

Consideration of Comments

Project Name: 2017-02 Modifications to Personnel Performance, Training, and Qualification Standards

Comment Period Start Date: 6/21/2017

Comment Period End Date: 7/24/2017

There were 29 sets of responses, including comments from approximately 115 different people from approximately 85 companies representing all 10 of the Industry Segments as shown in the table on the following pages.

All comments submitted can be reviewed in their original format on the [project page](#).

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 Director of Standards Development, [Steve Noess](#) (via email) or at (404) 446-9691.

Questions

1. The PRT is recommending that a clarifying footnote be added to all of the requirements in PER-003-1. The PRT is suggesting that the footnote state the following: “The certifications referenced under the standard are those under the NERC System Operator Certification Program.” Do you agree that this footnote would provide the necessary clarity? If not, please explain in the comment area below.
2. The PRT suggests that PER-004-2 be retired based on the identified duplicate requirements. Do you agree that his standard should be retired? If not, please explain in the comment area below.
3. Do you know of any additional requirements that the PRT has not identified to justify the retirement of PER-004-2? If yes, please identify the standard and requirement in the comment area below.

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

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
ACES Power Marketing	Brian Van Gheem	6	NA - Not Applicable	ACES Standards Collaborators	Greg Froehling	Rayburn Country Electric Cooperative, Inc.	3	SPP RE
					Bob Solomon	Hoosier Energy Rural Electric Cooperative, Inc.	1	RF
					Karl Kohlrus	Prairie Power, Inc.	1,3	SERC
					Steve McElhaney	Cooperative Energy	4,6	SERC
					Bill Hutchison	Southern Illinois Power Cooperative	1	SERC
					Amber Skillern	East Kentucky Power Cooperative	1,3	SERC
					Tara Lightner	Sunflower Electric Power Corporation	1	SPP RE

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Shari Heino	Brazos Electric Power Cooperative, Inc.	1,5	Texas RE
					John Shaver	"Arizona Electric Power Cooperative, Inc. "	1	WECC
Duke Energy	Colby Bellville	1,3,5,6	FRCC,RF,SERC	Duke Energy	Doug Hils	Duke Energy	1	RF
					Lee Schuster	Duke Energy	3	FRCC
					Dale Goodwine	Duke Energy	5	SERC
					Greg Cecil	Duke Energy	6	RF
Midwest Reliability Organization	Dana Klem	1,2,3,4,5,6	MRO	MRO NSRF	Joseph DePoorter	Madison Gas & Electric	3,4,5,6	MRO
					Larry Heckert	Alliant Energy	4	MRO
					Amy Casucelli	Xcel Energy	1,3,5,6	MRO
					Michael Brytowski	Great River Energy	1,3,5,6	MRO
					Jodi Jensen	Western Area Power Administration	1,6	MRO

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Kayleigh Wilkerson	Lincoln Electric System	1,3,5,6	MRO
					Mahmood Safi	Omaha Public Power District	1,3,5,6	MRO
					Brad Parret	Minnesota Powert	1,5	MRO
					Terry Harbour	MidAmerican Energy Company	1,3	MRO
					Tom Breene	Wisconsin Public Service Corporation	3,5,6	MRO
					Jeremy Voll	Basin Electric Power Cooperative	1	MRO
					Kevin Lyons	Central Iowa Power Cooperative	1	MRO
					Mike Morrow	Midcontinent ISO	2	MRO
Seattle City Light	Ginette Lacasse	1,3,4,5,6	WECC		Pawel Krupa	Seattle City Light	1	WECC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
				Seattle City Light Ballot Body	Hao Li	Seattle City Light	4	WECC
					Bud (Charles) Freeman	Seattle City Light	6	WECC
					Mike Haynes	Seattle City Light	5	WECC
					Michael Watkins	Seattle City Light	1,4	WECC
					Faz Kasraie	Seattle City Light	5	WECC
					John Clark	Seattle City Light	6	WECC
					Tuan Tran	Seattle City Light	3	WECC
					Laurrie Hammack	Seattle City Light	3	WECC
DTE Energy - Detroit Edison Company	Karie Barczak	3,4,5		DTE Energy - DTE Electric	Jeffrey Depriest	DTE Energy - DTE Electric	5	RF
					Daniel Herring	DTE Energy - DTE Electric	4	RF
					Karie Barczak	DTE Energy - DTE Electric	3	RF

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
Southern Company - Southern Company Services, Inc.	Marsha Morgan	1,3,5,6	SERC	Southern Company	Katherine Prewitt	Southern Company Services, Inc	1	SERC
					Jennifer Sykes	Southern Company Generation and Energy Marketing	6	SERC
					R Scott Moore	Alabama Power Company	3	SERC
					William Shultz	Southern Company Generation	5	SERC
California ISO	Richard Vine	2		ISO/RTO Council Standards Review Committee	Ali Miremadi	California ISO	2	WECC
					Greg Campoli	NYISO	2	NPCC
					Kathleen Goodman	ISONE	2	NPCC
					Nathan Bigbee	ERCOT	2	Texas RE
					Terry Bilke	MISO	2	MRO
					Ben Li	IESO	2	NPCC
					Al DiCaprio	PJM	2	RF
					Charles Yeung	SPP	2	SPP RE

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	RSC	Paul Malozewski	Hydro One.	1	NPCC
					Guy Zito	Northeast Power Coordinating Council	NA - Not Applicable	NPCC
					Randy MacDonald	New Brunswick Power	2	NPCC
					Wayne Sipperly	New York Power Authority	4	NPCC
					Glen Smith	Entergy Services	4	NPCC
					Brian Robinson	Utility Services	5	NPCC
					Bruce Metruck	New York Power Authority	6	NPCC
					Alan Adamson	New York State Reliability Council	7	NPCC
					Edward Bedder	Orange & Rockland Utilities	1	NPCC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					David Burke	Orange & Rockland Utilities	3	NPCC
					Michele Tondalo	UI	1	NPCC
					Sylvain Clermont	Hydro Quebec	1	NPCC
					Si Truc Phan	Hydro Quebec	2	NPCC
					Helen Lainis	IESO	2	NPCC
					Laura Mcleod	NB Power	1	NPCC
					Michael Forte	Con Edison	1	NPCC
					Kelly Silver	Con Edison	3	NPCC
					Peter Yost	Con Edison	4	NPCC
					Brian O'Boyle	Con Edison	5	NPCC
					Michael Schiavone	National Grid	1	NPCC
					Michael Jones	National Grid	3	NPCC
					David Ramkalawan	Ontario Power Generation Inc.	5	NPCC
					Quintin Lee	Eversource Energy	1	NPCC
					Kathleen Goodman	ISO-NE	2	NPCC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Greg Campoli	NYISO	2	NPCC
					Silvia Mitchell	NextEra Energy - Florida Power and Light Co.	6	NPCC
					Sean Bodkin	Dominion - Dominion Resources, Inc.	6	NPCC
Southwest Power Pool, Inc. (RTO)	Shannon Mickens	2	SPP RE	SPP Standards Review Group	Shannon Mickens	Southwest Power Pool Inc.	2	SPP RE
					Lonnie Lindekugel	Southwest Power Pool Inc.	2	SPP RE
					James Nail	City of Independence Power and Light	3	SPP RE
					John Allen	City Utilities of Springfield, Missouri	4	SPP RE
					Kevin Giles	Westar Energy	1	SPP RE

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Michelle Corley	Cleco Corporation	3	SPP RE
					Mike Kidwell	Empire District Electric Company	1,3,5	SPP RE
					Robert Gray	Board of Public Utilities (Kansas City,KS-BPU)	NA - Not Applicable	SPP RE
					Brian Wood	Southwest Power Pool Inc.	2	SPP RE

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

Thomas Foltz - AEP - 3,5

Answer No

Document Name

Comment

As stated in our previous comments related to Project 2016-EPR-01, AEP believes the standard as currently written is sufficiently clear in this regard. The current version of the standard states that its purpose is “to ensure that System Operators performing the reliability-related tasks of the Reliability Coordinator, Balancing Authority and Transmission Operator are certified through the NERC System Operator Certification Program when filling a Real-time operating position responsible for control of the Bulk Electric System.” This, coupled with the references to “NERC Reliability Operator certificate” within the requirements themselves, provides a clear and direct correlation to the certification specified within the NERC System Operator Certification Program Manual. As a result, we see no lack of clarity within the standard. While AEP does not entirely object to the concept of explicitly referencing the SOC Program Manual in the requirements of PER-003-1, extreme care should be taken to ensure that additional obligations aren’t unintentionally implied by generally referring to the entire manual as a whole.

Likes 0

Dislikes 0

Response

Industry response and feedback received from this posting and the PRT recommendation posting reaffirms the recommendation to add a footnote to provide clarity as to the connection between the Standard and the NERC System Operator Certification Program Manual.

The intent of the SAR DT is not to expand the standard to reflect anything more than the certifications referenced in the NERC System Operator Certification Program Manual not the manual in its entirety.

Michael Cruz-Montes - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE

Answer No

Document Name

Comment

CenterPoint Energy does not believe any clarification is needed. The Purpose states, "To ensure that System Operators performing the reliability-related tasks of the Reliability Coordinator, Balancing Authority and Transmission Operator are certified through the NERC System Operator Certification Program when filling a Real-time operating position responsible for control of the Bulk Electric System." No revisions are warranted.

Likes 0

Dislikes 0

Response

Industry response and feedback received from this posting and the PRT recommendation posting reaffirms the recommendation to add a footnote to provide clarity as to the connection between the Standard and the NERC System Operator Certification Program Manual.

Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable, Group Name ACES Standards Collaborators

Answer No

Document Name

Comment

1. The language listed within this question does not currently align with what is listed within the SAR. We want to confirm that the language proposed does not identify a specific standard revision (i.e. PER-003-1). Furthermore, we propose the footnote references the NERC Personnel Certification Program, as identified within the NERC Rules of Procedure. We propose using this language instead for the footnote, "The NERC certificates referenced in this standard pertain to those identified under the NERC Personnel Certification Program (i.e. NERC System Operator Certification Program)."

2. We feel the SDT has misunderstood our previous comments regarding the Enhanced Periodic Review of the PER Reliability Standards. The scope of PER-003 is to require registered entities to staff Real-time operating positions with NERC-certified System Operators performing reliability-related tasks. Personnel are certified through an examination process that is dictated by the NERC System Operator Certification Program and governed by the NERC Personnel Certification Governance Committee (PCGC). However, with recent changes to the exam, as identified on the NERC web site (<http://www.nerc.com/pa/Train/SysOpCert/Pages/default.aspx>), we no longer see a one-to-one set of minimum competencies necessary for eligible candidates to possess in order to take the NERC System Operator Certification exam. This places a compliance burden on applicable entities to demonstrate a reasonable assurance that their NERC-certified System Operators have obtained the necessary competencies, as identified within the PER-003-1 standard. We feel this “chicken-and-egg” problem could be entirely avoided by removing the minimum set of competencies from the standard and only requiring applicable entities to staff Real-time operating positions with NERC-certified System Operators performing reliability-related tasks. This would also provide the NERC PCGC more control over the NERC System Operator Certification Program and not conflict with examination and continuing education requirements posted on the NERC web site.
3. We thank you for this opportunity to provide these comments.

Likes 0

Dislikes 0

Response

1. Thank you for your comment. The language referenced is suggested language provided by the SAR DT. The actual language will be developed by the standard drafting team during the next phase of this project.
2. The SAR DT does not know of any violations of this standard that necessitates the modifications you suggested related to competencies associated with perceived compliance burden. FERC Order 693 paragraph 1396 directed the ERO to include minimum competencies in this standard. Therefore, the scope of the standard is the minimum competencies required to operate the BES as a NERC Certified System Operator (NCSO).

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

Answer

Yes

Document Name

Comment

No comment.

Likes 0

Dislikes 0

Response

Daniel Grinkevich - Con Ed - Consolidated Edison Co. of New York - 1,3,5,6

Answer Yes

Document Name

Comment

The footnote provides necessary clarity.

Likes 0

Dislikes 0

Response

Leonard Kula - Independent Electricity System Operator - 2

Answer Yes

Document Name

Comment

We agree that the proposed footnote will provide the necessary clarification, but suggest to change “certifications” to certificates” to conform with the language used in the requirements.

Likes 0

Dislikes 0

Response

Thank you for your comment. The language referenced is suggested language provided by the SAR DT. The actual language will be developed by the standard drafting team during the next phase of this project.

Ginette Lacasse - Seattle City Light - 1,3,4,5,6 - WECC, Group Name Seattle City Light Ballot Body

Answer Yes

Document Name

Comment

No Comments

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

No comment	
Likes 0	
Dislikes 0	
Response	
Jamie Monette - Allete - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Alex Ybarra - Public Utility District No. 2 of Grant County, Washington - 1,4,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

LeRoy Patterson - Public Utility District No. 2 of Grant County, Washington - 1,4,5,6	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
John Williams - Tallahassee Electric (City of Tallahassee, FL) - 1,3,5	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Kristine Ward - Seminole Electric Cooperative, Inc. - 1,3,4,5,6 - FRCC	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Lauren Price - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Laura Nelson - IDACORP - Idaho Power Company - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Amy Casuscelli - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC,SPP RE	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
sean erickson - Western Area Power Administration - 1,6	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Dana Klem - Midwest Reliability Organization - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Mike Smith - Manitoba Hydro - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Michelle Amarantos - APS - Arizona Public Service Co. - 1,3,5,6	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Karie Barczak - DTE Energy - Detroit Edison Company - 3,4,5, Group Name DTE Energy - DTE Electric	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Stephanie Burns - International Transmission Company Holdings Corporation - 1 - MRO,SPP RE,RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
John Merrell - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

Elizabeth Axson - Electric Reliability Council of Texas, Inc. - 2

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

2. The PRT suggests that PER-004-2 be retired based on the identified duplicate requirements. Do you agree that his standard should be retired? If not, please explain in the comment area below.

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer No

Document Name

Comment

Texas RE is concerned there could be a potential reliability gap in retiring PER-004-2 R1. The SAR argues PER-004-2 is duplicative and all requirements are covered in other reliability standards. Texas RE is concerned that without an explicit requirement to be staffed with NERC-certified operators 24/7 the RCs' control centers may not be staffed with adequately trained personnel. Is the SDT's position that

without the explicit obligation in PER-004-2 R1 that there would be a continuing explicit obligation for RCs to be staffed with NERC-certified operators 24/7? If so, please explain and indicate the specific standard requirements including such compliance responsibility.

Likes 0

Dislikes 0

Response

The SAR DT determined that a RC maintaining Reliable Operations requires staffing 24/7; which is inherent in an RC fulfilling the compliance obligations for requirements identified on pages 3, 4 and 5 of the SAR.

With regards to your comment concerning adequately trained personnel, training requirements are stated in PER-005.

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

Answer Yes

Document Name

Comment

We would like to thank the drafting team for their efforts of pointing out the redundancy associated with this standard.

Likes 0

Dislikes 0

Response

Thank you for your affirmative response and clarifying comment.

Dana Klem - Midwest Reliability Organization - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer Yes

Document Name

Comment

The NSRF agrees with the PRT recommendation for retirement of PER-004-2.

Likes 0

Dislikes 0

Response

Thank you for your affirmative response and clarifying comment.

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

Answer Yes

Document Name

Comment

No comment

Likes 0

Dislikes 0

Response

Ginette Lacasse - Seattle City Light - 1,3,4,5,6 - WECC, Group Name Seattle City Light Ballot Body

Answer Yes

Document Name

Comment

No Comments

Likes 0

Dislikes 0	
Response	
Elizabeth Axson - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
John Merrell - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable, Group Name ACES Standards Collaborators	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Karie Barczak - DTE Energy - Detroit Edison Company - 3,4,5, Group Name DTE Energy - DTE Electric	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Michael Cruz-Montes - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
sean erickson - Western Area Power Administration - 1,6	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Amy Casuscelli - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC,SPP RE	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Laura Nelson - IDACORP - Idaho Power Company - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Lauren Price - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Leonard Kula - Independent Electricity System Operator - 2	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Kristine Ward - Seminole Electric Cooperative, Inc. - 1,3,4,5,6 - FRCC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
John Williams - Tallahassee Electric (City of Tallahassee, FL) - 1,3,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

LeRoy Patterson - Public Utility District No. 2 of Grant County, Washington - 1,4,5,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Alex Ybarra - Public Utility District No. 2 of Grant County, Washington - 1,4,5,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Mike Smith - Manitoba Hydro - 1,3,5,6

Answer

Document Name

Comment

This Standard is not applicable to Manitoba Hydro.

Likes 0

Dislikes 0

Response

Thank you for your clarifying comment.

Jamie Monette - Allete - Minnesota Power, Inc. - 1

Answer

Document Name

Comment

We are not an RC.

Likes 0

Dislikes 0

Response

Thank you for your clarifying comment.

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

Answer

Document Name

Comment

PER-004-2 does not apply to BPA as BPA is not registered as a Reliability Coordinator.

Likes 0

Dislikes 0

Response

Thank you for your clarifying comment.

3. Do you know of any additional requirements that the PRT has not identified to justify the retirement of PER-004-2? If yes, please identify the standard and requirement in the comment area below.

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

Answer No

Document Name

Comment

No comment

Likes 0

Dislikes 0

Response

Alex Ybarra - Public Utility District No. 2 of Grant County, Washington - 1,4,5,6

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

LeRoy Patterson - Public Utility District No. 2 of Grant County, Washington - 1,4,5,6

Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
John Williams - Tallahassee Electric (City of Tallahassee, FL) - 1,3,5	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Kristine Ward - Seminole Electric Cooperative, Inc. - 1,3,4,5,6 - FRCC	
Answer	No
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Leonard Kula - Independent Electricity System Operator - 2	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Lauren Price - American Transmission Company, LLC - 1	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	No

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Laura Nelson - IDACORP - Idaho Power Company - 1	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Amy Casuscelli - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC,SPP RE	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

sean erickson - Western Area Power Administration - 1,6

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Michael Cruz-Montes - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Dana Klem - Midwest Reliability Organization - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Karie Barczak - DTE Energy - Detroit Edison Company - 3,4,5, Group Name DTE Energy - DTE Electric

Answer

No

Document Name

Comment

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

No

Document Name

Comment

Likes 0

Dislikes 0

Response

Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group	
Answer	No
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable, Group Name ACES Standards Collaborators	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
John Merrell - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Elizabeth Axson - Electric Reliability Council of Texas, Inc. - 2

Answer No

Document Name

Comment

Likes 0

Dislikes 0

Response

Ginette Lacasse - Seattle City Light - 1,3,4,5,6 - WECC, Group Name Seattle City Light Ballot Body

Answer Yes

Document Name

Comment

No Comments

Likes 0

Dislikes 0

Response

Stephanie Burns - International Transmission Company Holdings Corporation - 1 - MRO,SPP RE,RF

Answer Yes

Document Name

Comment

Likes 0	
Dislikes 0	
Response	
Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	
Document Name	
Comment	
PER-004-2 does not apply to BPA as BPA is not registered as a Reliability Coordinator.	
Likes 0	
Dislikes 0	
Response	
Thank you for your clarifying comment.	
Jamie Monette - Allete - Minnesota Power, Inc. - 1	
Answer	
Document Name	
Comment	
We are not an RC.	
Likes 0	
Dislikes 0	

Response**Mike Smith - Manitoba Hydro - 1,3,5,6****Answer****Document Name****Comment**

This Standard is not applicable to Manitoba Hydro.

Likes 0

Dislikes 0

Response

Thank you for your clarifying comment.

End of Report