

July 28, 2021

Cory Danson and Michael B. Hoke (on behalf of the PCGC)

Dear Sirs:

Thank you for submitting a Standard Authorization Request (SAR) dated July 9, 2019 for revising PER-003-2 to propose a single System Operator Certification credential.

The Standards Committee (SC) received your request to withdraw the SAR on the basis of delayed findings from a joint task force formed to investigate the impacts on credential maintenance of the change to one credential. Pursuant to Section 4.2 of the NERC Standard Processes Manual (SPM), Appendix 3A to the NERC Rules of Procedure, I am writing to inform you that on July 21, 2021, the SC rejected the SAR submitted by the Personnel Certification and Governance Committee (PCGC). This action by the SC formally concludes Project 2019-05. The Standards Drafting Team (SDT) will be informed of the conclusion of this project.

For additional information on this matter, please see the attached background document and the SAR. These documents were considered at the July 21, 2021 SC meeting.

Sincerely,



Amy Casuscelli
Chair, NERC Standards Committee

Cory Danson, Chair, PCGC
Michael B. Hoke, Vice Chair, PCGC
Barbra Nutter, Secretary, PCGC
Brett Hallborg, Chair, Project 2019-05 Modifications to PER-003-2
Mark Riley, Vice Chair, Project 2019-05 Modifications to PER-003-2

Enclosures:
Standards Committee Background Document
Modifications to PER-003-2 SAR

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Project 2019-05 Modifications to PER-003-2

Action

- Withdraw the PER-003-2 Standard Authorization Request (SAR); and
- Disband the Project 2019-05 Modifications to PER-003-2 Standard Drafting Team (SDT)

Background

The Personnel Certification Governance Committee (PCGC), in conjunction with the Credential Maintenance Working Group, formed a joint task force to investigate the potential impacts of moving from four credentials to one credential in conjunction with changing the required CEHs. Until this investigation has been completed and the joint task force has obtained the necessary technical justification to support NERC's effort to again move forward with Project 2019-05 PER-003, the PCGC is requesting to withdraw the SAR.

This task force submitted the Project 2019-05 Modifications to PER-003-2 SAR, which was accepted by the Standards Committee (SC) on July 24, 2019 and posted for public comment from August 1 to August 30, 2019. On October 23, 2019, the SC appointed the PER-003-2 SAR Drafting Team. The SAR Drafting team met in November 2019 to make modifications to the SAR. The SAR Drafting Team was appointed as the Standard Drafting Team and the redline SAR was accepted by the SC on December 18, 2019.

Standard Authorization Request (SAR)

Complete and submit this form, with attachment(s) to the [NERC Help Desk](#). Upon entering the Captcha, please type in your contact information, and attach the SAR to your ticket. Once submitted, you will receive a confirmation number which you can use to track your request.

The North American Electric Reliability Corporation (NERC) welcomes suggestions to improve the reliability of the bulk power system through improved Reliability Standards.

Requested information			
SAR Title:	Modification to PER-003-2		
Date Submitted:	09 July 2019		
SAR Requester			
Name:	Personnel Certification and Governance Committee (Chair – Mike Anderson)		
Organization:	NERC		
Telephone:	(614) 413-2311	Email:	mcanderson@aep.com
SAR Type (Check as many as apply)			
<input type="checkbox"/>	New Standard	<input type="checkbox"/>	Imminent Action/ Confidential Issue (SPM Section 10)
<input checked="" type="checkbox"/>	Revision to Existing Standard	<input type="checkbox"/>	Variance development or revision
<input type="checkbox"/>	Add, Modify or Retire a Glossary Term	<input type="checkbox"/>	Other (Please specify)
<input type="checkbox"/>	Withdraw/retire an Existing Standard		
Justification for this proposed standard development project (Check all that apply to help NERC prioritize development)			
<input type="checkbox"/>	Regulatory Initiation	<input checked="" type="checkbox"/>	NERC Standing Committee Identified
<input type="checkbox"/>	Emerging Risk (Reliability Issues Steering Committee) Identified	<input type="checkbox"/>	Enhanced Periodic Review Initiated
<input type="checkbox"/>	Reliability Standard Development Plan	<input type="checkbox"/>	Industry Stakeholder Identified
Industry Need (What Bulk Electric System (BES) reliability benefit does the proposed project provide?):			
Enhanced BES Reliability			
Purpose or Goal (How does this proposed project provide the reliability-related benefit described above?):			
Referencing the PCGC's "One System Operator Certification credential" whitepaper, all System Operators would hold the same Certification credential. This better serves reliability by ensuring all System Operators, regardless of their company's registration or credential of choice, have the same base knowledge. This knowledge is demonstrated through the System Operator Certification process.			
Project Scope (Define the parameters of the proposed project):			
Modify Reliability Standard PER-003-2 by consolidating four separate System Operation Certification credentials into a single credential. Team will develop the implementation plan timeline in coordination with the PCGC transition plan.			

Requested information
Detailed Description (Describe the proposed deliverable(s) with sufficient detail for a drafting team to execute the project. If you propose a new or substantially revised Reliability Standard or definition, provide: (1) a technical justification ¹ which includes a discussion of the reliability-related benefits of developing a new or revised Reliability Standard or definition, and (2) a technical foundation document (e.g., research paper) to guide development of the Standard or definition):
Modify Reliability Standard PER-003-2 by consolidating four separate System Operation Certification credentials into a single credential. PER-005 did not exist at the inception of system operator certification. PER-003-2 is a personal certification of minimal knowledge and skills; whereas PER-005 addresses more specific reliability related tasks for entity qualifications/requirements. The team will consider the relationship between PER-003-2 and PER-005-2 as well as the relationship between PER-003-2 and the System Operator Certification Program Manual.
Cost Impact Assessment, if known (Provide a paragraph describing the potential cost impacts associated with the proposed project):
Minimal cost impact to industry as bundled in the PCGC's budget recovered through existing exam and renewal fees.
Please describe any unique characteristics of the BES facilities that may be impacted by this proposed standard development project (e.g., Dispersed Generation Resources):
N/A
To assist the NERC Standards Committee in appointing a drafting team with the appropriate members, please indicate to which Functional Entities the proposed standard(s) should apply (e.g., Transmission Operator, Reliability Coordinator, etc. See the most recent version of the NERC Functional Model for definitions):
Reliability Coordinator, Transmission Operator, Balancing Authority
Do you know of any consensus building activities ² in connection with this SAR? If so, please provide any recommendations or findings resulting from the consensus building activity.
Industry circulated "One Credential" whitepaper and associated comments/responses from the PCGC
Are there any related standards or SARs that should be assessed for impact as a result of this proposed project? If so, which standard(s) or project number(s)?
None
Are there alternatives (e.g., guidelines, white paper, alerts, etc.) that have been considered or could meet the objectives? If so, please list the alternatives.
None

¹ The NERC Rules of Procedure require a technical justification for new or substantially revised Reliability Standards. Please attach pertinent information to this form before submittal to NERC.

² Consensus building activities are occasionally conducted by NERC and/or project review teams. They typically are conducted to obtain industry inputs prior to proposing any standard development project to revise, or develop a standard or definition.

Reliability Principles	
Does this proposed standard development project support at least one of the following Reliability Principles (Reliability Interface Principles)? Please check all those that apply.	
<input checked="" type="checkbox"/>	1. Interconnected bulk power systems shall be planned and operated in a coordinated manner to perform reliably under normal and abnormal conditions as defined in the NERC Standards.
<input checked="" type="checkbox"/>	2. The frequency and voltage of interconnected bulk power systems shall be controlled within defined limits through the balancing of real and reactive power supply and demand.
<input type="checkbox"/>	3. Information necessary for the planning and operation of interconnected bulk power systems shall be made available to those entities responsible for planning and operating the systems reliably.
<input checked="" type="checkbox"/>	4. Plans for emergency operation and system restoration of interconnected bulk power systems shall be developed, coordinated, maintained and implemented.
<input type="checkbox"/>	5. Facilities for communication, monitoring and control shall be provided, used and maintained for the reliability of interconnected bulk power systems.
<input checked="" type="checkbox"/>	6. Personnel responsible for planning and operating interconnected bulk power systems shall be trained, qualified, and have the responsibility and authority to implement actions.
<input checked="" type="checkbox"/>	7. The security of the interconnected bulk power systems shall be assessed, monitored and maintained on a wide area basis.
<input type="checkbox"/>	8. Bulk power systems shall be protected from malicious physical or cyber attacks.

Market Interface Principles	
Does the proposed standard development project comply with all of the following Market Interface Principles ?	Enter (yes/no)
1. A reliability standard shall not give any market participant an unfair competitive advantage.	Yes
2. A reliability standard shall neither mandate nor prohibit any specific market structure.	Yes
3. A reliability standard shall not preclude market solutions to achieving compliance with that standard.	Yes
4. A reliability standard shall not require the public disclosure of commercially sensitive information. All market participants shall have equal opportunity to access commercially non-sensitive information that is required for compliance with reliability standards.	Yes

Identified Existing or Potential Regional or Interconnection Variances	
Region(s)/ Interconnection	Explanation
<i>e.g.</i> , NPCC	

For Use by NERC Only

SAR Status Tracking (Check off as appropriate).	
<input type="checkbox"/> Draft SAR reviewed by NERC Staff	<input type="checkbox"/> Final SAR endorsed by the SC
<input type="checkbox"/> Draft SAR presented to SC for acceptance	<input type="checkbox"/> SAR assigned a Standards Project by NERC
<input type="checkbox"/> DRAFT SAR approved for posting by the SC	<input type="checkbox"/> SAR denied or proposed as Guidance document

Version History

Version	Date	Owner	Change Tracking
1	June 3, 2013		Revised
1	August 29, 2014	Standards Information Staff	Updated template
2	January 18, 2017	Standards Information Staff	Revised
2	June 28, 2017	Standards Information Staff	Updated template
3	February 22, 2019	Standards Information Staff	Added instructions to submit via Help Desk