

Compliance Operations

Draft Reliability Standard Compliance Guidance for PER-005-2

July 1, 2013

Introduction

The NERC Compliance department (Compliance) worked with the PER-005 informal ad hoc group (PER Group) in a review of pro forma standard PER-005-2. The purpose of the review is to discuss the requirements of the pro forma standard to obtain an understanding of its intended purpose and the evidence necessary to support compliance. The purpose of this document is to address specific questions posed by the PER Group and Compliance in order to aid in the drafting of the requirements and provide a level of understanding regarding evidentiary support necessary to demonstrate compliance. However, this document makes no assessment as to the enforceability of the standard.

While all testing requires levels of auditor judgment, participating in these reviews allows Compliance to develop training and approaches to support a high level of consistency in audits conducted by the Regional Entities. The following questions and answers are intended to both assist the PER Group in further refining the standard and to serve as a resource in the development of training for auditors.

PER-005-2 Questions

Question 1

For Requirement 1, what criteria would an auditor use to determine if a registered entity uses a systematic (SAT) approach to develop training?

Compliance Response to Question 1

Without a definition of, or reference to, a specific SAT, it would be difficult for auditors to assess an entity's training development program because no benchmark is provided within the standard. Compliance recommends the PER Group consider referencing a specific SAT process for registered entities to follow in developing training.

Question 2

Is an auditor to assess a registered entity based on a SAT for the support personnel referenced in requirement 4?

Compliance Response to Question 2

No, since the requirement does not specify use of a SAT, then Compliance will not require training be developed based on a SAT for requirement 4.

Question 3

Since requirement 5 does not include the same sub-requirements as requirement 1 to define a SAT, do entities have to adhere to the requirement 1 sub-requirements for requirement 5?

Compliance Response to Question 3

As with requirement 1, without a definition of, or reference to, a specific SAT, it would be difficult for auditors to assess an entity's training development program because no benchmark is provided within the standard. Compliance recommends the PER Group consider referencing a specific SAT process for registered entities to follow in developing training. Compliance Operations also notes that requirement 5 does not include the sub-requirements found in requirement 1 and is noting the inconsistency.

Conclusion

In general, Compliance finds this pro forma standard provides a reasonable level of guidance for Compliance auditors to conduct audits in a consistent manner. The standard establishes timelines, data requirements, and ownership of specific actions. In general, the standard would provide reasonable guidance to develop training to enable Compliance auditors to execute their reviews. Compliance does recommend the PER Group address the issues noted in the previous section of this document related to the standard.

Following final approval of the Reliability Standard, Compliance will develop the final Reliability Standards Auditor Worksheet (RSAW) and associated training. Attachment A represents the version of the pro forma standard requirements referenced in this document.

Attachment A

Requirements and Measures

- R1.** Each Reliability Coordinator, Balancing Authority, Transmission Operator, and Transmission Owner shall use a systematic approach to training (SAT) to develop and implement a training program for its System Personnel as follows [*Violation Risk Factor: Medium*] [*Time Horizon: Long-term Planning*]
- 1.1.** Each Reliability Coordinator, Balancing Authority, Transmission Operator, and Transmission Owner shall review and update its list of tasks identified in part 1.1 each calendar year.
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 - 1.2.** Each Reliability Coordinator, Balancing Authority, Transmission Operator, and Transmission Owner shall design and develop training materials based on the task list created in part 1.1 and part 1.1.1.
 - 1.3.** Each Reliability Coordinator, Balancing Authority, Transmission Operator, and Transmission Owner shall deliver the training established in part 1.2 to System Personnel.
 - 1.4.** Each Reliability Coordinator, Balancing Authority, Transmission Operator, and Transmission Owner shall conduct an evaluation each calendar year of the training program established in Requirement R1, to identify any needed changes to the training program and shall implement the changes identified.
- M1.** Each Reliability Coordinator, Balancing Authority, Transmission Operator, and Transmission Owner shall
- M1.1** Each Reliability Coordinator, Balancing Authority, Transmission Operator, and Transmission Owner shall have available for inspection its company-specific Real-time reliability-related task list, with the date of the last update, as specified in Requirement R1 parts 1.1 and 1.1.1.
 - M1.2** Each Reliability Coordinator, Balancing Authority, Transmission Operator, and Transmission Owner shall have available for inspection training materials, as specified in Requirement R1 part 1.2.
 - M1.3** Each Reliability Coordinator, Balancing Authority, Transmission Operator, and Transmission Owner shall have available for inspection System Personnel training records showing the names of the people trained, the title of the training delivered and the dates of delivery to show that it delivered the training, as specified in Requirement R1 part 1.3.
 - M1.4** Each Reliability Coordinator, Balancing Authority, Transmission Operator, and Transmission Owner shall have available for inspection evidence (such as instructor

observations, trainee feedback, supervisor feedback, course evaluations, learning assessments, or internal audit results) that it performed an annual training program evaluation, as specified in Requirement R1 part 1.4.

- R2.** Each Reliability Coordinator, Balancing Authority, Transmission Operator, and Transmission Owner shall verify at least once, the capabilities of its System Personnel identified to perform each assigned task in Requirement R1 parts 1.1 and 1.1.1. [*Violation Risk Factor: High*] [*Time Horizon: Long-term Planning*]
- 2.1.** Within six months of a modification or addition of Bulk Electric System company-specific Real-time reliability-related tasks, each Reliability Coordinator, Balancing Authority, Transmission Operator, and Transmission Owner shall verify the capabilities of each of its System Personnel to perform the new or modified tasks identified in Requirement R1 part 1.1.1.
- M2.** Each Reliability Coordinator, Balancing Authority, Transmission Operator, and Transmission Owner shall have available for inspection evidence to show that it verified the capabilities of each of the System Personnel identified to perform each assigned task in Requirement R1 parts 1.1 and 1.1.1, as specified in Requirement R2. This evidence can be documents such as training records showing successful completion of tasks with the employee name and date; supervisor check sheets showing the employee name, date, and task completed; or the results of learning assessments.
- R3.** Each Reliability Coordinator, Balancing Authority, Transmission Operator, and Transmission Owner that has operational authority or control over Facilities with established IROLs or has established operating guides or protection systems to mitigate IROL violations shall provide its System Personnel with emergency operations training using simulation technology such as a simulator, virtual technology, or other technology that replicates the operational behavior of the BES. [*Violation Risk Factor: Medium*] [*Time Horizon: Long-term Planning*]
- 3.1.** Each Reliability Coordinator, Balancing Authority, Transmission Operator, and Transmission Owner that gains operational authority or control over a Facility with an established IROL or establishes operating guides or protection systems to mitigate IROL violations shall comply with Requirement R3 within 6 months of gaining that authority, control or establishing such operating guides or protection systems.
- M3.** Each Reliability Coordinator, Balancing Authority, Transmission Operator, and Transmission Owner shall have available for inspection training records that provide evidence that System Personnel completed training that includes the use of simulation technology, as specified in Requirement R3.
- M3.1** Each Reliability Coordinator, Balancing Authority, Transmission Operator, and Transmission Owner shall have available for inspection training records that provide evidence that System Personnel completed training that included the use of simulation

technology, as specified in Requirement R3, within 6 months of gaining that authority, control or establishing such operating guides or protection systems.

- R4.** Each Reliability Coordinator, Balancing Authority, Transmission Operator, and Transmission Owner shall establish and implement training for Support Personnel specific to those Real-time reliability-related tasks identified by the entity pursuant to Requirement R1 part 1.1 and part 1.1.1 that relate to the Support Personnel's job function. *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*
- M4.** Each Reliability Coordinator, Balancing Authority, Transmission Operator, and Transmission Owner shall have available for inspection training materials and training records that provide evidence that Support Personnel completed training. This evidence can be documents such as training records showing successful completion of training with the employee name and date.
- R5.** Each Generator Operator shall use a systematic approach to training to establish and implement training for its personnel described in applicability section 4.1.5 as follows: *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*
- 5.1.** Each Generator Operator shall coordinate with its Reliability Coordinator, Balancing Authority, Transmission Operator, and Transmission Owner to identify training topics that address the impact of the decisions and actions of a GOP's personnel as it pertains to the reliability of the Bulk Electric System during normal and emergency operations.
- 5.1.1.** Each Reliability Coordinator, Balancing Authority, Transmission Operator, and Transmission Owner shall provide input as requested by the Generator Operator.
- M5.** Each Generator Operator shall have available for inspection training materials and training records that provide evidence that its applicable personnel completed training. This evidence can be documents such as training records showing successful completion of training with the employee name and date.
- M5.1** Each Generator Operator GOP shall have available for inspection evidence, such as an email or attestation, that it coordinated with the RC, BA, TOP, and TO in establishing the training requirements.
- M5.1.1** Each Reliability Coordinator, Balancing Authority, Transmission Operator, and Transmission Owner shall have available for inspection evidence, such as an email or attestation, that it provided input to the Generator Operator.