

## Consideration of Comments on Second Draft of PER-003-1 - Operating Personnel Credentials — Project 2007-04

The Operating Personnel Credentials Standard Drafting Team thanks all commenters who submitted comments on the draft Operating Personnel Credentials standard (PER-003-1). The standard was posted for a 45-day public comment period from August 10, 2010 through September 24, 2010. The stakeholders were asked to provide feedback on the standards through a special Electronic Comment Form. There were 33 sets of comments, including comments from more than 87 different people from approximately 32 companies representing 8 of the 10 Industry Segments as shown in the table on the following pages.

Based on the comments received the drafting team made the following changes to the proposed Standard:

- Modified the footnote to provide additional clarity.
- Modified Measure M1.3 to provide additional clarity.
- Corrected the second footnote to use the same wording as the first footnote.

There were several minority issues that the team was unable to resolve, including the following:

- Several stakeholders objected to the standards reference to "competencies." The team is required to address the FERC directive from Order 693 that states that the standard must identify the minimum competencies operating personnel must demonstrate to be certified. The team met with FERC staff and confirmed that the directive does intend for competencies to be identified in the standard.
- Several stakeholders objected to the use of the term "System Operator" because the NERC Glossary definition contains the 'Generator Operator' within the parenthetical. The team explained that while the definition of the term System Operator in the NERC Glossary includes the parenthetical expression "(Balancing Authority, Transmission Operator, Generator Operator, Reliability Coordinator)," the applicability of the standard is clearly stated to be Reliability Coordinator, Balancing Authority, and Transmission Operator.
- Several stakeholders wanted the Measure to be re-worded to only include the System Operators name and NERC certificate number as proof of compliance. The team explained that the Measure as currently written already allowed for either "a copy of each of its System Operator's NERC Certificate" OR "NERC certificate number with expiration date". The team further explained that this was done to allow the entity being audited to determine the method that best suits its needs.
- Several stakeholders want the VSLs to be graduated and the team did not change the VSLs. The VSLs proposed meet both NERC and FERC VSL Guidelines.
- A few stake holders wanted the ERO to be required to create and maintain a certification program that meets the minimum competencies identified within the standard. The team explained that NERC, the ERO, currently provides the System Operator Certification program on which this standard is based. They further explained that the program, by design, was autonomous and that this program was already included in the NERC Rules of Procedure. The team further stated that they felt placing a requirement in a standard for the ERO to provide this System Operator Certification program compromises the autonomy of this program and weakens it.

In this "Consideration of Comments" document stakeholder comments have been organized so that it is easier to see the responses associated with each question. All comments received can be viewed in their original format at:

[http://www.nerc.com/filez/standards/Certifying\\_SOs\\_Project\\_2007-04.html](http://www.nerc.com/filez/standards/Certifying_SOs_Project_2007-04.html)

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Vice President and Director of Standards, Herb Schrayshuen, at 609-452-8060 or at [herb.schrayshuen@nerc.net](mailto:herb.schrayshuen@nerc.net). In addition, there is a NERC Reliability Standards Appeals Process.<sup>1</sup>

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<sup>1</sup> The appeals process is in the Reliability Standards Development Procedures:  
<http://www.nerc.com/standards/newstandardsprocess.html>.

## Index to Questions, Comments, and Responses

1. The SDT has modified the Purpose statement of the draft standard. The Purpose statement now reads "To ensure that System Operators performing the reliability-related tasks of the Reliability Coordinator, Balancing Authority or Transmission Operator are certified through the NERC System Operator Certification Program when filling a Real-time operating position responsible for control of the Bulk Electric System". . . . .	10
2. Although the industry as a whole did not request additional time for the implementation of this standard, the SDT responded to those entities that requested additional time. The SDT determined that there may be instances where existing certificate holders may need to obtain a different certificate, and, consequently, modified the effective date of the draft standard to be twelve months after regulatory approval/or BOT approval where there is no regulatory approval required. . . . .	13
3. The SDT has modified the body of all three Requirements to provide additional clarity as to who is to be certified. The body of the Requirement(s) now reads: "Each [operating entity] shall staff its Real-time operating positions performing [operating entity] reliability-related tasks with System Operators who have demonstrated minimum competency in the areas listed by obtaining and maintaining one of the following valid NERC certificates". . . . .	17
4. The SDT has modified the Measure to better align with the Requirement(s). The Measure now reads "Each Reliability Coordinator, Transmission Operator and Balancing Authority shall have the following evidence to show that it staffed its Real-time operating positions performing reliability-related tasks with System Operators who have demonstrated the applicable minimum competency by obtaining and maintaining the appropriate, valid NERC certificate (R1, R2, R3): M1.1 A list of Real-time operating positions. M1.2 A list of System Operators assigned to its Real-time operating positions. M1.3 A copy of each of its System Operator's NERC certificate or NERC certificate number with expiration date. M1.4 Work schedules, work logs, or other equivalent evidence showing which System Operators were assigned to work in Real-time operating positions. . . . .	29
5. Please provide any other comments (that you have not already provided in response to the questions above) that you have on the draft standard PER-003-1. . . . .	30

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The Industry Segments are:

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
1.	Group	Guy Zito	Northeast Power Coordinating Council	10									
	<b>Additional Member</b>	<b>Additional Organization</b>	<b>Region</b>	<b>Segment Selection</b>									
1.	Alan Adamson	NY State Reliability Council	NPCC	10									
2.	Gregory Campoli	New York ISO	NPCC	2									
3.	Kurtis Chong	Independent Electricity System Operator	NPCC	2									
4.	Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1									
5.	Chris de Graffenried	Consolidated Edison Co. of New York, Inc.	NPCC	1									

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Group/Individual	Commenter	Organization	Registered Ballot Body Segment																	
			1	2	3	4	5	6	7	8	9	10								
6.	Gerry Dunbar	NPCC	NPCC	10																
7.	Dean Ellis	Dynegy Generation	NPCC	5																
8.	Brian Evans-Mongeon	Utility Services	NPCC	8																
9.	Brian Gooder	Ontario Power Generation Incorp	NPCC	5																
10.	Kathleen Goodman	ISO New England	NPCC	2																
11.	Chantel Haswell	FPL Group	NPCC	5																
12.	David Kiguel	Hydro One Networks	NPCC	1																
13.	Michael Lombardi	Northeast Utilities	NPCC	1																
14.	Randy MacDonald	New Brunswick System Operator	NPCC	2																
15.	Bruce Metruck	NY Power Authority	NPCC	6																
16.	Lee Pedowicz	NPCC	NPCC	10																
17.	Robert Pellegrini	The United Illuminating Co	NPCC	1																
18.	Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1																
19.	Saurabh Saksena	National Grid	NPCC	1																
20.	Michael Schiavone	National Grid	NPCC	1																
21.	Peter Yost	Consolidated Edison	NPCC	3																
22.	Mike Garton	Dominion Resources Services	NPCC	5																

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Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
2.	Group	Deborah Schaneman	Platte River Power Authority	1, 3, 6									
<b>Additional Member</b>		<b>Additional Organization</b>	<b>Region</b>	<b>Segment Selection</b>									
1.	Jeff Landis	Platte River Power Authority	WECC	1,3,6									
3.	Group	Denise Koehn	Bonneville Power Administration	1, 3, 5, 6									
<b>Additional Member</b>		<b>Additional Organization</b>	<b>Region</b>	<b>Segment Selection</b>									
1.	Bernie O'Connell	BPA, Transmission Dispatch	WECC	1									
4.	Group	Mike Garton	Electric Market Policy	1, 3, 5, 6									
<b>Additional Member</b>		<b>Additional Organization</b>	<b>Region</b>	<b>Segment Selection</b>									
1.	Michael Gildea	Dominion Resources Services	SERC	3									
2.	Louis Slade	Dominion Resources Services	RFC	6									
3.	John Loftis	Dominion Virginia Power	SERC	1									
5.	Group	Sam Ciccone	FirstEnergy	1, 3, 4, 5, 6									
<b>Additional Member</b>		<b>Additional Organization</b>	<b>Region</b>	<b>Segment Selection</b>									
1.	Jim Eckels	FE	RFC	1									
2.	Steve Megay	FE	RFC	1									

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Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
3. Doug Hohlbaugh		FE	RFC	1									
6.	Group	Carol Gerou	MRO's NERC Standards Review Subcommittee	10									
	<b>Additional Member</b>	<b>Additional Organization</b>	<b>Region</b>	<b>Segment Selection</b>									
1.	Mahmood Safi	Mahmood Safi	MRO	1,3,5,6									
2.	Chuck Lawrence	American Transmission Co.	MRO	1									
3.	Tom Webb	WPS Corporation	MRO	3,4,5,6									
4.	John Marshall	Midwest ISO	MRO	2									
5.	Jodi Jensen	Western Area Power Admin.	MRO	1,6									
6.	Ken Goldsmith	Alliant Energy	MRO	4									
7.	Dave Rudolf	Basin Electric Power Cooperative	MRO	1,3,5,6									
8.	Eric Ruskamp	Lincoln Electric System	MRO	1,3,5,6									
9.	Joseph Knight	Great River Energy	MRO	1,3,5,6									
10.	Joe DePoorter	Madison Gas & Electric	MRO	3,4,5,6									
11.	Scott Nickels	Rochester Public Utilities	MRO	4									
12.	Terry Harbour	MidAmerican Energy	MRO	1,3,5,6									
7.	Group	Jason Marshall	Midwest ISO Standards Collaborators	2									
	<b>Additional Member</b>	<b>Additional Organization</b>	<b>Region</b>	<b>Segment</b>									

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Group/Individual		Commenter	Organization		Registered Ballot Body Segment									
					1	2	3	4	5	6	7	8	9	10
				<b>Selection</b>										
1.	Joe Knight	Great River Energy	MRO	1,3,5,6										
2.	Jim Cyrulewski	JDRJC Associates	RFC	8										
8.	Group	Margaret Stambach	SERC OC-SOS Standards Review Group		1, 3, 5, 9, 10									
	<b>Additional Member</b>	<b>Additional Organization</b>	<b>Region</b>	<b>Segment Selection</b>										
1.	Gerry Beckerle	Ameren	SERC	1,3										
2.	Robert Thomasson	Big Rivers Electric	SERC	1,2,5,9										
3.	Angela Park	Dominion	SERC	1,3										
4.	Sam Holeman	Duke Energy	SERC	1,3,5										
5.	Greg Rowland	Duke Energy	SERC	1,3,5										
6.	Andy Burch	Electric Energy	SERC	1,5										
7.	Larry Rodriquez	Entegra Power	SERC	5										
8.	Mark Brown	Entergy Transmission	SERC	1,3										
9.	Jim Case	Entergy Transmission	SERC	1,3										
10.	Wayne Mitchell	Entergy Transmission	SERC	1,3										
11.	Melinda Montgomery	Entergy Transmission	SERC	1,3										
12.	Barry Hardy	OMU	SERC	1,3,5										
13.	Bill Thigpen	PowerSouth	SERC	1,3,5										
14.	John Lemire	Progress Energy	SERC	1,3,5										
15.	Gene Delk	SCE&G	SERC	1,3,5										

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Group/Individual		Commenter	Organization	Registered Ballot Body Segment																
				1	2	3	4	5	6	7	8	9	10							
16.	Steve Hebert	SCE&G	SERC 1,3,5																	
17.	John Rembold	SIPC	SERC 1,3,5																	
18.	Randy Castello	Sothern Company	SERC 1,3,5																	
19.	Rocky Williamson	Southern Company	SERC 1,3,5																	
20.	Sam Austin	TVA	SERC 1,3,5,9																	
21.	Edd Forsythe	TVA	SERC 1,3,5,9																	
22.	Joe Wise	TVA	SERC 1,3,5,9																	
9.	Individual	Silvia Parada Mitchell	NextEra Energy	x		x		x	x											
10.	Individual	Andy Tillery	Southern Company	x		x														
11.	Individual	Brad Pederson	Portland General Electric	x																
12.	Individual	Dan Rochester	Independent Electricity System Operator		x															
13.	Individual	Michael Lombardi	Northeast Utilities	x		x		x												
14.	Individual	Joylyn Faust	Consumers Energy			x	x	x												
15.	Individual	Edward c. Stein	Self																x	
16.	Individual	Joe O'Brien	NIPSCO	x		x		x	x											
17.	Individual	John Bee	Exelon	x		x		x												
18.	Individual	Jonathan Appelbaum	The United Illuminating Company	x																

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Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
19.	Individual	Kasia Mihalchuk	Manitoba Hydro	x		x		x	x				
20.	Individual	Greg Rowland	Duke Energy	x		x		x	x				
21.	Individual	RoLynda Shumpert	South Carolina Electric and Gas	x		x		x	x				
22.	Individual	Matt Brewer	San Diego Gas and Electric Co.	x		x		x	x				
23.	Individual	Jon Kapitz	Xcel Energy	x		x		x					
24.	Individual	Thad Ness	American Electric Power (AEP)	x		x		x	x				
25.	Individual	Ed Davis	Entergy Services	x		x		x	x				
26.	Individual	Eric Senkowicz	FRCC Manager of Operations										x
27.	Individual	Matt Stryjewski	BGE	x									
28.	Individual	Laura Zotter	ERCOT ISO		x								
29.	Individual	Tony Kroskey	Brazos Electric Power Cooperative, Inc.	x									
30.	Individual	Martin Bauer	US Bureau of Reclamation					x					
31.	Individual	Steve Toth	Covanta Energy					x					
32.	Individual	Darryl Curtis	Oncor Electric Delivery	x									
33.	Individual	Val Lehner	ATC	x									

1. The SDT has modified the Purpose statement of the draft standard. The Purpose statement now reads “To ensure that System Operators performing the reliability-related tasks of the Reliability Coordinator, Balancing Authority or Transmission Operator are certified through the NERC System Operator Certification Program when filling a Real-time operating position responsible for control of the Bulk Electric System”.

**Do you agree that the modified Purpose statement provides greater clarity as to who is affected and how certification is to be accomplished? If not, please explain in the comment area.**

**Summary Consideration:** One commenter felt that the NERC System Operator Certification Program needed to be defined. The SDT explained that the Program was already defined in both the Rules and Procedures Section 600 and Appendix 6. Another commenter was in agreement with the Purpose Statement but felt that it was still a little vague as to who needed to be certified. The SDT explained that the SDT felt it was very clearly stated and that the majority of the industry supported their belief.

Organization	Yes or No	Question 1 Comment
San Diego Gas and Electric Co.	No	The term “NERC System Operator Certification Program” needs to be defined.
<b>Response:</b> The NERC System Operator Certification Program is a defined program in both the Rules of Procedure Section 600 & System Operator Certification Program Manual, Appendix 6.		
Portland General Electric	Yes	PGE agrees with WECC Position Paper for the Ballot of PER-003-1 - Certifying System Operators
<b>Response:</b> The SDT thanks you for your affirmative response and clarifying comment.		
NIPSCO	Yes	Yes & No, it’s still vague who must be certified and in the SAR it was suggested that this issue be addressed as it relates to the 2006 unapproved interpretation. However, from a compliance point of view we’re not sure if this is a bad thing.
<b>Response:</b> The SDT thanks you for your affirmative response and clarifying comment. However, the majority of the industry supported the SDT’s position on this subject.		

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Organization	Yes or No	Question 1 Comment
Northeast Power Coordinating Council	Yes	
Platte River Power Authority	Yes	
Bonneville Power Administration	Yes	
Electric Market Policy	Yes	
FirstEnergy	Yes	
MRO's NERC Standards Review Subcommittee	Yes	
Midwest ISO Standards Collaborators	Yes	
SERC OC-SOS Standards Review Group	Yes	
NextEra Energy	Yes	
Southern Company	Yes	
Independent Electricity System Operator	Yes	
Northeast Utilities	Yes	
Consumers Energy	Yes	
Edward c. Stein	Yes	
Exelon	Yes	

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Organization	Yes or No	Question 1 Comment
The United Illuminating Company	Yes	
Manitoba Hydro	Yes	
Duke Energy	Yes	
South Carolina Electric and Gas	Yes	
Xcel Energy	Yes	
American Electric Power (AEP)	Yes	
Entergy Services	Yes	
FRCC Manager of Operations	Yes	
ERCOT ISO	Yes	
Brazos Electric Power Cooperative, Inc.	Yes	
US Bureau of Reclamation	Yes	
Covanta Energy	Yes	
Oncor Electric Delivery	Yes	
ATC	Yes	

2. Although the industry as a whole did not request additional time for the implementation of this standard, the SDT responded to those entities that requested additional time. The SDT determined that there may be instances where existing certificate holders may need to obtain a different certificate, and, consequently, modified the effective date of the draft standard to be twelve months after regulatory approval/or BOT approval where there is no regulatory approval required.

Do you agree that this additional time is sufficient for all entities to comply with the standard? If not, please explain in the comment area.

**Summary Consideration:** One commenter stated that they felt implementation period should be 18 months instead of 12 months. The SDT explained that it had extended the initial implementation period to twelve months based on comments received during the first comment period. The SDT further explained that the majority of the industry supported the twelve month implementation period.

Organization	Yes or No	Question 2 Comment
Brazos Electric Power Cooperative, Inc.	No	Should allow up to 18 months.
<b>Response:</b> As a result of the first posting, the SDT modified the effective date to twelve months in the event that some currently certified personnel may not hold the proper NERC certificate as defined by this standard which the majority of the industry supported during this comment period.		
Portland General Electric	Yes	PGE agrees with WECC Position Paper for the Ballot of PER-003-1 - Certifying System Operators
<b>Response:</b> The SDT thanks you for your affirmative response and clarifying comment.		
Consumers Energy	Yes	12 months is adequate, but not less than 12 months.
<b>Response:</b> The SDT thanks you for your affirmative response and clarifying comment.		
NIPSCO	Yes	Time seems adequate
<b>Response:</b> The SDT thanks you for your affirmative response and clarifying comment.		

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Organization	Yes or No	Question 2 Comment
Northeast Power Coordinating Council	Yes	
Platte River Power Authority	Yes	
Bonneville Power Administration	Yes	
Electric Market Policy	Yes	
FirstEnergy	Yes	
MRO's NERC Standards Review Subcommittee	Yes	
Midwest ISO Standards Collaborators	Yes	
SERC OC-SOS Standards Review Group	Yes	
NextEra Energy	Yes	
Southern Company	Yes	
Independent Electricity System Operator	Yes	
Northeast Utilities	Yes	
Edward c. Stein	Yes	
Exelon	Yes	
The United Illuminating Company	Yes	

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Organization	Yes or No	Question 2 Comment
Manitoba Hydro	Yes	
Duke Energy	Yes	
South Carolina Electric and Gas	Yes	
San Diego Gas and Electric Co.	Yes	
American Electric Power (AEP)	Yes	
Entergy Services	Yes	
FRCC Manager of Operations	Yes	
ERCOT ISO	Yes	
Covanta Energy	Yes	
Oncor Electric Delivery	Yes	
ATC	Yes	
Xcel Energy		None

**3. The SDT has modified the body of all three Requirements to provide additional clarity as to who is to be certified. The body of the Requirement(s) now reads:**

**“Each [operating entity] shall staff its Real-time operating positions performing [operating entity] reliability-related tasks with System Operators who have demonstrated minimum competency in the areas listed by obtaining and maintaining one of the following valid NERC certificates”.**

**Do you agree that this modification clearly states who is to be certified and clarifies that the obtaining and maintaining the certificate is how competence is demonstrated? If not, please explain in the comment area.**

**Summary Consideration:** The majority of the commenters felt that minimum competencies should not be included in the standard and that the use of the term “System Operator” either should not be used in the standard or should be re-defined to exclude Generator Operators in the NERC Glossary definition. FERC Order 693 contains a directive to modify the PER-003 standard to include minimum competencies. The SDT believes that the “Areas of Competency” as used in the proposed standard represent the most efficient and effective method for meeting this FERC directive. The “Areas of Competency” identified in this standard are, by design, at a high enough level to ensure they will be included in any exam the NERC Certification Program will use both now and in the future. In addition, recertification through training will also touch upon one or more of these areas ensuring that anyone maintaining a valid NERC Certification has enhanced their ability to operate the Bulk Electric System.

Regarding the comment concerning the use of the term System Operator, while the definition of the term ‘System Operator’ in the NERC Glossary is included in the parenthetical expression “(Balancing Authority, Transmission Operator, Generator Operator, Reliability Coordinator),” the applicability of the standard is clearly stated to be Reliability Coordinator, Balancing Authority, and Transmission Operator. In addition, there is a separate effort underway to remove the reference to “Generator Operator” from the definition of System Operator.

A few of the commenters were concerned that the minimum competencies were not directly expressed in the measures and questioned the formatting used in the Requirements. The “Areas of Competency” are implicitly included in Measure M1 by the statement “demonstrated the applicable minimum competency by obtaining and maintaining the appropriate, valid NERC certificate”.

Concerning the question on the formatting used in the Requirements, the formatting used in this draft standard is consistent with the guidance provided by NERC staff.

A couple of the commenters wanted to change the phrase “performing reliability-related tasks” to “meeting its functional obligations”. The SDT explained that the phrase “meeting its functional obligations” as described in the functional model, could

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include tasks that are not reliability related and also tasks that are not required to be performed by System Operators and therefore, did not revise the standard to reflect this modification.

A couple of other commenters questioned if the footnote carried the same weight as if it were included as part of the requirements (i.e. could an entity still be found non-compliant for having a non-certified trainee learning or observing?). The SDT explained that it was their determination, based on the Standards Committee’s guidance, that the footnote would carry the same weight as the Requirement to which it is attached. The SDT further explained that the answer to their question “could an entity still be found non-compliant for having a non-certified trainee learning or observing?” is no, they would not be found non-compliant. The footnote was modified to provide further clarity and the footnote now reads “Non-NERC certified personnel performing any reliability-related task of a real-time operating position must be under the direct supervision of a NERC Certified System Operator stationed at that operating position; the NERC Certified System Operator at that operating position has ultimate responsibility for the performance of the reliability-related tasks”.

Organization	Yes or No	Question 3 Comment
Electric Market Policy	No	<p>Dominion recommends changes to the above sentence to read as follows; “System Operators who have obtained and maintain one of the following valid NERC certificates:” Dominion suggests the phrase ‘in the areas listed’ implies something that can be construed by an auditor as something measurable. R1. and R2. both contain ‘Areas of Competency’ which an auditor could interpret as sub requirements. They are not explicitly represented in the measures section as it currently exists. The ‘Areas of Competency’ are included in the NERC SO examination. Inserting “obtained and maintain” simplifies the standard. ‘Obtaining and maintaining’ are used in the measures section (M1.).</p>
<p><b>Response:</b> FERC Order 693 contains a directive to modify the PER-003 standard to include minimum competencies. The SDT believes that the “Areas of Competency” as used in the proposed standard represents the most efficient and effective method of meeting this FERC directive. The “Areas of Competency” identified in this standard are, by design, at a high enough level to ensure they will be included in any exam the NERC Certification Program would use both now and in the future. In addition, recertification through training would also touch upon one or more of these areas ensuring that anyone maintaining a valid NERC Certification has enhanced their ability to operate the Bulk Electric System.</p> <p>You are correct that the “Areas of Competency” are not explicitly included in the Measure M1. However, the SDT believes that the “Areas of Competency” are implicitly included in the Measure M1 by the statement “demonstrated the applicable minimum competency by obtaining and maintaining the appropriate, valid NERC certificate”.</p>		
MRO's NERC Standards Review Subcommittee	No	<p>The NSRS recommends that the SDT changes “performing reliability-related tasks” to “meeting its functional obligations” to reflect recent changes made to other approved standards.</p> <p>In addition, the definition of “System Operator” includes “Generator Operator”, however generator operators</p>

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Organization	Yes or No	Question 3 Comment
		<p>are not covered in any specific requirement in the standard. We believe the term “Generator Operator” should be removed from the definition of “System Operator”, or specifically noted as not applicable for this standard, to remove any ambiguity in the implementation of this standard. The NSRS would also like to point out the Generator Operator is the Registered Entity that meet the obligations set in the NERC Statement of Compliance Registry Criteria (Revision 5.0) and not a person operating a generator.</p>
<p><b>Response:</b> The wording, “meeting its functional obligations” as described in the functional model, may include tasks that are not reliability-related and also tasks that are not required to be performed by System Operators; therefore the SDT does not see a need to revise the standard.</p> <p>While the definition of the term System Operator in the NERC Glossary includes the parenthetical expression “(Balancing Authority, Transmission Operator, Generator Operator, Reliability Coordinator),” the applicability of the standard is clearly stated to be Reliability Coordinator, Balancing Authority, and Transmission Operator. There is a separate effort underway to remove the reference to “Generator Operator” from the definition of System Operator.</p>		
Midwest ISO Standards Collaborators	No	<p>To be consistent with other recently approved standards, we suggest changing “performing reliability-related tasks” to “meeting its functional obligations”. This is the language used in the recently approved R1 EOP-008-1 and then ties the requirement back to the functional model which is task specific.</p> <p>We do also note that the term System Operator includes generator operators in the definition. However, generator operators are not covered in the standard in a specific requirement. This could cause some confusion on exactly to whom that standard applies.</p>
<p><b>Response:</b> The wording, “meeting its functional obligations” as described in the functional model, may include tasks that are not reliability-related and also tasks that are not required to be performed by System Operators; therefore the SDT does not see a need to revise the standard.</p> <p>While the definition of the term System Operator in the NERC Glossary includes the parenthetical expression “(Balancing Authority, Transmission Operator, Generator Operator, Reliability Coordinator),” the applicability of the standard is clearly stated to be Reliability Coordinator, Balancing Authority, and Transmission Operator. There is a separate effort underway to remove the reference to “Generator Operator” from the definition of System Operator.</p>		
SERC OC-SOS Standards Review Group	No	<p>Our group continues to believe that the term “competency” should not be used to describe an operator who has simply become certified through the NERC System Operator Certification Program. The certification process only assures that an operator is “capable” of perform reliability-related tasks. To deem the operator “competent” in performing such tasks, one would have to observe performance over a long period of time and under unexpected operating conditions. Changing the word “competency” to “capability” would make the statement above accurate.</p> <p>We also see the listing of specific technical areas under each requirement as problematic and prescriptive. By listing the areas, a process is set up that will potentially be very hard to manage. If a topic needs to be added or subtracted, the exam would be changed accordingly; however, then the standard would have to be changed, including creation of a SAR followed by industry comment, balloting periods, and approvals. The</p>

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Organization	Yes or No	Question 3 Comment
		<p>areas of capability for each function are all included in the certification exam requirements, and need not be listed in this draft standard. Furthermore, the fact that each technical area is numbered indicates that each one is a sub-requirement of the standard. Yet, there are no measures associated with the technical areas. So how can it be determined that an entity is compliant or non-compliant with this part of the standard? Our group suggests that the standard drafting team consider making the following changes to each of the three requirements:-- In the requirement statement, replace the word "competency" with "capability" and strike the phrase "in the areas listed".-- Strike the section "Areas of Competency". If these technical areas must be listed, change the heading to "Areas of Capability", use bullets instead of numbers, and move to an appendix of this standard.</p>
<p><b>Response:</b> FERC Order 693 contains a directive to modify the PER-003 standard to include minimum competencies. The SDT believes that the "Areas of Competency" as used in the proposed standard represents the most efficient and effective method of meeting this FERC directive. The drafting team believes that the NERC Certification program provides the foundation for the minimum competency that a person must possess to operate the Bulk Electric System reliably. The "Areas of Competency" identified in this standard are, by design, at a high enough level to ensure they will be included in any exam the NERC Certification Program would use both now and in the future. In addition, recertification through training would also touch upon one or more of these areas ensuring that anyone maintaining a valid NERC Certification has enhanced their ability to operate the Bulk Electric System.</p> <p>You are correct that the "Areas of Competency" are not explicitly included in the Measure M1. However, the SDT believes that the "Areas of Competency" are implicitly included in the Measure M1 by the statement "demonstrated the applicable minimum competency by obtaining and maintaining the appropriate, valid NERC certificate".</p>		
Southern Company	No	<p>We believe the term "competency" should be changed to "capability" to more accurately reflect the purpose of the statement. The certification process assures that an operator is "capable" of performing reliability related tasks, not that the operator is "competent" in performing those tasks. In order to determine "competency", the operator would need to be observed over a long period of time to capture performance measures during various unexpected operating conditions. Therefore, the term "competency" should not be used in describing an operator who has simply been certified through the NERC System Operator Certification Program. Therefore we suggest changing the term "competency" to "capability" in each of the three requirements</p> <p>We believe that listing the specific technical "Areas of Competency" under each requirement will be problematic and very hard to manage. By this method, in order to change a topic on the exam, you would also have to change the standard, creating a new SAR, comment period, ballot, and approval. The technical capabilities are already listed in the exam and should be left there where they are more easily updated. Further issues with this draft listing the "Areas of Competency" are that each listed area is numbered as a sub-requirement of the standard, yet no measure exists that is related to each of these sub-requirements. This in effect creates an issue of how to determine compliance. Therefore, we suggest striking the entire sub-section "Areas of Competency" from each of the three requirements. However, if the drafting team chooses to keep these sections, we request the heading be changed to "Areas of Capability" (in line with our previous</p>

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Organization	Yes or No	Question 3 Comment
		comment), that bullets be used instead of numbers, and that the list be moved to the appendix instead of being listed as a sub section in each of the three requirements.
<p><b>Response:</b> FERC Order 693 contains a directive to modify the PER-003 standard to include minimum competencies. The SDT believes that the “Areas of Competency” as used in the proposed standard represents the most efficient and effective method of meeting this FERC directive. The drafting team believes that the NERC Certification program provides the foundation for the minimum competency that a person must possess to operate the Bulk Electric System reliably. The “Areas of Competency” identified in this standard are, by design, at a high enough level to ensure they will be included in any exam the NERC Certification Program would use both now and in the future. In addition, recertification through training would also touch upon one or more of these areas ensuring that anyone maintaining a valid NERC Certification has enhanced their ability to operate the Bulk Electric System.</p> <p>You are correct that the “Areas of Competency” are not explicitly included in the Measure M1. However, the SDT believes that the “Areas of Competency” are implicitly included in the Measure M1 by the statement “demonstrated the applicable minimum competency by obtaining and maintaining the appropriate, valid NERC certificate”.</p>		
NextEra Energy	No	<p>Suggest the following edits to clarify further and be consistent with standards formatting:</p> <p>R1. Each Reliability Coordinator shall staff its Real-time operating positions performing Reliability Coordinator reliability-related tasks with System Operators who have demonstrated minimum competency in the areas listed in R1.1 below, by obtaining and maintaining a valid NERC Reliability Operator certificate (1[Risk Factor: High][Time Horizon: Real-time Operations]R1.1. Areas of competency (based on exam content outline)  R1.1.1. Resource and demand balancing R1.1.2. Transmission operations R1.1.3. Emergency preparedness and operations R1.1.4. System operations R1.1.5. Protection and control R1.1.6. Voltage and reactive R1.1.7. Interchange scheduling and coordination R1.1.8. Interconnection reliability operations and coordination</p> <p>R2. Each Transmission Operator shall staff its Real-time operating positions performing Transmission Operator reliability-related tasks with System Operators who have demonstrated minimum competency in the areas listed in R2.1 below, by obtaining and maintaining one of the valid NERC certificates listed in R2.2 below. (1) : [Risk Factor: High][Time Horizon: Real-time Operations]: R2.1. Areas of competency (based on exam content outline) R2.1.1. Transmission operations R2.1.2. Emergency preparedness and operations R2.1.3. System operations R2.1.4. Protection and control R2.1.5. Voltage and reactive R2.2. Certificates R2.2.1 Reliability Operator R2.2.2 Balancing, Interchange and Transmission Operator R2.2.3 Transmission Operator</p> <p>R3. Each Balancing Authority shall staff its Real-time operating positions performing Balancing Authority reliability-related tasks with System Operators who have demonstrated minimum competency in the areas listed in R3.1 below, by obtaining and maintaining one of the valid NERC certificates listed in R3.2 below.(1) : [Risk Factor: High][Time Horizon: Real-time Operations]: R3.1. Areas of competency (based on exam content outline) R3.1.1. Resources and demand balancing R3.1.2. Emergency preparedness and operations R3.1.3. System operations R3.1.4. Interchange scheduling and coordination R3.2. Certificates R3.2.1 Reliability</p>

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Organization	Yes or No	Question 3 Comment
		Operator R3.2.2 Balancing, Interchange and Transmission Operator R3.2.3 Balancing and Interchange Operator
<p><b>Response:</b> The SDT appreciates your comment. However, the formatting used in this draft standard is consistent with the guidance provided by NERC staff. NERC no longer places an “R” in front of sub-requirements; and sub-requirements are now called “Parts” of a requirement.</p>		
FRCC Manager of Operations	No	<p>Suggest the following edits to clarify further and be consistent with standards formatting and capitalization of defined terms:</p> <p>R1. Each Reliability Coordinator shall staff its Real-time operating positions performing Reliability Coordinator reliability-related tasks with System Operators who have demonstrated minimum competency in the areas listed in R1.1 below, by obtaining and maintaining a valid NERC Reliability Operator certificate (1[Risk Factor: High][Time Horizon: Real-time Operations]R1.1. Areas of Ccompetency (based on exam content outline) R1.1.1. Resource and demand balancing R1.1.2. Transmission operations R1.1.3. Emergency preparedness and operations R1.1.4. System operations R1.1.5. Protection and control R1.1.6. Voltage and reactive R1.1.7. Interchange scheduling and coordination R1.1.8. Interconnection reliability operations and coordination</p> <p>R2. Each Transmission Operator shall staff its Real-time operating positions performing Transmission Operator reliability-related tasks with System Operators who have demonstrated minimum competency in the areas listed in R2.1 below, by obtaining and maintaining one of the valid NERC certificates listed in R2.2 below. (1) : [Risk Factor: High][Time Horizon: Real-time Operations]: R2.1. Areas of competency (based on exam content outline) R2.1.1. Transmission operations R2.1.2. Emergency preparedness and operations R2.1.3. System operations R2.1.4. Protection and control R2.1.5. Voltage and reactive R2.2. Certificates R2.2.1 Reliability Operator R2.2.2 Balancing, Interchange and Transmission Operator R2.2.3 Transmission Operator</p> <p>R3. Each Balancing Authority shall staff its Real-time operating positions performing Balancing Authority reliability-related tasks with System Operators who have demonstrated minimum competency in the areas listed in R3.1 below, by obtaining and maintaining one of the valid NERC certificates listed in R3.2 below.(1) : [Risk Factor: High][Time Horizon: Real-time Operations]: R3.1. Areas of competency (based on exam content outline) R3.1.1. Resources and demand balancing R3.1.2. Emergency preparedness and operations R3.1.3. System operations R3.1.4. Interchange scheduling and coordination R3.2. Certificates R3.2.1 Reliability Operator R3.2.2 Balancing, Interchange and Transmission Operator R3.2.3 Balancing and Interchange Operator</p>
<p><b>Response:</b> The SDT appreciates your comment. However, the formatting used in this draft standard is consistent with the guidance provided by NERC staff. NERC no longer places an “R” in front of sub-requirements; and sub-requirements are now called “Parts” of a requirement.</p>		

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Organization	Yes or No	Question 3 Comment
Duke Energy	No	<ul style="list-style-type: none"> <li>o R1, R2 and R3 - Strike the phrase “in the areas listed” from each requirement, and delete Sections 1.1, 2.1 and 3.1. We believe that listing the Areas of Competency in these three requirements is unnecessary to satisfy the Order 693 directive, since the requirements clearly link competency to NERC certification, and the Operator Certification program documents list the Areas of Competencies. Also if the Areas of Competency were ever modified, then you’d have to generate a revision to the standard. We believe that incorporating them by reference is a better way.</li> <li>o If the SDT decides that the Areas of Competency must be listed in the standard, then they should be bulleted and not numbered like sub-requirements, because you can’t graduate VSLs for the requirement based upon them.</li> <li>o R2 and R3 - The Certificates should be included in the text of the requirements and not numbered like sub-requirements. If the Areas of Competency are deleted, then you could leave the Certificates under the requirements, but if so they should be bulleted and not numbered like sub-requirements.</li> </ul> <p>Also, delete the phrase “Part 2.2” from the R2 VSL and delete the phrase “Part 3.2” from the R3 VSL.</p> <ul style="list-style-type: none"> <li>o R1 and R2 Footnote - we agree with this clarifying footnote, but question whether it carries the same weight as if it were included as part of the requirements (i.e. could an entity still be found non-compliant for having a non-certified trainee learning or observing?).</li> </ul>

**Response:** FERC Order 693 contains a directive to modify the PER-003 standard to include minimum competencies. The SDT believes that the “Areas of Competency” as used in the proposed standard represents the most efficient and effective method of meeting this FERC directive. The drafting team believes that the NERC Certification program provides the foundation for the minimum competency that a person must possess to operate the Bulk Electric System reliably. The “Areas of Competency” identified in this standard are, by design, at a high enough level to ensure they will be included in any exam the NERC Certification Program would use both now and in the future. In addition, recertification through training would also touch upon one or more of these areas ensuring that anyone maintaining a valid NERC Certification has enhanced their ability to operate the Bulk Electric System.

The SDT appreciates your comments concerning the formatting used in the proposed draft standard. However, the formatting used in this draft standard is consistent with the guidance provided by NERC staff.

Regarding your concern about sub-requirements and graduated VSLs, the SDT has modified the Measure M1.3 to provide clarification. The Measure M1.3 now reads “A copy of each of its System Operator’s NERC certificate or NERC certificate number with expiration date which demonstrates compliance with the applicable Areas of Competency”.

Concerning your comment about the authority of the footnote, it is the SDT’s determination, based on the Standards Committee’s guidance, that the footnote would carry the same weight as the Requirement to which it is attached. Therefore, the answer to your question “could an entity still be found non-compliant for having a non-certified trainee learning or observing?” is no, you would not be found non-compliant. However, the SDT modified the footnote to provide further clarity. The footnote now reads “Non-NERC certified personnel performing any reliability-related task of a Real-time operating position must be under the direct supervision of a NERC Certified System Operator stationed at that operating position; the NERC Certified System Operator at that operating position has ultimate

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Organization	Yes or No	Question 3 Comment
responsibility for the performance of the reliability-related tasks”.		
San Diego Gas and Electric Co.	No	<p>In R2, “Transmission Operator reliability-related tasks” need to be clearly defined and/or identified.</p> <p>Additionally, the following insertions between brackets need to be made to the text: “. . . in the areas listed &lt;in R2.1&gt; by obtaining and maintaining one of the following valid NERC certificates &lt;listed in R2.2&gt;.</p>
<p><b>Response:</b> The SDT believes that reliability-related tasks can vary from entity to entity, so the entity itself must identify the tasks that it considers to be reliability-related.</p> <p>While the SDT appreciates your suggestion, the SDT does not believe that making the modification you are suggesting would provide any additional clarity.</p>		
American Electric Power (AEP)	No	<p>AEP recommends that footnote number 1 should be removed from this standard. If it is to remain, AEP recommends that the language should be as follows: The NERC Certified System Operator has ultimate responsibility for the performance of the reliability-related tasks. If our recommendations are not accepted, then the term "operating position" needs to be formally defined or removed.</p>
<p><b>Response:</b> Your requested change could lead to the assumption that the intent of the footnote was to allow for one certification to cover more than one person performing reliability-related tasks. For example, some could assume that the Supervisor in a multi-person control center would be the only one required to hold a valid NERC certification and that the others in the room work directly under that person’s supervision. This is not what this drafting team intended. Each operator filling a Real-time position that performs reliability-related tasks must hold a NERC certificate. This is necessary to ensure that all potential threats to the Bulk Electric System that occur simultaneously at one or more desks are managed by a System Operator possessing the minimum competencies to respond to the situation reliably.</p> <p>The SDT feels making the suggested modification would reduce clarity. The SDT believes the standard clearly identifies operating position through the use of the phrase “Real-time operating positions performing (applicable entity) reliability-related tasks”. However, the SDT modified the footnote to provide further clarity. The footnote now reads “Non-NERC certified personnel performing any reliability-related task of a real-time operating position must be under the direct supervision of a NERC Certified System Operator stationed at that operating position; the NERC Certified System Operator at that operating position has ultimate responsibility for the performance of the reliability-related tasks”.</p>		
Entergy Services	No	<p>The requirements and measures both focus on the activity of achieving and maintaining certification at the appropriate certification level. The list of competencies are not needed. The exam working group determines the content of the exam, and the entity doesn't have control over that content, to ensure that the list of competencies included in the requirements are all covered in the exam to the degree needed. The list of minimum competencies should be removed from the requirements.</p>
<p><b>Response:</b> FERC Order 693 contains a directive to modify the PER-003 standard to include minimum competencies. The SDT believes that the “Areas of Competency” as used in the proposed standard represents the most efficient and effective method of meeting this FERC directive. The drafting team believes</p>		

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Organization	Yes or No	Question 3 Comment
		<p>that the NERC Certification program provides the foundation for the minimum competency that a person must possess to operate the Bulk Electric System reliably. The "Areas of Competency" identified in this standard are, by design, at a high enough level to ensure they will be included in any exam the NERC Certification Program would use both now and in the future. In addition, recertification through training would also touch upon one or more of these areas ensuring that anyone maintaining a valid NERC Certification has enhanced their ability to operate the Bulk Electric System.</p>
ERCOT ISO	No	<p>ERCOT ISO disagrees with the use of the word competency and thinks the word knowledge applies more appropriately. The current NERC certification tests knowledge and the ability to cognitively apply that knowledge to problems. As another alternative, ERCOT ISO agrees with the SRC comments to remove the word "competency" and reword the requirement as follows:"Each [operating entity] shall staff its Real-time operating positions performing [operating entity] reliability-related tasks with System Operators who have obtained and maintain one of the following valid NERC certificates:".</p>
<p><b>Response:</b> FERC Order 693 contains a directive to modify the PER-003 standard to include minimum competencies. The SDT believes that the "Areas of Competency" as used in the proposed standard represents the most efficient and effective method of meeting this FERC directive. The drafting team believes that the NERC Certification program provides the foundation for the minimum competency that a person must possess to operate the Bulk Electric System reliably. The "Areas of Competency" identified in this standard are, by design, at a high enough level to ensure they will be included in any exam the NERC Certification Program would use both now and in the future. In addition, recertification through training would also touch upon one or more of these areas ensuring that anyone maintaining a valid NERC Certification has enhanced their ability to operate the Bulk Electric System. The NERC Certification exams do test a trainee's knowledge but they also require the trainee to apply that knowledge as part of the certification exam.</p>		
Brazos Electric Power Cooperative, Inc.	No	<p>The requirements should simply state "Each [operating entity] shall staff its Real-time operating positions performing [operating entity] reliability-related tasks with System Operators who have an appropriate and valid NERC certificate". The NERC certificate program by design establishes what the minimum competency is for each certificate type.</p>
<p><b>Response:</b> FERC Order 693 contains a directive to modify the PER-003 standard to include minimum competencies. The SDT believes that the "Areas of Competency" as used in the proposed standard represents the most efficient and effective method of meeting this FERC directive. The drafting team believes that the NERC Certification program provides the foundation for the minimum competency that a person must possess to operate the Bulk Electric System reliably. The "Areas of Competency" identified in this standard are, by design, at a high enough level to ensure they will be included in any exam the NERC Certification Program would use both now and in the future. In addition, recertification through training would also touch upon one or more of these areas ensuring that anyone maintaining a valid NERC Certification has enhanced their ability to operate the Bulk Electric System.</p>		
US Bureau of Reclamation	No	<p>The definition of System Operators "An individual at a control center (Balancing Authority, Transmission Operator, Generator Operator, Reliability Coordinator) whose responsibility it is to monitor and control that electric system in real time." includes Generator Operators. The only reason the definition is not consistent with the standard and should be modified to exclude Generator Operator.</p>

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Organization	Yes or No	Question 3 Comment
<p><b>Response:</b> While the definition of the term System Operator in the NERC Glossary includes the parenthetical expression “(Balancing Authority, Transmission Operator, Generator Operator, Reliability Coordinator),” the applicability of the standard is clearly stated to be Reliability Coordinator, Balancing Authority, and Transmission Operator. There is a separate effort underway to remove the reference to “Generator Operator” from the definition of System Operator.</p>		
Covanta Energy	No	<p>The definition of “System Operator” includes “Generator Operator”, however generator operators are not covered in any specific requirement or applicability section in this standard. The term “Generator Operator” should be removed from the definition of “System Operator”, or specifically noted as "not applicable" for this standard, to remove any ambiguity in the implementation of this standard. The Generator Operator is the registered entity that is expected to meet the obligations documented in the NERC Statement of Compliance Registry Criteria (Revision 5.0) and not a person operating a generator.</p>
<p><b>Response:</b> While the definition of the term System Operator in the NERC Glossary includes the parenthetical expression “(Balancing Authority, Transmission Operator, Generator Operator, Reliability Coordinator),” the applicability of the standard is clearly stated to be Reliability Coordinator, Balancing Authority, and Transmission Operator. There is a separate effort underway to remove the reference to “Generator Operator” from the definition of System Operator.</p>		
ATC	No	<p>Although ATC appreciates the drafting team’s attempt to provide clarity we disagree with the inclusion of the list of minimum competencies (Requirement 1.1, 2.1 and 3.1). An entity may be able to demonstrate the minimum competencies requirements by showing that all System Control Operators (SCO) have a valid NERC certificate, but we have major concerns that if an auditor asked for additional evidence an entity would not be able to comply. The NERC Certification test is developed and administered by the ERO (i.e. NERC). As a Registered Entity we have no ability to ensure that the minimum competency requirements are covered by the NERC Certification Test. But since they are identified as Requirements we are required to demonstrate compliance. NERC Standard PER-005 addresses the issue of continual education using a systematic approach to training. It is ATC strong opinion that the minimum competencies requirements be deleted from the standard and that NERC demonstrates to FERC that they address these minimum competencies in the NERC Certification exam. ATC believes that this standard should only require that SCO (RC, TOP and BA) be NERC Certified.</p>
<p><b>Response:</b> Regarding your concern about sub-requirements, the SDT has modified the Measure M1.3 to provide clarification. The Measure M1.3 now reads “A copy of each of its System Operator’s NERC certificate or NERC certificate number with expiration date which demonstrates compliance with the applicable Areas of Competency”.</p> <p>FERC Order 693 contains a directive to modify the PER-003 standard to include minimum competencies. The SDT believes that the “Areas of Competency” as used in the proposed standard represents the most efficient and effective method of meeting this FERC directive. The drafting team believes that the NERC Certification program provides the foundation for the minimum competency that a person must possess to operate the Bulk Electric System reliably. The “Areas of Competency” identified in this standard are, by design, at a high enough level to ensure they will be included in any exam the NERC Certification Program would use both now and in the future. In addition, recertification through training would also touch upon one or more of these areas ensuring that anyone</p>		

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Organization	Yes or No	Question 3 Comment
<p>maintaining a valid NERC Certification has enhanced their ability to operate the Bulk Electric System.</p> <p>While the definition of the term System Operator in the NERC Glossary includes the parenthetical expression “(Balancing Authority, Transmission Operator, Generator Operator, Reliability Coordinator),” the applicability of the standard is clearly stated to be Reliability Coordinator, Balancing Authority, and Transmission Operator. There is a separate effort underway to remove the reference to “Generator Operator” from the definition of System Operator.</p>		
Portland General Electric	Yes	PGE agrees with WECC Position Paper for the Ballot of PER-003-1 - Certifying System Operators
<p><b>Response:</b> The SDT thanks you for your affirmative response and clarifying comment.</p>		
Consumers Energy	Yes	There is no need for footnote (1). Of particular concern is the phrase “at that position”. This can be taken quite literally to a qualified operator who is required to sit behind the trainee. Consumers contends the Trainee is sufficiently supervised by a NERC Certified Operator that has the responsibility for the position and is monitoring the position. There is no need for this addition.
<p><b>Response:</b> The SDT intended the footnote to clarify that each individual in training must work under the immediate direction of the System Operator who holds a valid NERC certificate, located at the Real-time operating position and responsible for performing reliability-related tasks. This is necessary to ensure that all potential threats to the Bulk Electric System that occur simultaneously at one or more operating positions are managed by an operator possessing the minimum competencies to respond to the situation reliably.</p>		
NIPSCO	Yes	Yes & no, it’s still vague who must be certified and in the SAR it was suggested that this issue be addressed as it relates to the 2006 unapproved interpretation. However, from a compliance point of view we’re not sure if this is a bad thing.
<p><b>Response:</b> The SDT thanks you for your affirmative response and clarifying comment. However, the majority of the industry supported the SDT’s position on this subject.</p>		
Northeast Power Coordinating Council	Yes	
Platte River Power Authority	Yes	
Bonneville Power Administration	Yes	
FirstEnergy	Yes	

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Organization	Yes or No	Question 3 Comment
Independent Electricity System Operator	Yes	
Northeast Utilities	Yes	
Edward c. Stein	Yes	
Exelon	Yes	
The United Illuminating Company	Yes	
Manitoba Hydro	Yes	
South Carolina Electric and Gas	Yes	
Xcel Energy	Yes	
Oncor Electric Delivery	Yes	

**4. The SDT has modified the Measure to better align with the Requirement(s). The Measure now reads “Each Reliability Coordinator, Transmission Operator and Balancing Authority shall have the following evidence to show that it staffed its Real-time operating positions performing reliability-related tasks with System Operators who have demonstrated the applicable minimum competency by obtaining and maintaining the appropriate, valid NERC certificate (R1, R2, R3):**

**M1.1 A list of Real-time operating positions.**

**M1.2 A list of System Operators assigned to its Real-time operating positions.**

**M1.3 A copy of each of its System Operator’s NERC certificate or NERC certificate number with expiration date.**

**M1.4 Work schedules, work logs, or other equivalent evidence showing which System Operators were assigned to work in Real-time operating positions.**

**Do you agree that the Measure is now better aligned with the Requirement(s)? If not, please explain in the comment area.**

**Summary Consideration:**

The majority of the commenters felt that Measure M1.1 and M1.2 were redundant to Measure M1.4 and therefore should be eliminated and that Measure M1.3 should only require the System Operator’s name and certificate number. Measures M1.1, M1.2, M1.3 and M1.4 are all necessary because entities document their work schedules differently and these measures will ensure there is sufficient evidence to prove compliance. Regarding the comment suggesting that Measure M1.3 should only require the System Operator’s name and certificate number - the present wording allows for either “a copy of each of its System Operator’s NERC Certificate” OR “NERC certificate number with expiration date”. The measure is worded this way to allow an entity being audited to determine the method that best suits its needs. The Measure, as presently worded, allows an entity to use the method as described in their comment.

A few of the commenters wanted the word “competency” to be changed to “capability”. FERC Order 693 contains a directive to modify the PER-003 standard to include minimum competencies. The “Areas of Competency” as used in the proposed standard represent the most efficient and effective method for meeting the FERC Directive.

A couple commenters felt that Measure M1.1 should be removed since System Operators performing the same reliability-related function could have different titles at different entities. The SDT agrees that different entities could have different titles for the

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same function and that is why the entity itself needs to identify those operating positions that perform Real-time reliability-related tasks.

Organization	Yes or No	Question 4 Comment
Electric Market Policy	No	<p>Dominion recommends changes to the above sentence to read as follows; M1.3 System Operators name and NERC certificate number. Dominion believes providing a 'copy' of a certificate does not represent the validity of the certificate. The "proof" is the NERC certificate test results which NERC has on file internally. SO Name and certificate number should be sufficient.</p> <p>M1.1, M1.2, are redundant to M1.4. Eliminate M1.1 and M1.2. ET recommends changes to the above sentence to include 'NERC certified'M 1.4 Work schedules, work logs, or other equivalent evidence showing which 'NERC certified' System Operators were assigned to work in Real-time operating positions.</p>
<p><b>Response:</b> M 1.3 allows for either "a copy of each of its System Operator's NERC Certificate" OR "NERC certificate number with expiration date". This was done to allow the entity being audited to determine the method that best suits its needs. As written, the entity can choose the method you suggest of maintaining a list of NERC certificate numbers and the issuance/expiration dates associated.</p> <p>The SDT believes that Measures M1.1, M1.2, M1.3 and M1.4 are necessary because entities document their work schedules differently and this ensures that evidence is sufficient to prove compliance.</p>		
SERC OC-SOS Standards Review Group	No	<p>In the Measure statement, the word "competency" should be changed to "capability" for the reasons given in our response to Question 3 above.</p> <p>For M 1.1, our group feels that maintaining a list of specific operating position titles as evidence may lead to confusion among the auditors. System operators who perform the same reliability functions will undoubtedly have different titles at different entities. These title differences could lead to unnecessary and lengthy discussions during the audit process. Our feeling is that the position title itself should not matter as long as an entity can show evidence that each operator is NERC-certified and in what specific credential.</p> <p>A good solution to streamline the measures and avoid confusion during an audit would be to fold both measures M 1.1 and M 1.2 into M 1.4. In M 1.4, add the phrase "NERC-certified" before "System Operators". The work schedules/work logs evidence required by M 1.4 will identify each operator assigned to perform Real-time reliability functions, as well as his/her Real-time operating position. M 1.1 &amp; M 1.2 evidence is redundant and these measures can be eliminated.</p> <p>For M 1.3 - Our group strongly feels that maintaining a paper or electronic copy of each operator's actual NERC certificate is unnecessary and can be problematic, since only the operator has access to his/her actual certificate. Instead, the evidence of certification for System Operators should be simply a list of the certificate</p>

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Organization	Yes or No	Question 4 Comment
		<p>numbers and the issuance/expiration dates. If an employer does not have this information and cannot obtain it from the operator, the employer does have recourse to get confirmation from NERC that an individual holds a valid NERC certificate (Ref: p.14 of System Operator Certification Program Manual, updated November 2009). We realize that M 1.3 requires as evidence EITHER a copy OR the number/expiration date for the certificate; however the implication is that, if an actual copy cannot be produced, the entity is not complying as well with the standard as those entities that CAN produce a copy. This group feels that, for consistency and fairness to all entities, the certificate copy evidence should be eliminated. Therefore, we ask the standard drafting team to please consider changing the statement for M 1.3 to: M 1.3 NERC certificate number with expiration date for each System Operator.</p>
<p><b>Response:</b> FERC Order 693 contains a directive to modify the PER-003 standard to include minimum competencies. The SDT believes that the “Areas of Competency” as used in the proposed standard represents the most efficient and effective method of meeting this FERC directive.</p> <p>The SDT agrees with you that the names of operating positions can vary from entity to entity, so the SDT believes the entity itself must identify those operating positions that perform Real-time reliability-related tasks.</p> <p>The SDT believes that Measures M1.1, M1.2, M1.3 and M1.4 are necessary because entities document their work schedules differently and this ensures that evidence is sufficient to prove compliance.</p> <p>M1.3 allows for either “a copy of each of its System Operator’s NERC Certificate” OR “NERC certificate number with expiration date”. This was done to allow the entity being audited to determine the method that best suits its needs. As written, the entity can choose the method you suggest of maintaining a list of NERC certificate numbers and the issuance/expiration dates associated.</p>		
Southern Company	No	<p>Again, in line with our comment on #3, we request that “competency” be changed to “capability”.</p> <p>M1.1 asks for a “list of Real-time operating positions”. Those titles are unique to each entity that creates them and will undoubtedly vary across industry. This inconsistency will only lead to confusion during audits as each title will have to be explained for that specific entity. The specific position title should not matter as long as the entity can provide evidence of each operator’s NERC certification and specific credentials. Therefore we suggest that M1.1 be removed from the list of measures.</p> <p>M1.2 requests a “list of System Operators assigned to its Real-time operating positions” while M1.4 requests “evidence showing which System Operators were assigned to work in Real-time operating positions.” We feel that M1.2 is inherently present in M1.4, since the evidence provided in M1.4 will identify the list of Operators requested in M1.2, and therefore the two measures should be combined.</p> <p>To further clarify the term “NERC Certified” should precede the term “System Operators” in the new combined measure. M1.3 asks for “a copy of each of its System Operator’s NERC Certificate” OR “NERC certificate number with expiration date.” We feel that attempting to maintain a copy of each operator’s certificate could be problematic since only the operator has access to the actual certificate. A simpler solution would be to just</p>

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Organization	Yes or No	Question 4 Comment
		<p>maintain a list of NERC certificate numbers and the issuance/expiration dates associated. In the event this information is not readily available from the operator, the employer then has recourse to get confirmation from NERC that an individual in fact holds a valid NERC certificate. (Ref: p.14 of the System Operator Certification Program Manual, updated Nov. 2009) While the current draft is phrased as one or the other, we feel that appearances could be created that an entity is not fully complying with the measure if the copy cannot be produced. Therefore we request that the first part of the statement referencing copies of the certificate be removed and just the list of certificate numbers be used for measure. The revised M1.3 would read "NERC certificate number with issuance &amp; expiration date for each System Operator."</p>
<p><b>Response:</b> FERC Order 693 contains a directive to modify the PER-003 standard to include minimum competencies. The SDT believes that the "Areas of Competency" as used in the proposed standard represents the most efficient and effective method of meeting this FERC directive.</p> <p>The SDT agrees with you that the names of operating positions can vary from entity to entity, so the SDT believes the entity itself must identify those operating positions that perform Real-time reliability-related tasks.</p> <p>The SDT believes that Measures M1.1, M1.2, M1.3 and M1.4 are necessary because entities document their work schedules differently and this ensures that evidence is sufficient to prove compliance.</p> <p>M1.3 allows for either "a copy of each of its System Operator's NERC Certificate" OR "NERC certificate number with expiration date". This was done to allow the entity being audited to determine the method that best suits its needs. As written, the entity can choose the method you suggest of maintaining a list of NERC certificate numbers and the issuance/expiration dates associated.</p>		
NIPSCO	No	<p>No, "reliability related tasks" should be included in the measurements M1.1 &amp; M1.2 since only the system operators performing such tasks need to be certified.</p>
<p><b>Response:</b> The SDT believes that your suggested modification is already included in the Measure M1 and therefore does not need to be repeated in the sub-measures.</p>		
Duke Energy	No	<p>We believe M1.1 creates potential for confusion and should be deleted. It is not part of any of the requirements. M1.2, M1.3 and M1.4 are sufficient.</p>
<p><b>Response:</b> The SDT believes that Measures M1.1, M1.2, M1.3 and M1.4 are necessary because entities document their work schedules differently and this ensures that evidence is sufficient to prove compliance. The names of operating positions can vary from entity to entity; the entity must identify those operating positions that perform Real-time reliability-related tasks under M1.1 so that an auditor can determine whether "Real-time operating positions" were properly staffed.</p>		

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Organization	Yes or No	Question 4 Comment
San Diego Gas and Electric Co.	No	How about emergency exceptions? The previous version of this standard, PER-003-0, allows for emergency exceptions in M1.2.
<p><b>Response:</b> The drafting team believes that the transition to the backup control center is covered by EOP-008-0 Requirement R1.8 and in EOP-008-1 Requirements R1, R3 and R4.</p>		
Entergy Services	No	M1.3 - It should not be necessary to provide a copy of the NERC certificate. A list of operators and certificate numbers and dates should be sufficient. NERC should be able to verify if the names and numbers are correct and current. I recommend that only the certificate number be required in M1.3
<p><b>Response:</b> M1.3 allows for either “a copy of each of its System Operator’s NERC Certificate” OR “NERC certificate number with expiration date”. This was done to allow the entity being audited to determine the method that best suits its needs. As written, the entity can choose the method you suggest of maintaining a list of NERC certificate numbers and the issuance/expiration dates associated.</p>		
ERCOT ISO	No	As explained in its response to Question 3, ERCOT ISO disagrees with the use of the word “competency” and thinks the word “knowledge” applies more appropriately. ERCOT ISO agrees with the wording of the measures, as they apply to all the requirements.
<p><b>Response:</b> FERC Order 693 contains a directive to modify the PER-003 standard to include minimum competencies. The SDT believes that the “Areas of Competency” as used in the proposed standard represents the most efficient and effective method of meeting this FERC directive.</p>		
Brazos Electric Power Cooperative, Inc.	No	Simplify by striking "demonstrated the applicable minimum competency by obtaining and maintaining" from the Measure.
<p><b>Response:</b> The SDT believes that the phrase is needed in the measure to provide clarity to the industry. In addition, the SDT feels that this language directly supports the language used in the Requirement.</p>		
ATC	No	<p>Clarity should be provided in M1.1. Is this a list of positions that could perform real-time operating positions or a job description?</p> <p>In addition changing the statement to read “Each Reliability Coordinator, Transmission Operator and Balancing Authority may use the following evidence...” will indicate that the entity may use other evidence to demonstrate compliance and that these are only examples. The measures should not be prescriptive or limiting</p>
<p><b>Response:</b> The Measure M1.1 clearly states “A list of Real-time operating positions”. If a job description provides enough information to provide an auditor with</p>		

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Organization	Yes or No	Question 4 Comment
<p>the information needed to show which Real-time operating positions need to have certified individuals performing the duties of that position, then you could use a job description.</p>		
<p>The SDT believes that the present wording of the Measure provides for the most consistent, efficient and effective way for an entity to show compliance.</p>		
Portland General Electric	Yes	PGE agrees with WECC Position Paper for the Ballot of PER-003-1 - Certifying System Operators
<p><b>Response:</b> The SDT thanks you for your affirmative response and clarifying comment.</p>		
The United Illuminating Company	Yes	For clarity, consider modifying M1 to include the phrase performing reliability-related tasks, e.g A list of Real-time operating positions performing reliability-related tasks.
<p><b>Response:</b> The SDT thanks you for your affirmative response and clarifying comment. The SDT believes that your suggested modification is already included in the Measure M1 and therefore does not need to be repeated in the sub-measures.</p>		
Northeast Power Coordinating Council	Yes	
Platte River Power Authority	Yes	
Bonneville Power Administration	Yes	
FirstEnergy	Yes	
MRO's NERC Standards Review Subcommittee	Yes	
Midwest ISO Standards Collaborators	Yes	
NextEra Energy	Yes	
Independent Electricity System Operator	Yes	
Northeast Utilities	Yes	

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Organization	Yes or No	Question 4 Comment
Consumers Energy	Yes	
Edward c. Stein	Yes	
Exelon	Yes	
Manitoba Hydro	Yes	
South Carolina Electric and Gas	Yes	
Xcel Energy	Yes	
American Electric Power (AEP)	Yes	
FRCC Manager of Operations	Yes	
US Bureau of Reclamation	Yes	
Covanta Energy	Yes	
Oncor Electric Delivery	Yes	

**5. Please provide any other comments (that you have not already provided in response to the questions above) that you have on the draft standard PER-003-1.**

**Summary Consideration:** A few of the commenters felt the ERO should be required to create and maintain a certification program that meets the minimum competencies identified within the standard and remove the competencies from the standard. T NERC, the ERO, currently provides the System Operator Certification Program on which this standard is based. T The System Operator Certification program, by design, is autonomous and t already included in the NERC Rules of Procedure. The SDT believes that placing a requirement in this standard for the ERO to provide this System Operator Certification Program would compromise the autonomy of this program and weaken the program.

One commenter stated that the SAR suggested that “grandfathering” be addressed but did not see it in this proposed standard. The SDT considered grandfathering at length during the initial standard drafting phase. The SDT determined, and the industry supported the SDT’s position, that grandfathering is not appropriate for this standard.

Another commenter felt that since the previous version of this standard, PER-003-0, specified variations in the Levels of Non-Compliance, this version of the standard should contain variations in the VSLs. The SDT e believes the Requirements are binary in that the System Operator either holds the appropriate, valid certificate or does not. The SDT believes that the Real-time operation of the power system is dynamic and the intent of this requirement is to ensure that there is a System Operator with at least a minimum set of competencies sitting in each RC, TOP, and BA control room at all times.

Some commenters restated their concerns with the inclusion of minimum competencies, the clarity of the footnote, the formatting used in the Requirements and the use of the term “System Operators”. The SDT restated its response to these concerns.

Organization	Yes or No	Question 5 Comment
MRO's NERC Standards Review Subcommittee		<p>The NSRS recommends that the requirements regarding the “minimum competencies” are misapplied to the functional entities. As stated in R1, R2, and R3 a System operator has to demonstrate minimum competencies that are obtained by a valid NERC Reliability Operator certificate. Applicable entities have no ability to know if these “areas of Competency” are adequately addressed within the NERC Certification Program (the test) or not. If the SDT believes that System Operators require a valid NERC Certificate to operate a Real-time position responsible for control of the BES, it should be simply stated.</p> <p>If not these Areas of Competency should apply to the ERO. The ERO should be required to create and maintain a certification program that meets the minimum competencies identified within the standard. Then the functional entities should simply be required to staff their System Operator positions with staff that has</p>

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Organization	Yes or No	Question 5 Comment
		<p>been become certified and maintained that certification through NERC. While some argue that standards cannot apply to the ERO, we would point out that the results-based standards approach approved by the NERC BOT does appear to allow requirements on the ERO. As an example, the recently posted Project 2009-01 Impact Event and Disturbance Assessment, Analysis, and Reporting includes many requirements on the ERO and is following the result-based approach.</p>
		<p><b>Response:</b> FERC Order 693 contains a directive to modify the PER-003 standard to include minimum competencies. The SDT believes that the “Areas of Competency” as used in the proposed standard represents the most efficient and effective method of meeting this FERC directive.</p> <p>The drafting team believes that the NERC Certification program provides the foundation for the minimum competency that a person must possess to operate the Bulk Electric System reliably. The “Areas of Competency” identified in this standard are, by design, at a high enough level to ensure they will be included in any exam the NERC Certification Program would use both now and in the future. In addition, recertification through training would also touch upon one or more of these areas ensuring that anyone maintaining a valid NERC Certification has enhanced their ability to operate the Bulk Electric System.</p> <p>NERC, the ERO, currently provides the System Operator Certification program on which this standard is based. This program, by design, is autonomous. This program is already included in the NERC Rules of Procedure. Placing a requirement in a standard for the ERO to provide this System Operator Certification program compromises the autonomy of this program and weakens it.</p>
Midwest ISO Standards Collaborators		<p>The requirements regarding the minimum competencies are misapplied to the functional entities. They should apply to the ERO. The ERO should be required to create and maintain a certification program that meets the minimum competencies identified within the standard. Then the functional entities should simply be required to staff their System Operator positions with staff that has become certified and maintained that certification through NERC. While some argue that standards cannot apply to the ERO, we would point out that the results-based standards approach approved by the NERC BOT does appear to allow requirements on the ERO. As an example, the recently posted Project 2009-01 Impact Event and Disturbance Assessment, Analysis, and Reporting includes many requirements on the ERO and is following the results-based approach.</p>
		<p><b>Response:</b> NERC, the ERO, currently provides the System Operator Certification program on which this standard is based. This program by design, is autonomous. This program is already included in the NERC Rules of Procedure. Placing a requirement in a standard for the ERO to provide this System Operator Certification program compromises the autonomy of this program and weakens it. The “Areas of Competency” identified in this standard are, by design, at a high enough level to ensure they will be included in any exam the NERC Certification Program would use both now and in the future. In addition, recertification through training would also touch upon one or more of these areas ensuring that anyone maintaining a valid NERC Certification has enhanced their ability to operate the Bulk Electric System.</p>
SERC OC-SOS Standards Review Group		<p>To better identify the operators to whom this standard applies, please consider changing the title of the standard to “Real-time Operating Personnel Credentials”</p>

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Organization	Yes or No	Question 5 Comment
		<p>To be consistent with other reliability standards, please consider adjusting the numbering of the measures to be the same as the numbering of the requirements.</p> <p>The standard drafting team is to be commended for their thoughtful consideration of comments from the last review cycle, and their response to every concern from the industry."The comments expressed herein represent a consensus of the views of the above named members of the SERC OC-SOS Standards Review Group only and should not be construed as the position of SERC Reliability Corporation, its board or its officers."</p>
<p><b>Response:</b> The SDT was given the title of the standard through the SAR process. The SDT believes that the title is appropriate with the content of the standard. The SDT believes that all three Requirements use the same method to demonstrate compliance and therefore did not feel it was necessary to repeat the Measure three times. If your comment concerns the formatting used in this standard, the formatting used in this draft standard is consistent with the guidance provided by NERC staff.</p> <p>The SDT thanks you for your compliment.</p>		
Electric Market Policy		<p>Consider changing title of Standard to include "Real Time" Operating Personnel Credentials Standard. This would eliminate the potential ambiguity or perception requiring Transmission Planners and other support staff to be NERC certified.</p>
<p><b>Response:</b> The SDT was given the title of the standard through the SAR process. The SDT believes that the title is appropriate with the content of the standard.</p>		
Southern Company		<p>For consistency and to better identify the application of the standard, we suggest changing the title to "Real-time Operating Personnel Credentials"</p> <p>Also for consistency with other standards, we suggest changing the measure numbering to directly reflect the corresponding requirement numbering.</p>
<p><b>Response:</b> The SDT was given the title of the standard through the SAR process. The SDT believes that the title is appropriate with the content of the standard. The SDT believes that all three Requirements use the same method to demonstrate compliance and therefore did not feel it was necessary to repeat the Measure three times. If your comment concerns the formatting used in this standard, the formatting used in this draft standard is consistent with the guidance provided by NERC staff.</p>		
ATC		<p>ATC recommends that the footnote be changed to read "Personnel learning or observing the tasks of an operating position must be under the direct supervision of a NERC Certified System Operator at that operating position who has the sole responsibility for the performance of the reliability-related task." Delete the words "non-NERC certified".ATC is concerned that the qualifying term "non-NERC Certified" is too</p>

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Organization	Yes or No	Question 5 Comment
		<p>prescriptive in identifying who qualifies as a trainee. Entities may have a trainee that is NERC Certified but has not been cleared to work the desk. The qualifying term (non-NERC Certified) would make it unnecessarily difficult for entities to identify those individuals as a trainee.</p>
<p><b>Response:</b> Your requested change could lead to the assumption that the intent of the footnote was only to allow for trainees. The SDT does not believe that the present wording limits the trainee to non-certified personnel. The footnote is designed to limit the tasks that a non-NERC certified individual can independently perform. However, the SDT modified the footnote to provide further clarity. The footnote now reads “Non-NERC certified personnel performing any reliability-related task of a real-time operating position must be under the direct supervision of a NERC Certified System Operator stationed at that operating position; the NERC Certified System Operator at that operating position has ultimate responsibility for the performance of the reliability-related tasks”.</p> <p>The SDT believes that in addition to achieving NERC certification, it is the entity's responsibility to determine when an individual (trainee) is qualified to fill a Real-time operating position.</p>		
Edward c. Stein		<p>The changes try to clarify the motherhood and apple pie statements. the real test will be how the Compliance people interpret and measure the standard</p>
<p><b>Response:</b> The SDT thanks you for your clarifying comment.</p>		
NIPSCO		<p>In the context of NERC Reliability Standards we believe that Generator Operator should be removed from the System Operator definition. Throughout the standards and the SOCCED we think that System Operator includes only BA, RC &amp; TOP.</p> <p>Also, it was suggested in the SAR that “grandfathering” be addressed and we don’t see that.</p>
<p><b>Response:</b> While the definition of the term System Operator in the NERC Glossary includes the parenthetical expression “(Balancing Authority, Transmission Operator, Generator Operator, Reliability Coordinator),” the applicability of the standard is clearly stated to be Reliability Coordinator, Balancing Authority, and Transmission Operator. There is another effort underway to modify the definition of “System Operator” to remove the reference to “Generator Operator.”</p> <p>The SDT considered grandfathering at length during the initial standard drafting phase. The SDT determined and the industry supported the SDT’s position that grandfathering was not appropriate for this standard.</p>		
San Diego Gas and Electric Co.		<p>Section D, #2 (Violation Severity Levels) -- there has to be some variations to VSLs. Currently, only Severe VSLs are defined. The previous version of this standard, PER-003-0, specified variations in the Levels of Non-Compliance.</p>
<p><b>Response:</b> The SDT feels that the Requirement is binary in that the System Operator either holds the appropriate, valid certificate or does not. The SDT believes that the Real-time operation of the power system is dynamic and the intent of this requirement is to ensure that there is a System Operator with a minimum set</p>		

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Organization	Yes or No	Question 5 Comment
of competencies sitting in each RC, TOP, and BA control room at all times.		
Xcel Energy		We continue to assert that listing the competencies here is ineffective. This standard should only list the certificates required for each function (e.g. BA, TOP, RC). The competencies should be outlined in the governing documents for the certification development. Entities have no control over what is contained within the exams to obtain those certificates, thus it is pointless to even list those competencies in the standard unless they are applicable to the entity and they can do something to affect compliance with those competencies listed. To address concerns about competencies, we also believe that PER-005 spells out that operators have requirements to identify reliability tasks and have demonstrated competency to those tasks.
<p><b>Response:</b> FERC Order 693 contains a directive to modify the PER-003 standard to include minimum competencies. The SDT believes that the “Areas of Competency” as used in the proposed standard represents the most efficient and effective method of meeting this FERC directive.</p> <p>The drafting team believes that the NERC Certification program provides the foundation for the minimum competency that a person must possess to operate the Bulk Electric System reliably. The “Areas of Competency” identified in this standard are, by design, at a high enough level to ensure they will be included in any exam the NERC Certification Program would use both now and in the future. In addition, recertification through training would also touch upon one or more of these areas ensuring that anyone maintaining a valid NERC Certification has enhanced their ability to operate the Bulk Electric System.</p>		
FRCC Manager of Operations		Please see presponse to question 3. Thanks for the opportunity to comment.
<p><b>Response:</b> The SDT appreciates your comment. However, the formatting used in this draft standard is consistent with the guidance provided by NERC staff.</p>		
FirstEnergy		FE supports the changes and thanks the drafting team for their hard work on this project.
<p><b>Response:</b> The SDT thanks you for your clarifying comment.</p>		
BGE		We support the clarification of PER-003 in this new revision. We also support the use of the NERC System Operator Certification Program as a manner in which to ensure that System Operators can demonstrate competency in the reliability-related tasks of their position.
<p><b>Response:</b> The SDT thanks you for your clarifying comment.</p>		
ERCOT ISO		As explained in its response to Question 3, ERCOT ISO disagrees with the use of the word “competency” and thinks the word “knowledge” applies more appropriately. These requirements are part of the System Operator Certification and are assessed by the Personnel Certification Governance Committee (PCGC).
<p><b>Response:</b> FERC Order 693 contains a directive to modify the PER-003 standard to include minimum competencies. The SDT believes that the “Areas of</p>		

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Organization	Yes or No	Question 5 Comment
		<p>Competency” as used in the proposed standard represents the most efficient and effective method of meeting this FERC directive. The drafting team believes that the NERC Certification program provides the foundation for the minimum competency that a person must possess to operate the Bulk Electric System reliably. The “Areas of Competency” identified in this standard are, by design, at a high enough level to ensure they will be included in any exam the NERC Certification Program would use both now and in the future. In addition, recertification through training would also touch upon one or more of these areas ensuring that anyone maintaining a valid NERC Certification has enhanced their ability to operate the Bulk Electric System.</p>
NextEra Energy		See question 3.
<p><b>Response:</b> The SDT appreciates your comment. However, the formatting used in this draft standard is consistent with the guidance provided by NERC staff.</p>		
Consumers Energy		Please see comment #3.
<p><b>Response:</b> The SDT intended the footnote to clarify that each individual in training must work under the immediate direction of the System Operator who holds a valid NERC certificate, located at the Real-time operating position and responsible for performing reliability-related tasks. This is necessary to ensure that all potential threats to the Bulk Electric System that occur simultaneously at one or more operating positions are managed by an operator possessing the minimum competencies to respond to the situation reliably.</p>		