517	
E-mail:	cmclean@hydro.mb.ca	
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 – Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 – RTOs and ISOs
<input checked="" type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 – Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 – Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input checked="" type="checkbox"/>	5 – Electric Generators
<input type="checkbox"/> SERC	<input checked="" type="checkbox"/>	6 – Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 – Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 – Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 – Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 – Regional Reliability Organizations and Regional Entities



## Comment Form for First Draft of SAR for Certifying System Operators (Project 2007-04)

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Yes

No

Comments:

**2. Do you agree with the scope of the proposed SAR? If not, please explain in the comment area.**

Yes

No

Comments: Manitoba Hydro does not believe that the generator operators need to be NERC Certified. The generator operators are not responsible for the operation of the bulk electric system and do not act unilaterally in response to the bulk electric system. They take their direction from the Transmission Operator/Balancing Authority.

**3. Do you agree with the applicability of the SAR? If not, what functional entities do you think need to be added/deleted?**

Yes

No

Comments: Manitoba Hydro believes PER-003-0 applicability is right. The generation operators should not be added as they are not responsible for the operation of the bulk electric system. They do not act unilaterally in response to the bulk electric system but take their direction from the Transmission Operator/Balancing Authority who are and should remain the Certified System Operators.

**4. If you are aware of any Regional Variances associated with the proposed standard action, please identify them here**

Comments:

**5. If you are aware of the need for a business practice to support the proposed standard action, please identify it here.**

Comments:

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Comments: