



On June 17, 2010, FERC issued a Notice of Proposed Rulemaking (“NOPR”) on proposed Reliability Standards PER-005-1 and PER-004-2 in which it sought comments from NERC and other interested persons on whether completion of the expansion of the training standard in Project 2010-01 – Support Personnel Training by the fourth quarter of 2011 is reasonable, or whether, for good cause, another timeline for completion of this work would be necessary.<sup>4</sup> NERC submitted comments in response to the NOPR<sup>5</sup> on August 23, 2010, in which NERC proposed to “resolve the directive to consider whether Generator Operators and personnel who support EMS applications should be included in a mandatory training standard within twenty-four (24) months from the date of this filing.”<sup>6</sup>

On November 18, 2010, FERC issued Order No. 742 in which the Commission approved PER-005-1 and PER-004-2 and accepted NERC’s proposal to satisfy the directive by August 23, 2012.<sup>7</sup> Order No. 742 provided, “...With respect to the Order No. 693 directive to consider whether personnel that support EMS applications should be included in the training Reliability Standard, we accept NERC’s commitment to satisfy this directive by August 23, 2012.”<sup>8</sup>

## **II. MOTION FOR EXTENSION**

By this motion, NERC is requesting an extension of time to address the directive in Order No. 742, in accordance with NERC’s Reliability Standards Development Plan 2012-2014.<sup>9</sup> As set forth in NERC’s April 5, 2011 Informational Filing (“April 5 Informational Filing”),<sup>10</sup> NERC

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<sup>4</sup> *System Personnel Training Reliability Standards*, 131 FERC ¶ 61,254 (June 17, 2010) (“NOPR”).

<sup>5</sup> Comments of the North American Electric Reliability Corporation in Response to Notice of Proposed Rulemaking, Docket No. RM09-25-000 (August 23, 2010) (“Comments”).

<sup>6</sup> Comments, p. 21.

<sup>7</sup> *System Personnel Training Reliability Standards*, 133 FERC ¶ 61,159 (2010) (“Order No. 742”).

<sup>8</sup> Order No. 742 at P 86.

<sup>9</sup> NERC’s Board of Trustees approved the Reliability Standards Development Plan 2012-2014 on November 3, 2011.

<sup>10</sup> *North American Electric Reliability Corporation Reliability Standards Development Plan 2011-2013 Informational Filing Pursuant to Section 310 of the NERC Rules of Procedure*, Docket Nos. RM05-17-000, RM05-25-000, RM06-16-000, (April 5, 2011).

adopted a prioritization tool to assist in determining the relative priorities of projects within the NERC Standards Development portfolio. During the prioritization effort, the project to consider whether personnel that support EMS applications should be included in the training Reliability Standard was not determined to be the highest priority on the tool's resultant priority list in either the 2011-2013 Reliability Standards Development Plan or the 2012-2014 Reliability Standards Development Plan. Therefore, NERC has postponed the start of this project in order to focus industry resources on projects that have higher overall reliability impact. As NERC stated in the April 5 Informational Filing:

This tool consider[s] various factors, including regulatory actions, overall reliability impact, stakeholder and staff experience, and project logistics. Assisted by that prioritization tool, the [NERC] Standards Committee identified a set of projects to which the majority of NERC and industry resources are being assigned. Projects already in progress that are not within this set are being moved into an “informal development” phase, where the industry may continue to perform research and analysis expected to aid in future standards development. Additionally, several projects that have not yet started have had their initiation postponed.<sup>11</sup>

Based on the results of NERC's 2012-2014 prioritization effort and associated work plan development, the proposed Project 2010-01— Support Personnel Training is expected to be initiated in the fourth quarter of 2012, pending further research in early 2012 to properly define the scope of the project. This expectation relies on an assumption that current standards development project forecasts are correct, and that priorities will not change before commencement of this project. Under NERC's current processes, NERC's Standards Committee considers the regulatory, reliability, and logistical issues associated with projects to create or modify NERC standards, then determines the manner in which industry resources and NERC staff are deployed to create or modify those standards. Changes in resources, priorities, or other factors may result in an earlier or later expected date of initiation. Additionally, all new and

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<sup>11</sup> April 5 Informational Filing at p. 2.

modified standards must be developed following the steps outlined in the current NERC Standard Processes Manual, which ensures an open and inclusive stakeholder process through adherence to ANSI standards development principles. Accordingly, NERC's development of consensus support may also affect the initiation date.

Given the above, NERC currently forecasts that the standard or standards associated with this project will be completed and filed by the end of the third quarter of 2014. However, as the April 5 Informational Filing anticipated, future prioritizations may vary, and "new priorities may be created as our experience grows, as new risks are identified, that will create an ongoing need to be flexible in work planning to ensure the activities most in the interest of bulk power system reliability are given appropriate resources and priority."<sup>12</sup> NERC will continue to provide status updates to the Commission through the annual filings of the *Reliability Standards Development Plan* regarding the estimated start and completion dates of this project.

NERC has agreed in the past and continues to agree that proper training of support personnel is an issue that needs to be addressed. However, there are limits to how many projects may be undertaken at any one time by NERC staff and the industry volunteers that NERC relies upon to bring these projects to a successful outcome.

### **III. CONCLUSION**

WHEREFORE, in consideration of the foregoing, NERC respectfully requests that an extension of time be granted until the end of the third quarter of 2014 to complete the project to consider whether personnel that support EMS applications should be included in the training Reliability Standard, consistent with the Reliability Standards Development Plan 2012-2014 and the associated results of the NERC prioritization tool.

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<sup>12</sup> *Id.*

Respectfully submitted,

/s/ Andrew M. Dressel

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**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing document upon all parties listed on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, D.C. this 22nd day of November, 2011.

*/s/ Andrew M. Dressel*

Andrew M. Dressel

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Reliability Corporation*