

## **SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

*The latest version of this SAR (RA\_CERTIFICATION\_01\_01) is posted on the Standards web site at: <http://www.nerc.com/~filez/sar-approved.html>*

*E-mail this form between December 1–January 10, 2003 to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with “SAR Comments” in the subject line.*

***Please review the SAR and answer the questions in the yellow boxes.***

NOTE: The SAR contains the process for certification, followed by the criteria for certification; the questions in this SAR Comment Form are presented in the same order as the SAR.

*If you have questions, please call Maureen Long at 305-891-5497 or send a question to [spm@nerc.com](mailto:spm@nerc.com).*

### **Background**

The Organization Certification Task Force (OCTF) was formed several months ago to draft certification and registration programs to replace the existing Control Area certification and organization registration processes and procedures.

The OCTF held a series of workshops and posted a White Paper to collect preliminary industry comments on the criteria relevant to the new functional entities and there-by develop new processes and procedures for certifying each of these entities. (All the comments collected during these preliminary steps are posted at <http://www.nerc.com/~filez/octf.html>)

This SAR is one of four SARs being posted simultaneously for comment. These SARs, collectively, identify the certification criteria for the Reliability Authority (RA), Balancing Authority (BA), Interchange Authority (IA) and Transmission Operator (TOP). At this time, these are the only functions being considered for certification. Other functions may be considered for certification in the future. (The functions referred to in this document are the functions identified in the NERC Functional Model. <http://www.nerc.com/~oc/fmrtg.html>)

Certification Criteria are those requirements that an entity must meet to be “Certified” by NERC or another certifying entity such as one of the NERC Regions. NERC Certification is an indication that an organization has the resources in place and the ability to perform a reliability function, such as a Balancing Authority, Interchange Authority, etc. Entities that attain their Certification status must comply with applicable NERC Reliability Standards and criteria. Entities that serve multiple reliability functions may need to attain more than one certification. Where an entity wants multiple certifications, we expect to develop a system whereby that entity could apply for all certifications at one time.

**SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

<b>SAR Commenter Information</b>	<b>Which Industry Segment do you represent?</b>
Name Karl Kohlrus	<input type="checkbox"/> Trans Owners <input type="checkbox"/> <b>Brokers, Aggregators, and Marketers</b>
Organization City Water, Light & Power	<input type="checkbox"/> RTOs, ISOs, RRCs <input type="checkbox"/> Large Electricity End Users
Telephone 217-321-1391	<input type="checkbox"/> LSEs <input type="checkbox"/> Small Electricity Users
E-mail kkohlrus@cwlp.com	<input type="checkbox"/> TDUs <input type="checkbox"/> <b>Federal, State, and Provincial Regulatory or other Government Entities</b>
	<input checked="" type="checkbox"/> Generators

**Questions 1-7 address the proposed Process for certifying Reliability Authority**

**1. Do you agree that there is a reliability-related need to certify the Reliability Authority function?**

Yes  
 No  
 Neutral

Comments:

**2. When there are multiple regions involved, should one region take the lead and make the certification decision or should all involved regions be more actively involved in the interim milestones associated with certification?**

One Region should take the lead and make the certification decision.  
 All Regions should be actively involved in the interim milestones of certification.

Comments NERC should do the certification. Having one region take the lead for example in the case of MISO, which spans four NERC regions, does not seem appropriate.

**3. Who should certify the Reliability Authority function?**

- Region
- NERC
- RTO
- Independent Team

Comments:

**The recommended Review Team consists of a minimum of three individuals selected from at least three of the categories listed below:**

- **Interchange Authority**
- **Balancing Authority**
- **Reliability Authority**
- **Transmission Operator**
- **Regional Compliance Committee member**
- **Regional Operating Committee member**
- **Representative of NERC Staff**
- **Representative from another NERC Region**
- **Representative from an RTO, when applicable**

**In the alternative, the Region may elect, with the applicant agreement, to engage a completely independent review team.**

**4. Do we have the appropriate review team members identified?**

- Yes
- No

Comments:

**5. Should a NERC staff person be assigned to each review team?**

- Yes
- No

Comments

**6. Have we included anything in the certification process that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

Yes

No

Comments: I think regional review could cause problems in the case of MISO which spans four NERC regions.

**7. Have we missed a step in the certification process that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

Comments:

**Questions 8-13 address the proposed Criteria included in the SAR.**

**8. Which of the following agreements do you think are necessary? (Check all that you feel should apply)**

An agreement defining responsibilities and authority (during normal and emergency conditions) of the Reliability Authority with respect to

Each adjacent Reliability Authority

Each applicable Balancing Authority

Each applicable Interchange Authority

Each applicable Transmission Operator

Each applicable Transmission Service Provider

Comments: There should still be a streamlined process that allows a traditional Control Area which encompasses all of these functions to be certified without needing all these agreements.

**9. What other agreements should be required for the Reliability Authority?**

Comments:

**10. Who should be required to sign a confidentiality agreement?**

- Reliability Authorities
- Balancing Authorities
- Interchange Authorities
- Transmission Operators
- Transmission Service Providers

Comments:

**11. Have we included anything in the certification criteria that you think is unnecessary?  
If yes, please provide details on what you think we should eliminate.**

- Yes
- No

Comments:

**12. Have we missed anything in the certification criteria that you think is necessary? If  
yes, please provide details on what you think should be added.**

- Yes
- No

Comments: Allow a single certification for traditional Control Areas.

**13. If you are aware of any Regional Differences that need to be addressed in this SAR,  
please highlight them here.**

Regional Difference: With the proposed SAR of a single NERC region taking the lead, there are regional differences in the case of MISO.

**14. Other Comments on this Certification SAR:**

Comments:

**Procedures currently exist for re-certification of control areas. Considerations are being given for inclusion of re -certification in the certification standards.**

**15. When should re -certification occur?**

Check all that apply

- Periodic
- Significant change in footprint, corporate organization, or operation
- Repetitive Non-Compliance with Reliability Standards
- Flagrant violation of Reliability Standards

**Comments:**

## **SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

*The latest version of this SAR (RA\_CERTIFICATION\_01\_01) is posted on the Standards web site at: <http://www.nerc.com/~filez/sar-approved.html>*

*E-mail this form between December 1–January 10, 2003 to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with “SAR Comments” in the subject line.*

***Please review the SAR and answer the questions in the yellow boxes.***

NOTE: The SAR contains the process for certification, followed by the criteria for certification; the questions in this SAR Comment Form are presented in the same order as the SAR.

*If you have questions, please call Maureen Long at 305-891-5497 or send a question to [spm@nerc.com](mailto:spm@nerc.com).*

### **Background**

The Organization Certification Task Force (OCTF) was formed several months ago to draft certification and registration programs to replace the existing Control Area certification and organization registration processes and procedures.

The OCTF held a series of workshops and posted a White Paper to collect preliminary industry comments on the criteria relevant to the new functional entities and there-by develop new processes and procedures for certifying each of these entities. (All the comments collected during these preliminary steps are posted at <http://www.nerc.com/~filez/octf.html>)

This SAR is one of four SARs being posted simultaneously for comment. These SARs, collectively, identify the certification criteria for the Reliability Authority (RA), Balancing Authority (BA), Interchange Authority (IA) and Transmission Operator (TOP). At this time, these are the only functions being considered for certification. Other functions may be considered for certification in the future. (The functions referred to in this document are the functions identified in the NERC Functional Model. <http://www.nerc.com/~oc/fmrtg.html>)

Certification Criteria are those requirements that an entity must meet to be “Certified” by NERC or another certifying entity such as one of the NERC Regions. NERC Certification is an indication that an organization has the resources in place and the ability to perform a reliability function, such as a Balancing Authority, Interchange Authority, etc. Entities that attain their Certification status must comply with applicable NERC Reliability Standards and criteria. Entities that serve multiple reliability functions may need to attain more than one certification. Where an entity wants multiple certifications, we expect to develop a system whereby that entity could apply for all certifications at one time.

**SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

<b>SAR Commenter Information</b>		<b>Which Industry Segment do you represent?</b>	
Name	Art Giardino	<input checked="" type="checkbox"/> Trans Owners	<input type="checkbox"/> <b>Brokers, Aggregators, and Marketers</b>
Organization	Public Service Electric & Gas	<input type="checkbox"/> RTOs, ISOs, RRCs	<input type="checkbox"/> Large Electricity End Users
Telephone	(973) 430-6374	<input type="checkbox"/> LSEs	<input type="checkbox"/> Small Electricity Users
E-mail	arthur.giardino@pseg.com	<input type="checkbox"/> TDUs	<input type="checkbox"/> <b>Federal, State, and Provincial Regulatory or other Government Entities</b>
		<input type="checkbox"/> Generators	

**Questions 1-7 address the proposed Process for certifying Reliability Authority**

**1. Do you agree that there is a reliability-related need to certify the Reliability Authority function?**

Yes  
 No  
 Neutral

Comments: This SAR requires certification of Organizations who will perform or implement actions necessary for the reliable planning, scheduling, operation and maintenance of the interconnected bulk power system. The Reliability Standards that will govern these activities have not been developed. It is therefore premature to certify a performing organization when the rules of performance do not exist. For this reason alone, this SAR should be cancelled.

**2. When there are multiple regions involved, should one region take the lead and make the certification decision or should all involved regions be more actively involved in the interim milestones associated with certification?**

One Region should take the lead and make the certification decision.  
 All Regions should be actively involved in the interim milestones of certification.

Comments Neither, due to the mismatch between Regional councils and the RTOs, certification should not be a Regional Function.

**3. Who should certify the Reliability Authority function?**

- Region
- NERC
- RTO
- Independent Team

Comments:

**The recommended Review Team consists of a minimum of three individuals selected from at least three of the categories listed below:**

- **Interchange Authority**
- **Balancing Authority**
- **Reliability Authority**
- **Transmission Operator**
- **Regional Compliance Committee member**
- **Regional Operating Committee member**
- **Representative of NERC Staff**
- **Representative from another NERC Region**
- **Representative from an RTO, when applicable**

**In the alternative, the Region may elect, with the applicant agreement, to engage a completely independent review team.**

**4. Do we have the appropriate review team members identified?**

- Yes
- No

Comments: This list is a mix of functions and performing entities, and is as such invalid.

**5. Should a NERC staff person be assigned to each review team?**

- Yes
- No

Comments RA Organizational Certification is not a core reliability function and is out of NERC scope.



**6. Have we included anything in the certification process that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

Yes

No

Comments: The NERC Functional Model specifically states that it is not aligned with any organizational structure, nor will it define how functions are implemented. Establishing certification of the Organizations performing each function changes the model into an organizational driver and will constrain the "how" a given function is implemented. For this reason alone, this SAR should be cancelled.

**7. Have we missed a step in the certification process that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

Comments: Certification of organizations performing reliability functions will cause costs to increase for the target organization, the Regional Council, and NERC. Collection of these costs are not included in current tariffs and Operating Agreements. In addition, if a single organization chooses to perform multiple functions, they are subject to redundant assessment and reporting requirements. Until a thorough cost benefit analysis is performed that clearly demonstrates a measurable reliability enhancement that justifies these costs, this SAR should be cancelled.

***Questions 8-13 address the proposed Criteria included in the SAR.***

**8. Which of the following agreements do you think are necessary? (Check all that you feel should apply)**

An agreement defining responsibilities and authority (during normal and emergency conditions) of the Reliability Authority with respect to

Each adjacent Reliability Authority

Each applicable Balancing Authority

Each applicable Interchange Authority

Each applicable Transmission Operator

Each applicable Transmission Service Provider

Comments: None, function of the RTO.

**9. What other agreements should be required for the Reliability Authority?**

Comments:

**10. Who should be required to sign a confidentiality agreement?**

- Reliability Authorities
- Balancing Authorities
- Interchange Authorities
- Transmission Operators
- Transmission Service Providers

Comments: All participants. Any violation should have immediate, severe sanctions.

**11. Have we included anything in the certification criteria that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

- Yes
- No

Comments:

**12. Have we missed anything in the certification criteria that you think is necessary? If yes, please provide details on what you think should be added.**

- Yes
- No

Comments:

**13. If you are aware of any Regional Differences that need to be addressed in this SAR,**

**SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

---

**please highlight them here.**

Regional Difference:

**14. Other Comments on this Certification SAR:**

Comments: Cancel it.

**Procedures currently exist for re-certification of control areas. Considerations are being given for inclusion of re-certification in the certification standards.**

**15. When should re-certification occur?**

Check all that apply

- Periodic
- Significant change in footprint, corporate organization, or operation
- Repetitive Non-Compliance with Reliability Standards
- Flagrant violation of Reliability Standards

**Comments:**None, this should not exist as a NERC Certification.

**SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

<b>SAR Commenter Information</b>	<b>Which Industry Segment do you represent?</b>
Name            Gordon Pietsch	<input checked="" type="checkbox"/> Trans Owners <input type="checkbox"/> <b>Brokers, Aggregators, and Marketers</b>
Organization    Great River Energy	<input type="checkbox"/> RTOs, ISOs, RRCs <input type="checkbox"/> Large Electricity End Users
Telephone        763-241-2235	<input type="checkbox"/> LSEs <input type="checkbox"/> Small Electricity Users
E-mail            gpietsch@GREnergy.com	<input type="checkbox"/> TDUs <input type="checkbox"/> <b>Federal, State, and Provincial Regulatory or other Government Entities</b>
	<input type="checkbox"/> Generators

**Questions 1-7 address the proposed Process for certifying Reliability Authority**

**1. Do you agree that there is a reliability-related need to certify the Reliability Authority function?**

- Yes
- No
- Neutral

Comments: While I believe there is a need to certify the Reliability Authority function, I do not believe that creating a Standard is necessary. NERC needs to have a process for certification that encompasses all functions. Creating a Certification Standard before having other Standards adopted by the industry might result in a continuous modification of a Certification Standard if this standard is to reference other Standards, which are being developed.

**2. When there are multiple regions involved, should one region take the lead and make the certification decision or should all involved regions be more actively involved in the interim milestones associated with certification?**

- One Region should take the lead and make the certification decision.
- All Regions should be actively involved in the interim milestones of certification.

Comments

**3. Who should certify the Reliability Authority function?**

- Region
- NERC
- RTO
- Independent Team

Comments:

**The recommended Review Team consists of a minimum of three individuals selected from at least three of the categories listed below:**

- **Interchange Authority**
- **Balancing Authority**
- **Reliability Authority**
- **Transmission Operator**
- **Regional Compliance Committee member**
- **Regional Operating Committee member**
- **Representative of NERC Staff**
- **Representative from another NERC Region**
- **Representative from an RTO, when applicable**

**In the alternative, the Region may elect, with the applicant agreement, to engage a completely independent review team.**

**4. Do we have the appropriate review team members identified?**

- Yes
- No

Comments: In order to insure true independence, the members of the review team should be experts in the functional area and not necessarily employed by a particular entity performing the function. This is especially true where there are marketing implications.

**5. Should a NERC staff person be assigned to each review team?**

- Yes
- No

Comments

**SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

---



**6. Have we included anything in the certification process that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

Yes

No

Comments:

**7. Have we missed a step in the certification process that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

Comments:

***Questions 8-13 address the proposed Criteria included in the SAR.***

**8. Which of the following agreements do you think are necessary? (Check all that you feel should apply)**

An agreement defining responsibilities and authority (during normal and emergency conditions) of the Reliability Authority with respect to

Each adjacent Reliability Authority

Each applicable Balancing Authority

Each applicable Interchange Authority

Each applicable Transmission Operator

Each applicable Transmission Service Provider

Comments:

**9. What other agreements should be required for the Reliability Authority?**

Comments:

**10. Who should be required to sign a confidentiality agreement?**

- Reliability Authorities
- Balancing Authorities
- Interchange Authorities
- Transmission Operators
- Transmission Service Providers

Comments: If this question is relevant to question 8 above, then it should be included in the agreement defining responsibilities and authority. If the question is related to the review team, then confidentiality agreements should be in place for those participating on the review team, especially if they are actively employed in a particular function.

**11. Have we included anything in the certification criteria that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

- Yes
- No

Comments:

**12. Have we missed anything in the certification criteria that you think is necessary? If yes, please provide details on what you think should be added.**

- Yes
- No

Comments:

**13. If you are aware of any Regional Differences that need to be addressed in this SAR, please highlight them here.**

Regional Difference:



**14. Other Comments on this Certification SAR:**

Comments:

**Procedures currently exist for re-certification of control areas. Considerations are being given for inclusion of re -certification in the certification standards.**

**15. When should re -certification occur?**

Check all that apply

- Periodic
- Significant change in footprint, corporate organization, or operation
- Repetitive Non-Compliance with Reliability Standards
- Flagrant violation of Reliability Standards

**Comments:**

**SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

<b>SAR Commenter Information</b>		<b>Which Industry Segment do you represent?</b>	
Name	Sam Jones	<input type="checkbox"/> Trans Owners	<input type="checkbox"/> <b>Brokers, Aggregators, and Marketers</b>
Organization	ERCOT ISO	<input checked="" type="checkbox"/> RTOs, ISOs, RRCs	<input type="checkbox"/> Large Electricity End Users
Telephone	512-248-3177	<input type="checkbox"/> LSEs	<input type="checkbox"/> Small Electricity Users
E-mail	sjones@ercot.com	<input type="checkbox"/> TDUs	<input type="checkbox"/> <b>Federal, State, and Provincial Regulatory or other Government Entities</b>
		<input type="checkbox"/> Generators	

**Questions 1-7 address the proposed Process for certifying Reliability Authority**

**1. Do you agree that there is a reliability-related need to certify the Reliability Authority function?**

- Yes
- No
- Neutral

Comments:

**2. When there are multiple regions involved, should one region take the lead and make the certification decision or should all involved regions be more actively involved in the interim milestones associated with certification?**

- One Region should take the lead and make the certification decision.
- All Regions should be actively involved in the interim milestones of certification.

Comments Certification should be by NERC with Region involvement as necessary

**3. Who should certify the Reliability Authority function?**

- Region
- NERC
- RTO
- Independent Team

Comments: Certification issued by NERC if recommended by an Independent Team assigned by the NERC process

**The recommended Review Team consists of a minimum of three individuals selected from at least three of the categories listed below:**

- **Interchange Authority**
- **Balancing Authority**
- **Reliability Authority**
- **Transmission Operator**
- **Regional Compliance Committee member**
- **Regional Operating Committee member**
- **Representative of NERC Staff**
- **Representative from another NERC Region**
- **Representative from an RTO, when applicable**

**In the alternative, the Region may elect, with the applicant agreement, to engage a completely independent review team.**

**4. Do we have the appropriate review team members identified?**

- Yes
- No

Comments: Independent team preferred

**5. Should a NERC staff person be assigned to each review team?**

- Yes
- No

Comments



**6. Have we included anything in the certification process that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

Yes

No

Comments:

**7. Have we missed a step in the certification process that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

Comments:

***Questions 8-13 address the proposed Criteria included in the SAR.***

**8. Which of the following agreements do you think are necessary? (Check all that you feel should apply)**

An agreement defining responsibilities and authority (during normal and emergency conditions) of the Reliability Authority with respect to

Each adjacent Reliability Authority

Each applicable Balancing Authority

Each applicable Interchange Authority

Each applicable Transmission Operator

Each applicable Transmission Service Provider

Comments:

**9. What other agreements should be required for the Reliability Authority?**

Comments:

**10. Who should be required to sign a confidentiality agreement?**

- Reliability Authorities
- Balancing Authorities
- Interchange Authorities
- Transmission Operators
- Transmission Service Providers

Comments:

**11. Have we included anything in the certification criteria that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

- Yes
- No

Comments:

**12. Have we missed anything in the certification criteria that you think is necessary? If yes, please provide details on what you think should be added.**

- Yes
- No

Comments:

**13. If you are aware of any Regional Differences that need to be addressed in this SAR, please highlight them here.**

Regional Difference:

**14. Other Comments on this Certification SAR:**

Comments:

**Procedures currently exist for re-certification of control areas. Considerations are being given for inclusion of re -certification in the certification standards.**

**15. When should re -certification occur?**

Check all that apply

- Periodic
- Significant change in footprint, corporate organization, or operation
- Repetitive Non-Compliance with Reliability Standards
- Flagrant violation of Reliability Standards

**Comments:**

## SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR

<b>SAR Commenter Information</b>	<b>Which Industry Segment do you represent?</b>
Name William Reinke	<input type="checkbox"/> Trans Owners <input type="checkbox"/> <b>Brokers, Aggregators, and Marketers</b>
Organization SERC	<input checked="" type="checkbox"/> RTOs, ISOs, RRCs <input type="checkbox"/> Large Electricity End Users
Telephone 704-875-1726	<input type="checkbox"/> LSEs <input type="checkbox"/> Small Electricity Users
E-mail wreinke@serc1.org	<input type="checkbox"/> TDUs <input type="checkbox"/> <b>Federal, State, and Provincial Regulatory or other Government Entities</b>
	<input type="checkbox"/> Generators

**Questions 1-7 address the proposed Process for certifying Reliability Authority**

**1. Do you agree that there is a reliability-related need to certify the Reliability Authority function?**

- Yes  
 No  
 Neutral

Comments: RAs need to be certified because they perform reliability functions. The certification process is a business practice and therefore should not be the subject of a standard.

**2. When there are multiple regions involved, should one region take the lead and make the certification decision or should all involved regions be more actively involved in the interim milestones associated with certification?**

- One Region should take the lead and make the certification decision.  
 All Regions should be actively involved in the interim milestones of certification.

Comments Although one region should take the lead for certification of the RA, it should not have the authority to make the certification decision unless that authority has been delegated to it by the other regions. Otherwise all regions should be parties to the certification decision.

**3. Who should certify the Reliability Authority function?**

- Region
- NERC
- RTO
- Independent Team

Comments:

**The recommended Review Team consists of a minimum of three individuals selected from at least three of the categories listed below:**

- **Interchange Authority**
- **Balancing Authority**
- **Reliability Authority**
- **Transmission Operator**
- **Regional Compliance Committee member**
- **Regional Operating Committee member**
- **Representative of NERC Staff**
- **Representative from another NERC Region**
- **Representative from an RTO, when applicable**

**In the alternative, the Region may elect, with the applicant agreement, to engage a completely independent review team.**

**4. Do we have the appropriate review team members identified?**

- Yes
- No

Comments:

**5. Should a NERC staff person be assigned to each review team?**

- Yes
- No

Comments It is not necessary or appropriate to designate NERC staff to be assigned to each review team. Further, NERC staff may not have the necessary expertise to populate all of the review teams.

**SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**



**6. Have we included anything in the certification process that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

Yes

No

Comments: We agree that the RA needs to be certified. We do not agree that the certification process should be included in a standard.

**7. Have we missed a step in the certification process that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

Comments: Consider adding provisions as follows: 1) The RA must begin operation within one year of certification. The RA must be recertified if it has not begun operation within that time frame; and 2) The process should allow for decertification of a RA in the event of a merger, acquisition, or other reason.

*Questions 8-13 address the proposed Criteria included in the SAR.*

**8. Which of the following agreements do you think are necessary? (Check all that you feel should apply)**

An agreement defining responsibilities and authority (during normal and emergency conditions) of the Reliability Authority with respect to

Each adjacent Reliability Authority

Each applicable Balancing Authority

Each applicable Interchange Authority

Each applicable Transmission Operator

Each applicable Transmission Service Provider

Comments:

**9. What other agreements should be required for the Reliability Authority?**

Comments:

**10. Who should be required to sign a confidentiality agreement?**

- Reliability Authorities
- Balancing Authorities
- Interchange Authorities
- Transmission Operators
- Transmission Service Providers

Comments:

**11. Have we included anything in the certification criteria that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

- Yes
- No

Comments:

**12. Have we missed anything in the certification criteria that you think is necessary? If yes, please provide details on what you think should be added.**

- Yes
- No

Comments: See #6, 7

**13. If you are aware of any Regional Differences that need to be addressed in this SAR, please highlight them here.**

Regional Difference:

**SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

---



**14. Other Comments on this Certification SAR:**

Comments: I believe the certification process is inappropriate for a standard. Therefore, I urge Mr Burrows and the OCTF to withdraw this request. The certification process is a business practice.

**Procedures currently exist for re-certification of control areas. Considerations are being given for inclusion of re -certification in the certification standards.**

**15. When should re -certification occur?**

Check all that apply

- Periodic
- Significant change in footprint, corporate organization, or operation
- Repetitive Non-Compliance with Reliability Standards
- Flagrant violation of Reliability Standards

**Comments:** On the assumption that the RA will be audited periodically, the audit process can serve as a surrogate for a periodic recertification. In the case of an RA, I would offer that an investigation and recertification process be initiated if/when an event occurs in its area of responsibility that involves interruption of all or a portion of the bulk electric system.

**SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

<b>SAR Commenter Information</b>		<b>Which Industry Segment do you represent?</b>	
Name	Paul M. Cafone	<input checked="" type="checkbox"/> Trans Owners	<input type="checkbox"/> <b>Brokers, Aggregators, and Marketers</b>
Organization	Public Service Electric and Gas Company	<input type="checkbox"/> RTOs, ISOs, RRCs	<input type="checkbox"/> Large Electricity End Users
Telephone	973 - 430 - 5001	<input type="checkbox"/> LSEs	<input type="checkbox"/> Small Electricity Users
E-mail	paul.cafone@pseg.com	<input type="checkbox"/> TDUs	<input type="checkbox"/> <b>Federal, State, and Provincial Regulatory or other Government Entities</b>
		<input type="checkbox"/> Generators	

**Questions 1-7 address the proposed Process for certifying Reliability Authority**

**1. Do you agree that there is a reliability-related need to certify the Reliability Authority function?**

- Yes
- No
- Neutral

Comments: Answering this first question provides to me the opportunity to provide an "overall" comment on this, and the other related SARs that are identified within the NERC Functional Model. The following questions do not provide opportunity to discuss, debate, or provide commentary on the SAR itself. An example is the Reliability Authority Certification Process. In paragraph 5, it states that the Applicant must register in the NERC Master Registry, and Furthermore, Registration stays on hold until Certification is granted. What does this mean? What is the NERC Master Registry? and why is a Registration on Hold ?? What is a Reliability Authority to do? Are they then in Limbo until certified? Who is doing the work now? etc. In Paragraph 10 the Review Team composition can be awful funny if allowed. Why not have a representative from NERC Staff, a representative from another NERC Region, and a Regional Compliance Committee member compose the Review Team, it's allowed. The problem is quite logically these people may not at all be familiar with the amount of work, type of work, the actual work, etc. of the proposed Reliability Authority. Item 12 of the Reliability Authority Certification Process is even more ill defined, e.g, visit the Applicant's Facility. What are the requirements for a Facility? It's Staffing? It's Capability? It's required telemetry?

**2. When there are multiple regions involved, should one region take the lead and make the certification decision or should all involved regions be more actively involved in the interim milestones associated with certification?**

## SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR

---

- One Region should take the lead and make the certification decision.
- All Regions should be actively involved in the interim milestones of certification.

Comments One Region might consider one person on duty acceptable. One Region might think one telephone line is acceptable. What are the basic minimum staffing and Facilities for a Reliability Authority Control Center Facility? Can I do it out of my house?

**3. Who should certify the Reliability Authority function?**

- Region
- NERC
- RTO
- Independent Team

Comments: The RTO which is beholding to the FERC, is the only appropriate certification authority. They are directly involved on a minute to minute basis with the activities of a Reliability Authority. Neither NERC, nor a Region has 24 by 7 personnel on duty.

**The recommended Review Team consists of a minimum of three individuals selected from at least three of the categories listed below:**

- **Interchange Authority**
- **Balancing Authority**
- **Reliability Authority**
- **Transmission Operator**
- **Regional Compliance Committee member**
- **Regional Operating Committee member**
- **Representative of NERC Staff**
- **Representative from another NERC Region**
- **Representative from an RTO, when applicable**

**In the alternative, the Region may elect, with the applicant agreement, to engage a completely independent review team.**

**4. Do we have the appropriate review team members identified?**

- Yes
- No

Comments: Those people who are immediately and directly affected by the activities of the function of the Reliability Authority should provide the personnel for the Review Team. You need the people closest to the Work.

**5. Should a NERC staff person be assigned to each review team?**

- Yes
- No

## SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR

Comments No, this would only result in increased costs to all participants

**6. Have we included anything in the certification process that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

Yes

No

Comments: Much of the material is ill defined and subject to individual interpretation.

**7. Have we missed a step in the certification process that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

Comments: Now we get to the what's NOT there portion. What does NERC staff making modeling changes in the IDC mean? Whoa Big Fella, don't change anything without involving those that will be dramatically affected by the IDC changes. Who is going to settle out the Regional differences found in item 7? The Review Team is too small. There are no minimum requirements for a Interchange Authority Facility or Staff. In item 13, deficiencies are mentioned. Minimum requirements are necessary before one can say that something is deficient.

**Questions 8-13 address the proposed Criteria included in the SAR.**

**8. Which of the following agreements do you think are necessary? (Check all that you feel should apply)**

An agreement defining responsibilities and authority (during normal and emergency conditions) of the Reliability Authority with respect to

Each adjacent Reliability Authority

Each applicable Balancing Authority

Each applicable Interchange Authority

Each applicable Transmission Operator

Each applicable Transmission Service Provider

Comments:

**9. What other agreements should be required for the Reliability Authority?**

Comments:

**10. Who should be required to sign a confidentiality agreement?**

- Reliability Authorities
- Balancing Authorities
- Interchange Authorities
- Transmission Operators
- Transmission Service Providers

Comments:

**11. Have we included anything in the certification criteria that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

- Yes
- No

Comments: see my previous comments

**12. Have we missed anything in the certification criteria that you think is necessary? If yes, please provide details on what you think should be added.**

- Yes
- No

Comments: see my previous comments

**13. If you are aware of any Regional Differences that need to be addressed in this SAR, please highlight them here.**

**SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

---

Regional Difference: Multiple Regional Differences exist, and all must be reviewed.

**14. Other Comments on this Certification SAR:**

Comments: This entire effort is too much too soon. RTOs are still seeking FERC Approval. Regions are in flux as Their Footprint should follow the RTOs. SMD is still not settled. There are simply to many open Issues that must be addressed before a "Standard" for an Reliability Authority can be created.

We have the cart before the Horse.

**Procedures currently exist for re-certification of control areas. Considerations are being given for inclusion of re -certification in the certification standards.**

**15. When should re -certification occur?**

Check all that apply

- Periodic
- Significant change in footprint, corporate organization, or operation
- Repetitive Non-Compliance with Reliability Standards
- Flagrant violation of Reliability Standards

**Comments:**

**SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

<b>SAR Commenter Information</b>		<b>Which Industry Segment do you represent?</b>	
Name	George Bartlett	<input checked="" type="checkbox"/> Trans Owners	<input type="checkbox"/> <b>Brokers, Aggregators, and Marketers</b>
Organization	Entergy Services	<input type="checkbox"/> RTOs, ISOs, RRCs	<input type="checkbox"/> Large Electricity End Users
Telephone	504-310-5801	<input checked="" type="checkbox"/> LSEs	<input type="checkbox"/> Small Electricity Users
E-mail	gbartle@entergy.com	<input type="checkbox"/> TDUs	<input type="checkbox"/> <b>Federal, State, and Provincial Regulatory or other Government Entities</b>
		<input checked="" type="checkbox"/> Generators	

**Questions 1-7 address the proposed Process for certifying Reliability Authority**

**1. Do you agree that there is a reliability-related need to certify the Reliability Authority function?**

Yes  
 No  
 Neutral

Comments:

**2. When there are multiple regions involved, should one region take the lead and make the certification decision or should all involved regions be more actively involved in the interim milestones associated with certification?**

One Region should take the lead and make the certification decision.  
 All Regions should be actively involved in the interim milestones of certification.

Comments

**3. Who should certify the Reliability Authority function?**

- Region
- NERC
- RTO
- Independent Team

Comments:

**The recommended Review Team consists of a minimum of three individuals selected from at least three of the categories listed below:**

- **Interchange Authority**
- **Balancing Authority**
- **Reliability Authority**
- **Transmission Operator**
- **Regional Compliance Committee member**
- **Regional Operating Committee member**
- **Representative of NERC Staff**
- **Representative from another NERC Region**
- **Representative from an RTO, when applicable**

**In the alternative, the Region may elect, with the applicant agreement, to engage a completely independent review team.**

**4. Do we have the appropriate review team members identified?**

- Yes
- No

Comments: Market participants should not be Review Team members. Therefore, Review Teams should have no members that are Interchange Authorities. Any other Team members representing Regions, or Operating Committee, etc, also should not be market participants.

**5. Should a NERC staff person be assigned to each review team?**

- Yes
- No

Comments No, not necessarily.

**SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

---



**6. Have we included anything in the certification process that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

Yes

No

Comments:

**7. Have we missed a step in the certification process that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

Comments:

***Questions 8-13 address the proposed Criteria included in the SAR.***

**8. Which of the following agreements do you think are necessary? (Check all that you feel should apply)**

An agreement defining responsibilities and authority (during normal and emergency conditions) of the Reliability Authority with respect to

Each adjacent Reliability Authority

Each applicable Balancing Authority

Each applicable Interchange Authority

Each applicable Transmission Operator

Each applicable Transmission Service Provider

Comments:

**9. What other agreements should be required for the Reliability Authority?**

Comments: None

**10. Who should be required to sign a confidentiality agreement?**

- Reliability Authorities
- Balancing Authorities
- Interchange Authorities
- Transmission Operators
- Transmission Service Providers

Comments:

**11. Have we included anything in the certification criteria that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

- Yes
- No

Comments:

**12. Have we missed anything in the certification criteria that you think is necessary? If yes, please provide details on what you think should be added.**

- Yes
- No

Comments:

**13. If you are aware of any Regional Differences that need to be addressed in this SAR, please highlight them here.**

Regional Difference:

**14. Other Comments on this Certification SAR:**

Comments:

**Procedures currently exist for re-certification of control areas. Considerations are being given for inclusion of re -certification in the certification standards.**

**15. When should re -certification occur?**

Check all that apply

- Periodic
- Significant change in footprint, corporate organization, or operation
- Repetitive Non-Compliance with Reliability Standards
- Flagrant violation of Reliability Standards

**Comments:** Reliability Authorities should be re-certified on a periodic basis or when flagrant violations of Reliability Standards occur in that reliability region. Re-certification of control areas should be addressed in the Balancing Authority certification, not the Reliability Authority standard.

**SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

<b>SAR Commenter Information</b>	<b>Which Industry Segment do you represent?</b>
Name            Jim Cyrulewski, Vice President, International Transmission Company	<input checked="" type="checkbox"/> Trans Owners <input type="checkbox"/> <b>Brokers, Aggregators, and Marketers</b>
Organization    On behalf of the Michigan Electric Coordinated Systems Control Area	<input type="checkbox"/> RTOs, ISOs, RRCs <input type="checkbox"/> Large Electricity End Users
Telephone        734-665-3628	<input type="checkbox"/> LSEs <input type="checkbox"/> Small Electricity Users
E-mail m                      cyrulewskij@dteenergy.co	<input type="checkbox"/> TDUs <input type="checkbox"/> <b>Federal, State, and Provincial Regulatory or other Government Entities</b>
	<input type="checkbox"/> Generators

**Questions 1-7 address the proposed Process for certifying Reliability Authority**

**1. Do you agree that there is a reliability-related need to certify the Reliability Authority function?**

Yes  
 No  
 Neutral

Comments:

**2. When there are multiple regions involved, should one region take the lead and make the certification decision or should all involved regions be more actively involved in the interim milestones associated with certification?**

One Region should take the lead and make the certification decision.  
 All Regions should be actively involved in the interim milestones of certification.

Comments

**3. Who should certify the Reliability Authority function?**

- Region
- NERC
- RTO
- Independent Team

Comments:

**The recommended Review Team consists of a minimum of three individuals selected from at least three of the categories listed below:**

- **Interchange Authority**
- **Balancing Authority**
- **Reliability Authority**
- **Transmission Operator**
- **Regional Compliance Committee member**
- **Regional Operating Committee member**
- **Representative of NERC Staff**
- **Representative from another NERC Region**
- **Representative from an RTO, when applicable**

**In the alternative, the Region may elect, with the applicant agreement, to engage a completely independent review team.**

**4. Do we have the appropriate review team members identified?**

- Yes
- No

Comments:

**5. Should a NERC staff person be assigned to each review team?**

- Yes
- No

Comments For continuity, NERC Staff should be a mandatory representative on all teams. Also does indicating Yes to this question mean a minimum of 4 individuals must be on a team?



**6. Have we included anything in the certification process that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

Yes

No

Comments:

**7. Have we missed a step in the certification process that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

Comments:

***Questions 8-13 address the proposed Criteria included in the SAR.***

**8. Which of the following agreements do you think are necessary? (Check all that you feel should apply)**

An agreement defining responsibilities and authority (during normal and emergency conditions) of the Reliability Authority with respect to

Each adjacent Reliability Authority

Each applicable Balancing Authority

Each applicable Interchange Authority

Each applicable Transmission Operator

Each applicable Transmission Service Provider

Comments:

**9. What other agreements should be required for the Reliability Authority?**

Comments: Need an agreement with Generation Operation and possibly Generation Owners.

**10. Who should be required to sign a confidentiality agreement?**

- Reliability Authorities
- Balancing Authorities
- Interchange Authorities
- Transmission Operators
- Transmission Service Providers

Comments: Not sure why this question asked. Already covered in BA, IA and TO SARs.

**11. Have we included anything in the certification criteria that you think is unnecessary?  
If yes, please provide details on what you think we should eliminate.**

- Yes
- No

Comments:

**12. Have we missed anything in the certification criteria that you think is necessary? If  
yes, please provide details on what you think should be added.**

- Yes
- No

Comments:

**13. If you are aware of any Regional Differences that need to be addressed in this SAR,  
please highlight them here.**

Regional Difference: None

**14. Other Comments on this Certification SAR:**

Comments: None

**Procedures currently exist for re-certification of control areas. Considerations are being given for inclusion of re -certification in the certification standards.**

**15. When should re -certification occur?**

Check all that apply

- Periodic
- Significant change in footprint, corporate organization, or operation
- Repetitive Non-Compliance with Reliability Standards
- Flagrant violation of Reliability Standards

**Comments:** For second bullet, change in footprint is questionable for recertification. For footprint change, believe this needs to be addressed as new certification.

**SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

---

<b>SAR Commenter Information</b>		<b>Which Industry Segment do you represent?</b>	
Name	Exelon SAR review team. Contact: John Blazekovich	<input checked="" type="checkbox"/> Trans Owners	<input checked="" type="checkbox"/> <b>Brokers, Aggregators, and Marketers</b>
Organization	Exelon	<input type="checkbox"/> RTOs, ISOs, RRCs	<input type="checkbox"/> Large Electricity End Users
Telephone	630-691-4777	<input checked="" type="checkbox"/> LSEs	<input type="checkbox"/> Small Electricity Users
E-mail	john.blazekovich@exeloncorp.com	<input type="checkbox"/> TDUs	<input type="checkbox"/> <b>Federal, State, and Provincial Regulatory or other Government Entities</b>
		<input checked="" type="checkbox"/> Generators	

**Questions 1-7 address the proposed Process for certifying Reliability Authority**

**Exelon comments contained on this SAR (Reliability Authority Certification) apply to the Interchange Authority Certification (IA\_CERTIFICATION\_01\_01), Balancing Authority (BA\_CERTIFICATION\_01\_01), and Transmission Operator Certification (TOP\_CERTIFICATION\_01\_01) SARs.**

**1. Do you agree that there is a reliability-related need to certify the Reliability Authority function?**

Yes  
 No  
 Neutral

Comments: Exelon believes that some form of certification should be required for Reliability Authorities, Interchange Authorities, Balance Authorities and Transmission Operator functions. We do not consider the certification process of functional roles as solely a "core reliability" issue, as such we believe the development of the certification process and criteria should be submitted to the NERC/NAESB JIC process so that the JIC can determine the best entity to define certification criteria.

**2. When there are multiple regions involved, should one region take the lead and make the certification decision or should all involved regions be more actively involved in the interim milestones associated with certification?**

One Region should take the lead and make the certification decision.  
 All Regions should be actively involved in the interim milestones of certification.

Comments: Regional involvement in certification should not be defined until it is determined who is the appropriate group is to perform the certification function. Certification criteria can be developed by a central entity, more discussion may be required in order to determine the appropriate certification agency.

**3. Who should certify the Reliability Authority function?**

- Region
- NERC
- RTO
- Independent Team

Comments: After the certification process and criteria is determined by the appropriate NERC/NAESB process and directed by the NERC NAESB JIC, the question of "who should certify" may become self-evident or may require further industry discussion on the appropriate certification body. We would encourage discussion among the industry (stakeholders) to determine the appropriate certifying agency(s).

**The recommended Review Team consists of a minimum of three individuals selected from at least three of the categories listed below:**

- **Interchange Authority**
- **Balancing Authority**
- **Reliability Authority**
- **Transmission Operator**
- **Regional Compliance Committee member**
- **Regional Operating Committee member**
- **Representative of NERC Staff**
- **Representative from another NERC Region**
- **Representative from an RTO, when applicable**

**In the alternative, the Region may elect, with the applicant agreement, to engage a completely independent review team.**

**4. Do we have the appropriate review team members identified?**

- Yes
- No

## SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR

Comments: Cannot be determined at this point. In order to determine the proper certification agency, industry stakeholders should consider independence, credibility, and efficiency in choosing the appropriate certification body.

**5. Should a NERC staff person be assigned to each review team?**

Yes

No

Comments Cannot be determined at this point.

**6. Have we included anything in the certification process that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

Yes

No

Comments: Because Exelon does not see this issue solely as a "core reliability" issue and believe the certification criteria and process should be defined by the appropriate NERC and or NAESB process. We believe it is premature for NERC to define the process at this time.

**7. Have we missed a step in the certification process that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

Comments: Because Exelon does not see this issue solely as a "core reliability" issue and believe the certification criteria and process should be defined by the appropriate NERC and or NAESB process. We believe it is premature for NERC to define the process at this time.

**Questions 8-13 address the proposed Criteria included in the SAR.**

**8. Which of the following agreements do you think are necessary? (Check all that you feel should apply)**

An agreement defining responsibilities and authority (during normal and emergency conditions) of the Reliability Authority with respect to

Each adjacent Reliability Authority

**SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

---

- Each applicable Balancing Authority
- Each applicable Interchange Authority
- Each applicable Transmission Operator
- Each applicable Transmission Service Provider

Comments:

**9. What other agreements should be required for the Reliability Authority?**

Comments:

**10. Who should be required to sign a confidentiality agreement?**

- Reliability Authorities
- Balancing Authorities
- Interchange Authorities
- Transmission Operators
- Transmission Service Providers

Comments:

**11. Have we included anything in the certification criteria that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

- Yes
- No

Comments: Because Exelon does not see this issue solely as a "core reliability" issue and believe the certification criteria and process should be defined by the appropriate NERC and or NAESB process. We believe it is premature for NERC to define the process at this time.

**12. Have we missed anything in the certification criteria that you think is necessary? If yes, please provide details on what you think should be added.**

- Yes

## SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR

No

Comments: Because Exelon does not see this issue solely as a "core reliability" issue and believe the certification criteria and process should be defined by the appropriate NERC and or NAESB process. We believe it is premature for NERC to define the process at this time.

### 13. If you are aware of any Regional Differences that need to be addressed in this SAR, please highlight them here.

Regional Difference: Issues as a result of Regional differences can be decided through the NERC/NAESB process.

### 14. Other Comments on this Certification SAR:

Comments: Exelon feels that the series of "certification" SARs should be submitted to the NERC/NAESB JIC process.

Once in the NERC/NAESB JIC process, we ask that the issue of overlapping responsibilities (as defined in the NERC Functional Model) among balancing authorities, interchange authorities, transmission owners and RTOs be addressed.

### Procedures currently exist for re-certification of control areas. Considerations are being given for inclusion of re-certification in the certification standards.

#### 15. When should re-certification occur?

Check all that apply

- Periodic
- Significant change in footprint, corporate organization, or operation
- Repetitive Non-Compliance with Reliability Standards
- Flagrant violation of Reliability Standards

**Comments:** Because Exelon does not see this issue solely as a "core reliability" issue and believe the certification criteria and process should be defined by the appropriate NERC and or NAESB process. We believe it is premature for NERC to define the process at this time.

**SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

<b>SAR Commenter Information</b>		<b>Which Industry Segment do you represent?</b>	
Name	William F Pope	<input type="checkbox"/> Trans Owners	<input type="checkbox"/> <b>Brokers, Aggregators, and Marketers</b>
Organization	Gulf Power Company	<input type="checkbox"/> RTOs, ISOs, RRCs	<input type="checkbox"/> Large Electricity End Users
Telephone	850-444-6449	<input checked="" type="checkbox"/> LSEs	<input type="checkbox"/> Small Electricity Users
E-mail	wfpope@southernco.com	<input type="checkbox"/> TDUs	<input type="checkbox"/> <b>Federal, State, and Provincial Regulatory or other Government Entities</b>
		<input type="checkbox"/> Generators	

**Questions 1-7 address the proposed Process for certifying Reliability Authority**

**1. Do you agree that there is a reliability-related need to certify the Reliability Authority function?**

Yes  
 No  
 Neutral

Comments:

**2. When there are multiple regions involved, should one region take the lead and make the certification decision or should all involved regions be more actively involved in the interim milestones associated with certification?**

One Region should take the lead and make the certification decision.  
 All Regions should be actively involved in the interim milestones of certification.

Comments

**3. Who should certify the Reliability Authority function?**

- Region
- NERC
- RTO
- Independent Team

Comments:

**The recommended Review Team consists of a minimum of three individuals selected from at least three of the categories listed below:**

- **Interchange Authority**
- **Balancing Authority**
- **Reliability Authority**
- **Transmission Operator**
- **Regional Compliance Committee member**
- **Regional Operating Committee member**
- **Representative of NERC Staff**
- **Representative from another NERC Region**
- **Representative from an RTO, when applicable**

**In the alternative, the Region may elect, with the applicant agreement, to engage a completely independent review team.**

**4. Do we have the appropriate review team members identified?**

- Yes
- No

Comments:

**5. Should a NERC staff person be assigned to each review team?**

- Yes
- No

Comments

**6. Have we included anything in the certification process that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

Yes

No

Comments:

**7. Have we missed a step in the certification process that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

Comments:

***Questions 8-13 address the proposed Criteria included in the SAR.***

**8. Which of the following agreements do you think are necessary? (Check all that you feel should apply)**

An agreement defining responsibilities and authority (during normal and emergency conditions) of the Reliability Authority with respect to

Each adjacent Reliability Authority

Each applicable Balancing Authority

Each applicable Interchange Authority

Each applicable Transmission Operator

Each applicable Transmission Service Provider

Comments:

**9. What other agreements should be required for the Reliability Authority?**

Comments:

**10. Who should be required to sign a confidentiality agreement?**

- Reliability Authorities
- Balancing Authorities
- Interchange Authorities
- Transmission Operators
- Transmission Service Providers

Comments:

**11. Have we included anything in the certification criteria that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

- Yes
- No

Comments:

**12. Have we missed anything in the certification criteria that you think is necessary? If yes, please provide details on what you think should be added.**

- Yes
- No

Comments:

**13. If you are aware of any Regional Differences that need to be addressed in this SAR, please highlight them here.**

Regional Difference:

**14. Other Comments on this Certification SAR:**

Comments:

**Procedures currently exist for re-certification of control areas. Considerations are being given for inclusion of re -certification in the certification standards.**

**15. When should re -certification occur?**

Check all that apply

- Periodic
- Significant change in footprint, corporate organization, or operation
- Repetitive Non-Compliance with Reliability Standards
- Flagrant violation of Reliability Standards

**Comments:**

## SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR

SAR Commenter Information		Which Industry Segment do you represent?	
Name	William J. Smith	<input checked="" type="checkbox"/> Trans Owners	<input type="checkbox"/> Brokers, Aggregators, and Marketers
Organization	Allegheny Power	<input type="checkbox"/> RTOs, ISOs, RRCs	<input type="checkbox"/> Large Electricity End Users
Telephone	(724) 838-6552	<input type="checkbox"/> LSEs	<input type="checkbox"/> Small Electricity Users
E-mail com	wsmith1@alleghenypower.	<input type="checkbox"/> TDUs	<input type="checkbox"/> Federal, State, and Provincial Regulatory or other Government Entities
		<input type="checkbox"/> Generators	

**Questions 1-7 address the proposed Process for certifying Reliability Authority**

**1. Do you agree that there is a reliability-related need to certify the Reliability Authority function?**

- Yes  
 No  
 Neutral

Comments:

**2. When there are multiple regions involved, should one region take the lead and make the certification decision or should all involved regions be more actively involved in the interim milestones associated with certification?**

- One Region should take the lead and make the certification decision.  
 All Regions should be actively involved in the interim milestones of certification.

Comments

**3. Who should certify the Reliability Authority function?**

- Region
- NERC
- RTO
- Independent Team

Comments:

**The recommended Review Team consists of a minimum of three individuals selected from at least three of the categories listed below:**

- **Interchange Authority**
- **Balancing Authority**
- **Reliability Authority**
- **Transmission Operator**
- **Regional Compliance Committee member**
- **Regional Operating Committee member**
- **Representative of NERC Staff**
- **Representative from another NERC Region**
- **Representative from an RTO, when applicable**

**In the alternative, the Region may elect, with the applicant agreement, to engage a completely independent review team.**

**4. Do we have the appropriate review team members identified?**

- Yes
- No

Comments: Minimum credentials should be established for the selection of Review Team Members.

**5. Should a NERC staff person be assigned to each review team?**

- Yes
- No

Comments NERC Staff should review the certification decision for consistency.



**6. Have we included anything in the certification process that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

Yes

No

Comments:

**7. Have we missed a step in the certification process that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

Comments:

***Questions 8-13 address the proposed Criteria included in the SAR.***

**8. Which of the following agreements do you think are necessary? (Check all that you feel should apply)**

An agreement defining responsibilities and authority (during normal and emergency conditions) of the Reliability Authority with respect to

Each adjacent Reliability Authority

Each applicable Balancing Authority

Each applicable Interchange Authority

Each applicable Transmission Operator

Each applicable Transmission Service Provider

Comments:

**9. What other agreements should be required for the Reliability Authority?**

Comments:

**10. Who should be required to sign a confidentiality agreement?**

- Reliability Authorities
- Balancing Authorities
- Interchange Authorities
- Transmission Operators
- Transmission Service Providers

Comments:

**11. Have we included anything in the certification criteria that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

- Yes
- No

Comments:

**12. Have we missed anything in the certification criteria that you think is necessary? If yes, please provide details on what you think should be added.**

- Yes
- No

Comments:

**13. If you are aware of any Regional Differences that need to be addressed in this SAR, please highlight them here.**

Regional Difference:

**14. Other Comments on this Certification SAR:**

Comments: In order to promote consistency throughout NERC, the Review Team should use a NERC Standardized "evaluation review template".

**Procedures currently exist for re-certification of control areas. Considerations are being given for inclusion of re -certification in the certification standards.**

**15. When should re -certification occur?**

Check all that apply

- Periodic
- Significant change in footprint, corporate organization, or operation
- Repetitive Non-Compliance with Reliability Standards
- Flagrant violation of Reliability Standards

**Comments:**

**SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

<b>SAR Commenter Information</b>		<b>Which Industry Segment do you represent?</b>	
Name	Barry Gee	<input checked="" type="checkbox"/> Trans Owners	<input type="checkbox"/> <b>Brokers, Aggregators, and Marketers</b>
Organization	National Grid	<input type="checkbox"/> RTOs, ISOs, RRCs	<input type="checkbox"/> Large Electricity End Users
Telephone	508 389 3335	<input type="checkbox"/> LSEs	<input type="checkbox"/> Small Electricity Users
E-mail	barry.gee@us.ngrid.com	<input type="checkbox"/> TDUs	<input type="checkbox"/> <b>Federal, State, and Provincial Regulatory or other Government Entities</b>
		<input type="checkbox"/> Generators	

**Questions 1-7 address the proposed Process for certifying Reliability Authority**

**1. Do you agree that there is a reliability-related need to certify the Reliability Authority function?**

Yes  
 No  
 Neutral

Comments:

**2. When there are multiple regions involved, should one region take the lead and make the certification decision or should all involved regions be more actively involved in the interim milestones associated with certification?**

One Region should take the lead and make the certification decision.  
 All Regions should be actively involved in the interim milestones of certification.

Comments

**3. Who should certify the Reliability Authority function?**

- Region
- NERC
- RTO
- Independent Team

Comments:

**The recommended Review Team consists of a minimum of three individuals selected from at least three of the categories listed below:**

- **Interchange Authority**
- **Balancing Authority**
- **Reliability Authority**
- **Transmission Operator**
- **Regional Compliance Committee member**
- **Regional Operating Committee member**
- **Representative of NERC Staff**
- **Representative from another NERC Region**
- **Representative from an RTO, when applicable**

**In the alternative, the Region may elect, with the applicant agreement, to engage a completely independent review team.**

**4. Do we have the appropriate review team members identified?**

- Yes
- No

Comments: If this question refers to categories yes-the categories are appropriate. National Grid also recommends that the individuals selected have broad, system wide operating system experience. NERC staff, while listed as a category, should not be a voting member.

National Grid feels there should be a minimum of one representative from each of the four categories, IA,RA,BA, and TO.

**5. Should a NERC staff person be assigned to each review team?**

Yes

No

Comments Possibly when the RA spans more than one Region, and as a non-voting facilitator.

**6. Have we included anything in the certification process that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

Yes

No

Comments:

**7. Have we missed a step in the certification process that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

Comments:

***Questions 8-13 address the proposed Criteria included in the SAR.***

**8. Which of the following agreements do you think are necessary? (Check all that you feel should apply)**

An agreement defining responsibilities and authority (during normal and emergency conditions) of the Reliability Authority with respect to

Each adjacent Reliability Authority

Each applicable Balancing Authority

Each applicable Interchange Authority

Each applicable Transmission Operator

Each applicable Transmission Service Provider

Comments:

**9. What other agreements should be required for the Reliability Authority?**

Comments:

**10. Who should be required to sign a confidentiality agreement?**

- Reliability Authorities
- Balancing Authorities
- Interchange Authorities
- Transmission Operators
- Transmission Service Providers

Comments:

**11. Have we included anything in the certification criteria that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

- Yes
- No

Comments:

**12. Have we missed anything in the certification criteria that you think is necessary? If yes, please provide details on what you think should be added.**

- Yes
- No

Comments: The SAR should provide flexibility for information routing to fully integrate the TO in the process.

**13. If you are aware of any Regional Differences that need to be addressed in this SAR, please highlight them here.**

Regional Difference:

**14. Other Comments on this Certification SAR:**

Comments: Coordination between the existing Reliability Coordinator(s) and the new RA(s) needs to be understood and considered during the development of the RA standard.

**Procedures currently exist for re-certification of control areas. Considerations are being given for inclusion of re -certification in the certification standards.**

**15. When should re -certification occur?**

Check all that apply

- Periodic
- Significant change in footprint, corporate organization, or operation
- Repetitive Non-Compliance with Reliability Standards
- Flagrant violation of Reliability Standards

**Comments:**

**SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

<b>SAR Commenter Information</b>		<b>Which Industry Segment do you represent?</b>	
Name	David Little	<input checked="" type="checkbox"/> Trans Owners	<input type="checkbox"/> <b>Brokers, Aggregators, and Marketers</b>
Organization	Nova Scotia Power Inc	<input type="checkbox"/> RTOs, ISOs, RRCs	<input type="checkbox"/> Large Electricity End Users
Telephone	902 428 7708	<input checked="" type="checkbox"/> LSEs	<input type="checkbox"/> Small Electricity Users
E-mail	david.little@nspower.ca	<input type="checkbox"/> TDUs	<input type="checkbox"/> <b>Federal, State, and Provincial Regulatory or other Government Entities</b>
		<input checked="" type="checkbox"/> Generators	

**Questions 1-7 address the proposed Process for certifying Reliability Authority**

**1. Do you agree that there is a reliability-related need to certify the Reliability Authority function?**

Yes  
 No  
 Neutral

Comments:

**2. When there are multiple regions involved, should one region take the lead and make the certification decision or should all involved regions be more actively involved in the interim milestones associated with certification?**

One Region should take the lead and make the certification decision.  
 All Regions should be actively involved in the interim milestones of certification.

Comments

**3. Who should certify the Reliability Authority function?**

- Region
- NERC
- RTO
- Independent Team

Comments:

**The recommended Review Team consists of a minimum of three individuals selected from at least three of the categories listed below:**

- **Interchange Authority**
- **Balancing Authority**
- **Reliability Authority**
- **Transmission Operator**
- **Regional Compliance Committee member**
- **Regional Operating Committee member**
- **Representative of NERC Staff**
- **Representative from another NERC Region**
- **Representative from an RTO, when applicable**

**In the alternative, the Region may elect, with the applicant agreement, to engage a completely independent review team.**

**4. Do we have the appropriate review team members identified?**

- Yes
- No

Comments: If this question refers to categories yes-the categories are appropriate. NPCC also recommends that the individuals selected have broad, system wide operating system experience. NERC staff, while listed as a category, should not be a voting member.

NPCC feels there should be a minimum of one representative from each of the four categories, IA,RA,BA, and TO.

**5. Should a NERC staff person be assigned to each review team?**

Yes

No

Comments Possibly when the RA spans more than one Region, and as a non-voting facilitator.

**6. Have we included anything in the certification process that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

Yes

No

Comments:

**7. Have we missed a step in the certification process that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

Comments:

***Questions 8-13 address the proposed Criteria included in the SAR.***

**8. Which of the following agreements do you think are necessary? (Check all that you feel should apply)**

An agreement defining responsibilities and authority (during normal and emergency conditions) of the Reliability Authority with respect to

Each adjacent Reliability Authority

Each applicable Balancing Authority

Each applicable Interchange Authority

Each applicable Transmission Operator

Each applicable Transmission Service Provider

Comments:

**9. What other agreements should be required for the Reliability Authority?**

Comments:

**10. Who should be required to sign a confidentiality agreement?**

- Reliability Authorities
- Balancing Authorities
- Interchange Authorities
- Transmission Operators
- Transmission Service Providers

Comments:

**11. Have we included anything in the certification criteria that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

- Yes
- No

Comments:

**12. Have we missed anything in the certification criteria that you think is necessary? If yes, please provide details on what you think should be added.**

- Yes
- No

Comments: The SAR should provide flexibility for information routing to fully integrate the TO in the process.

**13. If you are aware of any Regional Differences that need to be addressed in this SAR, please highlight them here.**

Regional Difference:

**14. Other Comments on this Certification SAR:**

Comments: Coordination between the existing Reliability Coordinator(s) and the new RA(s) needs to be understood and considered during the development of the RA standard.

**Procedures currently exist for re-certification of control areas. Considerations are being given for inclusion of re -certification in the certification standards.**

**15. When should re -certification occur?**

Check all that apply

- Periodic
- Significant change in footprint, corporate organization, or operation
- Repetitive Non-Compliance with Reliability Standards
- Flagrant violation of Reliability Standards

**Comments:**

## SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR

SAR Commenter Information		Which Industry Segment do you represent?	
Name	Paul Elwing	<input type="checkbox"/> Trans Owners	<input type="checkbox"/> Brokers, Aggregators, and Marketers
Organization	Lakeland Electric	<input type="checkbox"/> RTOs, ISOs, RRCs	<input type="checkbox"/> Large Electricity End Users
Telephone	863-834-6531	<input checked="" type="checkbox"/> LSEs	<input type="checkbox"/> Small Electricity Users
E-mail net	paul.elwing@lakelandgov.	<input type="checkbox"/> TDUs	<input type="checkbox"/> Federal, State, and Provincial Regulatory or other Government Entities
		<input type="checkbox"/> Generators	

**Questions 1-7 address the proposed Process for certifying Reliability Authority**

**1. Do you agree that there is a reliability-related need to certify the Reliability Authority function?**

- Yes  
 No  
 Neutral

Comments: This SAR should be put on hold until the Functional Model Task Group completes work on building/defining all aspects of the NERC Functional Model.

**2. When there are multiple regions involved, should one region take the lead and make the certification decision or should all involved regions be more actively involved in the interim milestones associated with certification?**

- One Region should take the lead and make the certification decision.  
 All Regions should be actively involved in the interim milestones of certification.

Comments

**3. Who should certify the Reliability Authority function?**

- Region
- NERC
- RTO
- Independent Team

Comments:

**The recommended Review Team consists of a minimum of three individuals selected from at least three of the categories listed below:**

- **Interchange Authority**
- **Balancing Authority**
- **Reliability Authority**
- **Transmission Operator**
- **Regional Compliance Committee member**
- **Regional Operating Committee member**
- **Representative of NERC Staff**
- **Representative from another NERC Region**
- **Representative from an RTO, when applicable**

**In the alternative, the Region may elect, with the applicant agreement, to engage a completely independent review team.**

**4. Do we have the appropriate review team members identified?**

- Yes
- No

Comments: Representative from Regional Reliability Council should be included

**5. Should a NERC staff person be assigned to each review team?**

- Yes
- No

Comments Only as an ad-hoc member, no voting authority

**6. Have we included anything in the certification process that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

Yes

No

Comments: Certification Process should be separate and stand-alone, not included in the SAR

**7. Have we missed a step in the certification process that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

Comments: Certification Process should be reviewed separately in open forum as SAR's are

***Questions 8-13 address the proposed Criteria included in the SAR.***

**8. Which of the following agreements do you think are necessary? (Check all that you feel should apply)**

An agreement defining responsibilities and authority (during normal and emergency conditions) of the Reliability Authority with respect to

Each adjacent Reliability Authority

Each applicable Balancing Authority

Each applicable Interchange Authority

Each applicable Transmission Operator

Each applicable Transmission Service Provider

Comments: Regional Security Process/Reliability Plans should identify responsibilities & authorities of each function regarding reliability, individual agreements inefficient/redundant.

**9. What other agreements should be required for the Reliability Authority?**

Comments:

**10. Who should be required to sign a confidentiality agreement?**

- Reliability Authorities
- Balancing Authorities
- Interchange Authorities
- Transmission Operators
- Transmission Service Providers

Comments: Entities handling commercially sensitive information

**11. Have we included anything in the certification criteria that you think is unnecessary?  
If yes, please provide details on what you think we should eliminate.**

- Yes
- No

Comments:

**12. Have we missed anything in the certification criteria that you think is necessary? If  
yes, please provide details on what you think should be added.**

- Yes
- No

Comments: Definition of RA is insufficient

**13. If you are aware of any Regional Differences that need to be addressed in this SAR,  
please highlight them here.**

Regional Difference: SAR should only step in in the absence of Regional Security Process / Reliability Plan. Should also be flexible enough so as not to conflict with State jurisdictional requirements

**14. Other Comments on this Certification SAR:**

Comments: SAR should be put on hold until Functional Model completed & Certification Processes should not be included in the SAR

**Procedures currently exist for re-certification of control areas. Considerations are being given for inclusion of re -certification in the certification standards.**

**15. When should re -certification occur?**

Check all that apply

- Periodic
- Significant change in footprint, corporate organization, or operation
- Repetitive Non-Compliance with Reliability Standards
- Flagrant violation of Reliability Standards

**Comments:**

**SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

<b>SAR Commenter Information</b>	<b>Which Industry Segment do you represent?</b>
Name           A. Ralph Rufrano	<input checked="" type="checkbox"/> Trans Owners <input type="checkbox"/> <b>Brokers, Aggregators, and Marketers</b>
Organization    NYPA	<input type="checkbox"/> RTOs, ISOs, RRCs <input type="checkbox"/> Large Electricity End Users
Telephone       914-681-6265	<input type="checkbox"/> LSEs <input type="checkbox"/> Small Electricity Users
E-mail           rufrano.r@nypa.gov	<input type="checkbox"/> TDUs <input type="checkbox"/> <b>Federal, State, and Provincial Regulatory or other Government Entities</b>
	<input type="checkbox"/> Generators

**Questions 1-7 address the proposed Process for certifying Reliability Authority**

**1. Do you agree that there is a reliability-related need to certify the Reliability Authority function?**

Yes  
 No  
 Neutral

Comments:

**2. When there are multiple regions involved, should one region take the lead and make the certification decision or should all involved regions be more actively involved in the interim milestones associated with certification?**

One Region should take the lead and make the certification decision.  
 All Regions should be actively involved in the interim milestones of certification.

Comments

**3. Who should certify the Reliability Authority function?**

- Region
- NERC
- RTO
- Independent Team

Comments:

**The recommended Review Team consists of a minimum of three individuals selected from at least three of the categories listed below:**

- **Interchange Authority**
- **Balancing Authority**
- **Reliability Authority**
- **Transmission Operator**
- **Regional Compliance Committee member**
- **Regional Operating Committee member**
- **Representative of NERC Staff**
- **Representative from another NERC Region**
- **Representative from an RTO, when applicable**

**In the alternative, the Region may elect, with the applicant agreement, to engage a completely independent review team.**

**4. Do we have the appropriate review team members identified?**

- Yes
- No

Comments: If this question refers to categories yes-the categories are appropriate. NYPA, as does NPCC, also recommends that the individuals selected have broad, system wide operating system experience. NERC staff, while listed as a category, should not be a voting member.

NYPA, as does NPCC, feels there should be a minimum of one representative from each of the four categories, IA,RA,BA, and TO.

**SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

---

**5. Should a NERC staff person be assigned to each review team?**

Yes

No

Comments Possibly when the RA spans more than one Region, and as a non-voting facilitator.

**6. Have we included anything in the certification process that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

Yes

No

Comments:

**7. Have we missed a step in the certification process that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

Comments:

***Questions 8-13 address the proposed Criteria included in the SAR.***

**8. Which of the following agreements do you think are necessary? (Check all that you feel should apply)**

An agreement defining responsibilities and authority (during normal and emergency conditions) of the Reliability Authority with respect to

Each adjacent Reliability Authority

Each applicable Balancing Authority

Each applicable Interchange Authority

Each applicable Transmission Operator

Each applicable Transmission Service Provider

Comments:

**9. What other agreements should be required for the Reliability Authority?**

Comments:

**10. Who should be required to sign a confidentiality agreement?**

- Reliability Authorities
- Balancing Authorities
- Interchange Authorities
- Transmission Operators
- Transmission Service Providers

Comments:

**11. Have we included anything in the certification criteria that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

- Yes
- No

Comments:

**12. Have we missed anything in the certification criteria that you think is necessary? If yes, please provide details on what you think should be added.**

- Yes
- No

Comments: The SAR should provide flexibility for information routing to fully integrate the TO in the process.

**13. If you are aware of any Regional Differences that need to be addressed in this SAR, please highlight them here.**

Regional Difference:

**14. Other Comments on this Certification SAR:**

Comments: Coordination between the existing Reliability Coordinator(s) and the new RA(s) needs to be understood and considered during the development of the RA standard.

**Procedures currently exist for re-certification of control areas. Considerations are being given for inclusion of re -certification in the certification standards.**

**15. When should re -certification occur?**

Check all that apply

- Periodic
- Significant change in footprint, corporate organization, or operation
- Repetitive Non-Compliance with Reliability Standards
- Flagrant violation of Reliability Standards

**Comments:**

**SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

<b>SAR Commenter Information</b>	<b>Which Industry Segment do you represent?</b>
Name MIPS and LTIS	<input type="checkbox"/> Trans Owners <input type="checkbox"/> <b>Brokers, Aggregators, and Marketers</b>
Organization MIPS and LTIS	<input type="checkbox"/> RTOs, ISOs, RRCs <input type="checkbox"/> Large Electricity End Users
Telephone	<input type="checkbox"/> LSEs <input type="checkbox"/> Small Electricity Users
E-mail mips@nerc.com ltis@nerc.com	<input type="checkbox"/> TDUs <input type="checkbox"/> <b>Federal, State, and Provincial Regulatory or other Government Entities</b>
	<input type="checkbox"/> Generators

**Questions 1-7 address the proposed Process for certifying Reliability Authority**

**1. Do you agree that there is a reliability-related need to certify the Reliability Authority function?**

- Yes
- No
- Neutral

Comments: unanimous, and would like to have included clarification on how the area of a Reliability Authority would be defined

**2. When there are multiple regions involved, should one region take the lead and make the certification decision or should all involved regions be more actively involved in the interim milestones associated with certification?**

- One Region should take the lead and make the certification decision.
- All Regions should be actively involved in the interim milestones of certification.

Comments Are you asking whether RA areas should be constrained by Regional boundaries? If more than one Region were to be involved in the RA certification, what process would be used if some Regions approved the certification and some declined? Please refer to the answer to question #3 below.

**3. Who should certify the Reliability Authority function?**

- Region
- NERC
- RTO
- Independent Team

Comments: NERC should be the organization that certifies RA's. This removes a problem of conflicting regional requirements. MIPS and LTIS identified two scenarios:

1) NERC may elect to delegate that responsibility to a Regional Council in those cases where the area of the RA is contained entirely in one Region, and

2) In cases where the RA crosses regional boundaries, NERC should establish a balanced, cross-regional panel that would conduct a single certification process.

Additionally, the MIPS believes that there should be a separate SAR/Standard that would establish a process for conducting all certification activities.

**The recommended Review Team consists of a minimum of three individuals selected from at least three of the categories listed below:**

- **Interchange Authority**
- **Balancing Authority**
- **Reliability Authority**
- **Transmission Operator**
- **Regional Compliance Committee member**
- **Regional Operating Committee member**
- **Representative of NERC Staff**
- **Representative from another NERC Region**
- **Representative from an RTO, when applicable**

**In the alternative, the Region may elect, with the applicant agreement, to engage a completely independent review team.**

**4. Do we have the appropriate review team members identified?**

- Yes
- No

Comments: This question appears to assume the answer to the previous question has already been determined that the Region conducts the certification. Please see answer above.

Any list should also require that those members of the certification team be knowledgeable in the relevant functions that would be performed by the RA requesting certification, and at least one member of the team should be NERC certified as a RA. The certification process should clearly explain what would constitute consensus. The Review Team must be composed of representatives of members from each applicable type of Authority and Function that is immediately and directly effected by the activities and function of the Reliability Authority.

**5. Should a NERC staff person be assigned to each review team?**

Yes

No

Comments The staff person should be from the NERC Compliance department and be familiar with the certification process and the requirements of the RA function. The purpose would be to ensure that a consistent methodology is applied to the certification process, and the NERC staff person would not directly participate or have a vote in the certification process.

**6. Have we included anything in the certification process that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

Yes

No

Comments: The process outlined in the SAR presumes that the Region would be responsible initiating the certification. The MIPS believes that NERC should be responsible for conducting the certification process.

To avoid the appearance of a conflict of interest, the opportunity of the applicant to approve review team members should be removed. (e.g. step 9)

The process assumes that the IDC continues to exist; consequently, step 6 should be removed from the certification process.

**7. Have we missed a step in the certification process that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

Comments: There is not a provision for review of certification by organizations that would be subordinate to the RA. In step 7 of the certification process, the questionnaire should be sent to all members of the authorities and functions affected. Notification of the certification should be posted to the industry at-large and an opportunity should be made available for submission of comments prior to completion of the certification process.

**Questions 8-13 address the proposed Criteria included in the SAR.**

**8. Which of the following agreements do you think are necessary? (Check all that you feel should apply)**

An agreement defining responsibilities and authority (during normal and emergency conditions) of the Reliability Authority with respect to

- Each adjacent Reliability Authority
- Each applicable Balancing Authority
- Each applicable Interchange Authority
- Each applicable Transmission Operator
- Each applicable Transmission Service Provider

Comments: Specific, standardized agreements should not be required; rather there should be a finding that adequate arrangements are in place that would let the prospective RA carry out the responsibilities of a RA.

**9. What other agreements should be required for the Reliability Authority?**

Comments: Specific, standardized agreements should not be required; rather there should be a finding that adequate arrangements are in place that would let the prospective RA carry out the responsibilities of a RA.

**10. Who should be required to sign a confidentiality agreement?**

- Reliability Authorities
- Balancing Authorities
- Interchange Authorities
- Transmission Operators
- Transmission Service Providers

Comments: The certification process should not require the signing of a confidentiality agreement. Subsequent access to confidential operational data would be subject to the signing of a confidentiality agreement. To the extent that the confidential information is NERC related, the agreement should be a "NERC" confidentiality agreement.

Relative to certifying RA's, the status of the other groups' signing is irrelevant. This question is

## SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR

---

beyond the scope of RA certification by asking about organizations other than the RA.

**11. Have we included anything in the certification criteria that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

Yes

No

Comments: If this is an initial certification for an RA, there may be reluctance of other entities to sign final agreements until the RA is actually certified. See #8 for further clarification.

The certification criteria that would be contained in the standard should be more specific.

References to entities in the Functional Model diagrams should be replaced with verb-oriented names that more clearly delineate that the Functional Model does not specify organizational structure.

**12. Have we missed anything in the certification criteria that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

Comments: There should be a statement that clearly states that the RA applicant can comply with all applicable NERC standards.

There is no description of the circumstances under which a RA would be decertified.

**13. If you are aware of any Regional Differences that need to be addressed in this SAR, please highlight them here.**

Regional Difference: n/a

**14. Other Comments on this Certification SAR:**

Comments: Throughout the text the SAR and comment form implies the the Region has authority for conducting the certification process, up to and including dispute resolution. This conflicts with your question asking who should conduct the certification.

**Procedures currently exist for re-certification of control areas. Considerations are being given for inclusion of re -certification in the certification standards.**

**15. When should re -certification occur?**

Check all that apply

- Periodic
- Significant change in footprint, corporate organization, or operation
- Repetitive Non-Compliance with Reliability Standards
- Flagrant violation of Reliability Standards

**Comments:** Recertification due to repetitive and/or flagrant non-compliance should only be initiated upon decertification by the Compliance and Monitoring Program.

**SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

<b>SAR Commenter Information</b>	<b>Which Industry Segment do you represent?</b>
Name            Ray Morella	<input checked="" type="checkbox"/> Trans Owners <input type="checkbox"/> <b>Brokers, Aggregators, and Marketers</b>
Organization    FirstEnergy Corp	<input type="checkbox"/> RTOs, ISOs, RRCs <input type="checkbox"/> Large Electricity End Users
Telephone        330.336.9831	<input type="checkbox"/> LSEs <input type="checkbox"/> Small Electricity Users
E-mail om                      morellar@firstenergycorp.c	<input type="checkbox"/> TDUs <input type="checkbox"/> <b>Federal, State, and Provincial Regulatory or other Government Entities</b>
	<input type="checkbox"/> Generators

**Questions 1-7 address the proposed Process for certifying Reliability Authority**

**1. Do you agree that there is a reliability-related need to certify the Reliability Authority function?**

Yes  
 No  
 Neutral

Comments:

**2. When there are multiple regions involved, should one region take the lead and make the certification decision or should all involved regions be more actively involved in the interim milestones associated with certification?**

One Region should take the lead and make the certification decision.  
 All Regions should be actively involved in the interim milestones of certification.

Comments All appropriate regions should be equal participants. This will insure consistency and awareness in potential regional differences

**3. Who should certify the Reliability Authority function?**

- Region
- NERC
- RTO
- Independent Team

Comments:

**The recommended Review Team consists of a minimum of three individuals selected from at least three of the categories listed below:**

- **Interchange Authority**
- **Balancing Authority**
- **Reliability Authority**
- **Transmission Operator**
- **Regional Compliance Committee member**
- **Regional Operating Committee member**
- **Representative of NERC Staff**
- **Representative from another NERC Region**
- **Representative from an RTO, when applicable**

**In the alternative, the Region may elect, with the applicant agreement, to engage a completely independent review team.**

**4. Do we have the appropriate review team members identified?**

- Yes
- No

Comments:

**5. Should a NERC staff person be assigned to each review team?**

- Yes
- No

Comments

**6. Have we included anything in the certification process that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

Yes

No

Comments:

**7. Have we missed a step in the certification process that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

Comments:

***Questions 8-13 address the proposed Criteria included in the SAR.***

**8. Which of the following agreements do you think are necessary? (Check all that you feel should apply)**

An agreement defining responsibilities and authority (during normal and emergency conditions) of the Reliability Authority with respect to

Each adjacent Reliability Authority

Each applicable Balancing Authority

Each applicable Interchange Authority

Each applicable Transmission Operator

Each applicable Transmission Service Provider

Comments:

**9. What other agreements should be required for the Reliability Authority?**

Comments:

**10. Who should be required to sign a confidentiality agreement?**

- Reliability Authorities
- Balancing Authorities
- Interchange Authorities
- Transmission Operators
- Transmission Service Providers

Comments:

**11. Have we included anything in the certification criteria that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

- Yes
- No

Comments:

**12. Have we missed anything in the certification criteria that you think is necessary? If yes, please provide details on what you think should be added.**

- Yes
- No

Comments:

**13. If you are aware of any Regional Differences that need to be addressed in this SAR, please highlight them here.**

Regional Difference:

**14. Other Comments on this Certification SAR:**

Comments:

**Procedures currently exist for re-certification of control areas. Considerations are being given for inclusion of re -certification in the certification standards.**

**15. When should re -certification occur?**

Check all that apply

- Periodic
- Significant change in footprint, corporate organization, or operation
- Repetitive Non-Compliance with Reliability Standards
- Flagrant violation of Reliability Standards

**Comments:**

**SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

<b>SAR Commenter Information</b>	<b>Which Industry Segment do you represent?</b>
Name            Guy V. Zito	<input type="checkbox"/> Trans Owners <input type="checkbox"/> <b>Brokers, Aggregators, and Marketers</b>
Organization    NPCC	<input checked="" type="checkbox"/> RTOs, ISOs, RRCs <input type="checkbox"/> Large Electricity End Users
Telephone       212-840-1070	<input type="checkbox"/> LSEs <input type="checkbox"/> Small Electricity Users
E-mail            gzito@npcc.org	<input type="checkbox"/> TDUs <input type="checkbox"/> <b>Federal, State, and Provincial Regulatory or other Government Entities</b>
	<input type="checkbox"/> Generators

**Questions 1-7 address the proposed Process for certifying Reliability Authority**

**1. Do you agree that there is a reliability-related need to certify the Reliability Authority function?**

Yes  
 No  
 Neutral

Comments:

**2. When there are multiple regions involved, should one region take the lead and make the certification decision or should all involved regions be more actively involved in the interim milestones associated with certification?**

One Region should take the lead and make the certification decision.  
 All Regions should be actively involved in the interim milestones of certification.

Comments

**3. Who should certify the Reliability Authority function?**

- Region
- NERC
- RTO
- Independent Team

Comments:

**The recommended Review Team consists of a minimum of three individuals selected from at least three of the categories listed below:**

- **Interchange Authority**
- **Balancing Authority**
- **Reliability Authority**
- **Transmission Operator**
- **Regional Compliance Committee member**
- **Regional Operating Committee member**
- **Representative of NERC Staff**
- **Representative from another NERC Region**
- **Representative from an RTO, when applicable**

**In the alternative, the Region may elect, with the applicant agreement, to engage a completely independent review team.**

**4. Do we have the appropriate review team members identified?**

- Yes
- No

Comments: If this question refers to categories yes-the categories are appropriate. NPCC also recommends that the individuals selected have broad, system wide operating system experience. NERC staff, while listed as a category, should not be a voting member.

NPCC feels there should be a minimum of one representative from each of the four categories, IA,RA,BA, and TO.

**5. Should a NERC staff person be assigned to each review team?**

Yes

No

Comments Possibly when the RA spans more than one Region, and as a non-voting facilitator.

**6. Have we included anything in the certification process that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

Yes

No

Comments:

**7. Have we missed a step in the certification process that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

Comments:

***Questions 8-13 address the proposed Criteria included in the SAR.***

**8. Which of the following agreements do you think are necessary? (Check all that you feel should apply)**

An agreement defining responsibilities and authority (during normal and emergency conditions) of the Reliability Authority with respect to

Each adjacent Reliability Authority

Each applicable Balancing Authority

Each applicable Interchange Authority

Each applicable Transmission Operator

Each applicable Transmission Service Provider

Comments:

**9. What other agreements should be required for the Reliability Authority?**

Comments:

**10. Who should be required to sign a confidentiality agreement?**

- Reliability Authorities
- Balancing Authorities
- Interchange Authorities
- Transmission Operators
- Transmission Service Providers

Comments:

**11. Have we included anything in the certification criteria that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

- Yes
- No

Comments:

**12. Have we missed anything in the certification criteria that you think is necessary? If yes, please provide details on what you think should be added.**

- Yes
- No

Comments: The SAR should provide flexibility for information routing to fully integrate the TO in the process.

**13. If you are aware of any Regional Differences that need to be addressed in this SAR, please highlight them here.**

Regional Difference:

**14. Other Comments on this Certification SAR:**

Comments: Coordination between the existing Reliability Coordinator(s) and the new RA(s) needs to be understood and considered during the development of the RA standard.

**Procedures currently exist for re-certification of control areas. Considerations are being given for inclusion of re -certification in the certification standards.**

**15. When should re -certification occur?**

Check all that apply

- Periodic
- Significant change in footprint, corporate organization, or operation
- Repetitive Non-Compliance with Reliability Standards
- Flagrant violation of Reliability Standards

**Comments:**

**SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

<b>SAR Commenter Information</b>	<b>Which Industry Segment do you represent?</b>
Name            John Muir	<input checked="" type="checkbox"/> Trans Owners <input type="checkbox"/> <b>Brokers, Aggregators, and Marketers</b>
Organization    Consolidated Edison, Inc.	<input type="checkbox"/> RTOs, ISOs, RRCs <input type="checkbox"/> Large Electricity End Users
Telephone        845-577-3332	<input type="checkbox"/> LSEs <input type="checkbox"/> Small Electricity Users
E-mail            muirj@oru.com	<input type="checkbox"/> TDUs <input type="checkbox"/> <b>Federal, State, and Provincial Regulatory or other Government Entities</b>
	<input type="checkbox"/> Generators

**Questions 1-7 address the proposed Process for certifying Reliability Authority**

**1. Do you agree that there is a reliability-related need to certify the Reliability Authority function?**

Yes  
 No  
 Neutral

Comments:

**2. When there are multiple regions involved, should one region take the lead and make the certification decision or should all involved regions be more actively involved in the interim milestones associated with certification?**

One Region should take the lead and make the certification decision.  
 All Regions should be actively involved in the interim milestones of certification.

Comments

**3. Who should certify the Reliability Authority function?**

- Region
- NERC
- RTO
- Independent Team

Comments:

**The recommended Review Team consists of a minimum of three individuals selected from at least three of the categories listed below:**

- **Interchange Authority**
- **Balancing Authority**
- **Reliability Authority**
- **Transmission Operator**
- **Regional Compliance Committee member**
- **Regional Operating Committee member**
- **Representative of NERC Staff**
- **Representative from another NERC Region**
- **Representative from an RTO, when applicable**

**In the alternative, the Region may elect, with the applicant agreement, to engage a completely independent review team.**

**4. Do we have the appropriate review team members identified?**

- Yes
- No

Comments:

**5. Should a NERC staff person be assigned to each review team?**

- Yes
- No

Comments

**6. Have we included anything in the certification process that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

Yes

No

Comments:

**7. Have we missed a step in the certification process that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

Comments:

**Questions 8-13 address the proposed Criteria included in the SAR.**

**8. Which of the following agreements do you think are necessary? (Check all that you feel should apply)**

An agreement defining responsibilities and authority (during normal and emergency conditions) of the Reliability Authority with respect to

Each adjacent Reliability Authority

Each applicable Balancing Authority

Each applicable Interchange Authority

Each applicable Transmission Operator

Each applicable Transmission Service Provider

Comments:

**9. What other agreements should be required for the Reliability Authority?**

Comments:

**10. Who should be required to sign a confidentiality agreement?**

- Reliability Authorities
- Balancing Authorities
- Interchange Authorities
- Transmission Operators
- Transmission Service Providers

Comments:

**11. Have we included anything in the certification criteria that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

- Yes
- No

Comments:

**12. Have we missed anything in the certification criteria that you think is necessary? If yes, please provide details on what you think should be added.**

- Yes
- No

Comments:

**13. If you are aware of any Regional Differences that need to be addressed in this SAR, please highlight them here.**

Regional Difference:

**14. Other Comments on this Certification SAR:**

Comments:

**Procedures currently exist for re-certification of control areas. Considerations are being given for inclusion of re -certification in the certification standards.**

**15. When should re -certification occur?**

Check all that apply

- Periodic
- Significant change in footprint, corporate organization, or operation
- Repetitive Non-Compliance with Reliability Standards
- Flagrant violation of Reliability Standards

**Comments:**

## SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR

SAR Commenter Information		Which Industry Segment do you represent?	
Name	Andrew Wilcox	<input checked="" type="checkbox"/> Trans Owners	<input type="checkbox"/> Brokers, Aggregators, and Marketers
Organization	NB Power	<input type="checkbox"/> RTOs, ISOs, RRCs	<input type="checkbox"/> Large Electricity End Users
Telephone	(506) 443 6558	<input type="checkbox"/> LSEs	<input type="checkbox"/> Small Electricity Users
E-mail	awilcox@nbpower.com	<input type="checkbox"/> TDUs	<input type="checkbox"/> Federal, State, and Provincial Regulatory or other Government Entities
		<input type="checkbox"/> Generators	

**Questions 1-7 address the proposed Process for certifying Reliability Authority**

**1. Do you agree that there is a reliability-related need to certify the Reliability Authority function?**

- Yes  
 No  
 Neutral

Comments:

**2. When there are multiple regions involved, should one region take the lead and make the certification decision or should all involved regions be more actively involved in the interim milestones associated with certification?**

- One Region should take the lead and make the certification decision.  
 All Regions should be actively involved in the interim milestones of certification.

Comments Neutral.

**3. Who should certify the Reliability Authority function?**

- Region
- NERC
- RTO
- Independent Team

Comments:

**The recommended Review Team consists of a minimum of three individuals selected from at least three of the categories listed below:**

- **Interchange Authority**
- **Balancing Authority**
- **Reliability Authority**
- **Transmission Operator**
- **Regional Compliance Committee member**
- **Regional Operating Committee member**
- **Representative of NERC Staff**
- **Representative from another NERC Region**
- **Representative from an RTO, when applicable**

**In the alternative, the Region may elect, with the applicant agreement, to engage a completely independent review team.**

**4. Do we have the appropriate review team members identified?**

- Yes
- No

Comments:

**5. Should a NERC staff person be assigned to each review team?**

- Yes
- No

Comments Possibly when the Reliability Authority spans more than one Region.

**6. Have we included anything in the certification process that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

Yes

No

Comments:

**7. Have we missed a step in the certification process that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

Comments:

***Questions 8-13 address the proposed Criteria included in the SAR.***

**8. Which of the following agreements do you think are necessary? (Check all that you feel should apply)**

An agreement defining responsibilities and authority (during normal and emergency conditions) of the Reliability Authority with respect to

Each adjacent Reliability Authority

Each applicable Balancing Authority

Each applicable Interchange Authority

Each applicable Transmission Operator

Each applicable Transmission Service Provider

Comments:

**9. What other agreements should be required for the Reliability Authority?**

Comments:

**10. Who should be required to sign a confidentiality agreement?**

- Reliability Authorities
- Balancing Authorities
- Interchange Authorities
- Transmission Operators
- Transmission Service Providers

Comments:

**11. Have we included anything in the certification criteria that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

- Yes
- No

Comments:

**12. Have we missed anything in the certification criteria that you think is necessary? If yes, please provide details on what you think should be added.**

- Yes
- No

Comments:

**13. If you are aware of any Regional Differences that need to be addressed in this SAR, please highlight them here.**

Regional Difference:

**14. Other Comments on this Certification SAR:**

Comments:

**Procedures currently exist for re-certification of control areas. Considerations are being given for inclusion of re-certification in the certification standards.**

**15. When should re -certification occur?**

Check all that apply

- Periodic
- Significant change in footprint, corporate organization, or operation
- Repetitive Non-Compliance with Reliability Standards
- Flagrant violation of Reliability Standards

**Comments:**

**SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

<b>SAR Commenter Information</b>	<b>Which Industry Segment do you represent?</b>
Name            Alan Boesch	<input checked="" type="checkbox"/> Trans Owners <input type="checkbox"/> <b>Brokers, Aggregators, and Marketers</b>
Organization    NPPD	<input type="checkbox"/> RTOs, ISOs, RRCs <input type="checkbox"/> Large Electricity End Users
Telephone       402-845-5210	<input type="checkbox"/> LSEs <input type="checkbox"/> Small Electricity Users
E-mail            agboesc@nppd.com	<input type="checkbox"/> TDUs <input type="checkbox"/> <b>Federal, State, and Provincial Regulatory or other Government Entities</b>
	<input type="checkbox"/> Generators

**Questions 1-7 address the proposed Process for certifying Reliability Authority**

**1. Do you agree that there is a reliability-related need to certify the Reliability Authority function?**

Yes  
 No  
 Neutral

Comments:

**2. When there are multiple regions involved, should one region take the lead and make the certification decision or should all involved regions be more actively involved in the interim milestones associated with certification?**

One Region should take the lead and make the certification decision.  
 All Regions should be actively involved in the interim milestones of certification.

Comments

**3. Who should certify the Reliability Authority function?**

- Region
- NERC
- RTO
- Independent Team

Comments: NERC should form an independent team to certify the RA

**The recommended Review Team consists of a minimum of three individuals selected from at least three of the categories listed below:**

- **Interchange Authority**
- **Balancing Authority**
- **Reliability Authority**
- **Transmission Operator**
- **Regional Compliance Committee member**
- **Regional Operating Committee member**
- **Representative of NERC Staff**
- **Representative from another NERC Region**
- **Representative from an RTO, when applicable**

**In the alternative, the Region may elect, with the applicant agreement, to engage a completely independent review team.**

**4. Do we have the appropriate review team members identified?**

- Yes
- No

Comments: I believe an knowledgeable independent team should be used

**5. Should a NERC staff person be assigned to each review team?**

- Yes
- No

Comments NERC should coordinate the process

**6. Have we included anything in the certification process that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

Yes

No

Comments: The criteria should be based standards that are developed. This SAR appears to be very detailed.

**7. Have we missed a step in the certification process that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

Comments:

**Questions 8-13 address the proposed Criteria included in the SAR.**

**8. Which of the following agreements do you think are necessary? (Check all that you feel should apply)**

An agreement defining responsibilities and authority (during normal and emergency conditions) of the Reliability Authority with respect to

Each adjacent Reliability Authority

Each applicable Balancing Authority

Each applicable Interchange Authority

Each applicable Transmission Operator

Each applicable Transmission Service Provider

Comments: Maybe this should include generators and LSE's. Should the RA authority be described in a Standard or part of other Standards? I think consistency will be important.

**9. What other agreements should be required for the Reliability Authority?**

Comments:

**10. Who should be required to sign a confidentiality agreement?**

- Reliability Authorities
- Balancing Authorities
- Interchange Authorities
- Transmission Operators
- Transmission Service Providers

Comments:

**11. Have we included anything in the certification criteria that you think is unnecessary?  
If yes, please provide details on what you think we should eliminate.**

- Yes
- No

Comments:

**12. Have we missed anything in the certification criteria that you think is necessary? If  
yes, please provide details on what you think should be added.**

- Yes
- No

Comments:

**13. If you are aware of any Regional Differences that need to be addressed in this SAR,  
please highlight them here.**

Regional Difference: Regional differences should be specified in the standards used for certification.

**14. Other Comments on this Certification SAR:**

Comments:

**Procedures currently exist for re-certification of control areas. Considerations are being given for inclusion of re -certification in the certification standards.**

**15. When should re -certification occur?**

Check all that apply

- Periodic
- Significant change in footprint, corporate organization, or operation
- Repetitive Non-Compliance with Reliability Standards
- Flagrant violation of Reliability Standards

**Comments:** Significant change in applicable standards.

**SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

---

<b>SAR Commenter Information</b>		<b>Which Industry Segment do you represent?</b>	
Name	Alan Johnson	<input type="checkbox"/> Trans Owners	<input checked="" type="checkbox"/> <b>Brokers, Aggregators, and Marketers</b>
Organization	Mirant Americas Energy Marketing	<input type="checkbox"/> RTOs, ISOs, RRCs	<input type="checkbox"/> Large Electricity End Users
Telephone	(678)579-3108	<input type="checkbox"/> LSEs	<input type="checkbox"/> Small Electricity Users
E-mail	alan.r.johnson@mirant.com	<input type="checkbox"/> TDUs	<input type="checkbox"/> <b>Federal, State, and Provincial Regulatory or other Government Entities</b>
		<input type="checkbox"/> Generators	

**Questions 1-7 address the proposed Process for certifying Reliability Authority**

**1. Do you agree that there is a reliability-related need to certify the Reliability Authority function?**

Yes  
 No  
 Neutral

Comments:

**2. When there are multiple regions involved, should one region take the lead and make the certification decision or should all involved regions be more actively involved in the interim milestones associated with certification?**

One Region should take the lead and make the certification decision.  
 All Regions should be actively involved in the interim milestones of certification.

Comments One region should be allowed to take the lead. However, the regions should work together to create the "questionnaires and related documents" that will be used to assess the applicant. Additionally, all regions should be represented on the Review Team. Finally, all regions must concur with the recommendation of the Review Team.

**3. Who should certify the Reliability Authority function?**

- Region
- NERC
- RTO
- Independent Team

Comments: NERC should provide the final stamp of approval, but the region or regions should perform the review and provide a certification recommendation.

**The recommended Review Team consists of a minimum of three individuals selected from at least three of the categories listed below:**

- **Interchange Authority**
- **Balancing Authority**
- **Reliability Authority**
- **Transmission Operator**
- **Regional Compliance Committee member**
- **Regional Operating Committee member**
- **Representative of NERC Staff**
- **Representative from another NERC Region**
- **Representative from an RTO, when applicable**

**In the alternative, the Region may elect, with the applicant agreement, to engage a completely independent review team.**

**4. Do we have the appropriate review team members identified?**

- Yes
- No

Comments: Given that the RA will collect and analyze generator outage data and specify requirements for IOS, it seems to me that either the Generator or PSE functions should be represented on the review team. However, since these functions are represented in the Ballot Body, which will approve the certification criteria, I don't feel strongly about it.

**5. Should a NERC staff person be assigned to each review team?**

- Yes
- No

## SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR

Comments A staff person should be assigned to assure consistent application of criteria across this key function.

**6. Have we included anything in the certification process that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

Yes

No

Comments:

**7. Have we missed a step in the certification process that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

Comments: It's unclear what steps can be taken to resolve disagreement among regions in the case of a RA that crosses regions. Language could potentially be added to step 11 in order to resolve this. Maybe step 18 already addresses this. Also, in step 17, I think clarity should be provided as to what time period NERC has to determine a start date for the approved Applicant and the criteria that will be used to make said determination.

**Questions 8-13 address the proposed Criteria included in the SAR.**

**8. Which of the following agreements do you think are necessary? (Check all that you feel should apply)**

An agreement defining responsibilities and authority (during normal and emergency conditions) of the Reliability Authority with respect to

Each adjacent Reliability Authority

Each applicable Balancing Authority

Each applicable Interchange Authority

Each applicable Transmission Operator

Each applicable Transmission Service Provider

Comments: Because the RA requires information from the BA should coordinate with it and neighboring RAs. May need to direct the TO on occasion, so an agreement detailing process may

be required. It's also possible that being deemed as certified covers this base.

**9. What other agreements should be required for the Reliability Authority?**

Comments: None

**10. Who should be required to sign a confidentiality agreement?**

- Reliability Authorities
- Balancing Authorities
- Interchange Authorities
- Transmission Operators
- Transmission Service Providers

Comments: Any entity that has access to information used to maintain the operational security of the bulk power system should be required to sign a confidentiality agreement. Perhaps this is overkill for those entities operating under a code of conduct. Further, the issue may be better addressed in the NAESB forum as this is not really a reliability issue.

**11. Have we included anything in the certification criteria that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

- Yes
- No

Comments:

**12. Have we missed anything in the certification criteria that you think is necessary? If yes, please provide details on what you think should be added.**

- Yes
- No

Comments:

**13. If you are aware of any Regional Differences that need to be addressed in this SAR, please highlight them here.**

Regional Difference:

**14. Other Comments on this Certification SAR:**

Comments: Generally, this SAR is well written. However, given that the FMRTG continues to discuss the roles of the various functions, it may be premature to issue this SAR.

**Procedures currently exist for re-certification of control areas. Considerations are being given for inclusion of re -certification in the certification standards.**

**15. When should re -certification occur?**

Check all that apply

- Periodic
- Significant change in footprint, corporate organization, or operation
- Repetitive Non-Compliance with Reliability Standards
- Flagrant violation of Reliability Standards

**Comments:** With periodic defined at every 5 - 10 years.

## FRCC OC COMMENT 1/8/03

### SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR

---

SAR Commenter Information	<i>Which Industry Segment do you represent?</i>	
Name           FRCC Operating Committee (see list at end of this comment form). Submitted on behalf of the FRCC OC by Linda Campbell.	<input checked="" type="checkbox"/> Trans Owners	<input type="checkbox"/> Brokers, Aggregators, and Marketers
Organization   FRCC Operating Committee	<input type="checkbox"/> RTOs, ISOs, RRCs	<input type="checkbox"/> Large Electricity End Users
Telephone       813-289-5644	<input checked="" type="checkbox"/> LSEs	<input type="checkbox"/> Small Electricity Users
E-mail           lcampbell@frcc.om	<input checked="" type="checkbox"/> TDUs	<input type="checkbox"/> Federal, State, and Provincial Regulatory or other Government Entities
	<input checked="" type="checkbox"/> Generators	

***Questions 1-7 address the proposed Process for certifying Reliability Authority***

**1. Do you agree that there is a reliability-related need to certify the Reliability Authority function?**

- Yes  
 No  
 Neutral

Comments: The FRCC OC does not really know what the Reliability Authority Function is. It is unclear who this applies to, whether it is to those performing the Reliability Coordinator function today, or to many of our existing control areas. However; the FRCC OC does believe that any entity that performs reliability functions, especially those that direct the actions of others, should be certified.

This SAR is pre-mature since the FMRTG just posted a report yesterday (1/7/03) that may further define or clarify reliability functions. We believe this SAR, along with the other 3 certification SARs should be placed on hold until such time that the reliability functions and relationships are clearly defined and understood by the industry.

**2. When there are multiple regions involved, should one region take the lead and make the certification decision or should all involved regions be more actively involved in the interim milestones associated with certification?**

- One Region should take the lead and make the certification decision.  
 All Regions should be actively involved in the interim milestones of certification.

***FRCC OC COMMENT 1/8/03***

**SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

---

Comments It is important that all regions participate in the certification process to cover all concerns, especially any regional differences.

**3. Who should certify the Reliability Authority function?**

- Region
- NERC
- RTO
- Independent Team

Comments: It should be up to the Region(s) to accomplish the certification process. The Region(s) can choose to use an independent team or choose another method as long as it is fair and balanced. It should NOT be determined by NERC and should not be required to be by an independent third party.

**The recommended Review Team consists of a minimum of three individuals selected from at least three of the categories listed below:**

- **Interchange Authority**
- **Balancing Authority**
- **Reliability Authority**
- **Transmission Operator**
- **Regional Compliance Committee member**
- **Regional Operating Committee member**
- **Representative of NERC Staff**
- **Representative from another NERC Region**
- **Representative from an RTO, when applicable**

**In the alternative, the Region may elect, with the applicant agreement, to engage a completely independent review team.**

**4. Do we have the appropriate review team members identified?**

- Yes
- No

Comments: A representative from Regional Staff should also be included.

**5. Should a NERC staff person be assigned to each review team?**

- Yes

## FRCC OC COMMENT 1/8/03

### SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR

---

No

Comments So that consistency between regions is considered, it may be appropriate to include NERC staff (as a non-voting member) on the review team if desired by the Region(s); however, the Region(s) should lead the review and not NERC.

**6. Have we included anything in the certification process that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

Yes

No

Comments: The certification process itself should NOT be included in this SAR. It is a process that is a series of steps to be followed and is not material to reliability by itself. The certification process steps should be considered a supporting document as anticipated in the Reliability Standard Process Manual. Only the criteria for the RA should be considered a reliability standard and be included in the SAR. NERC should develop an industry review process for items such as supporting documents etc.

**7. Have we missed a step in the certification process that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

Comments: The FRCC OC does have questions regarding several parts of the certification process, but as stated earlier, this should not be part of the standard. The process should be reviewed by the industry in an open due process forum, but, it should not be considered a reliability standard. FRCC will hold our questions on the process for later review.

***Questions 8-13 address the proposed Criteria included in the SAR.***

**8. Which of the following agreements do you think are necessary? (Check all that you feel should apply)**

An agreement defining responsibilities and authority (during normal and emergency conditions) of the Reliability Authority with respect to

Each adjacent Reliability Authority

## FRCC OC COMMENT 1/8/03

### SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR

- Each applicable Balancing Authority
- Each applicable Interchange Authority
- Each applicable Transmission Operator
- Each applicable Transmission Service Provider

Comments: FRCC does not believe that individual agreements with each entity are necessary. A Regions' Security Process (Reliability Plan) should identify the responsibilities and authorities of each function in regards to reliability. Other areas covered in an agreement most likely would be commercial considerations and not reliability responsibilities.

#### 9. What other agreements should be required for the Reliability Authority?

Comments: The FRCC is not sure that any agreements are necessary.

#### 10. Who should be required to sign a confidentiality agreement?

- Reliability Authorities
- Balancing Authorities
- Interchange Authorities
- Transmission Operators
- Transmission Service Providers

Comments: Anyone providing a reliability function with access to commercially sensitive information should be required to sign a confidentiality agreement. A region may also have a separate confidentiality agreement in addition to the NERC agreement. However; is this more of a commercial issue and should it be considered by NAESB rather than NERC? Also, the other entities identified in this question should be addressed through their own respective SAR.

#### 11. Have we included anything in the certification criteria that you think is unnecessary? If yes, please provide details on what you think we should eliminate.

- Yes
- No

Comments: None that we could identify at this point; however, as stated earlier, the certification process itself should not be included in this SAR as we do not consider the process of certification a reliability standard. We do agree that the criteria could be a reliability standard.

## FRCC OC COMMENT 1/8/03

### SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR

**12. Have we missed anything in the certification criteria that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

Comments: The definition of the RA function is extremely vague. It is not clear if the RA is the same as today's Reliability Coordinator or if it is something more. This SAR should be placed on hold until the RA is clearly understood by the entire industry.

There are no requirements for communication (voice, such as the hotline etc) tools or systems, especially with the BA, TOp and other RA's.

Most of the items in section 5 of this SAR speak to having a procedure/process in place, but say nothing about having tools to implement the process or procedure. Having a process or procedure without the ability to implement is not enough.

Item 5.2 requires day ahead hourly dispatch pattern to be given to the RA. FRCC does not support this requirement at all. The individual RA, or the Region(s) should determine what is required to support their security process (reliability plan). A RA may only require a day ahead commitment schedule and not hourly dispatch values. NERC should NOT make this hourly dispatch requirement decision.

**13. If you are aware of any Regional Differences that need to be addressed in this SAR, please highlight them here.**

Regional Difference: FRCC requires their own confidentiality agreement in addition to the NERC agreement. In addition, FRCC's Security Process (Reliability Plan) has other requirements for tools etc that must be met.

Also, NERC can not set a requirement for the RA that will preempt any state jurisdictional requirements.

## FRCC OC COMMENT 1/8/03

### SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR

---

#### 14. Other Comments on this Certification SAR:

Comments: The process for certification should be removed from this SAR completely.

**Procedures currently exist for re-certification of control areas. Considerations are being given for inclusion of re-certification in the certification standards.**

#### 15. When should re-certification occur?

Check all that apply

- Periodic
- Significant change in footprint, corporate organization, or operation
- Repetitive Non-Compliance with Reliability Standards
- Flagrant violation of Reliability Standards

**Comments:** FRCC does not believe a re-certification process is necessary. The RA will be monitored through the compliance measures included in the standard. A separate re-certification process is an unnecessary and costly make-work effort. Having said that, we do believe that a process for de-certification should be developed to address repetitive non-compliance or flagrant violation of reliability standards.

The following is a list of the FRCC OC members and guests that submit this comment form. This comment form was approved by all OC members on 1/8/03. The SAR drafting team or requester should consider this in weighting the comments submitted.

#### **Transmission Owners**

Chuck Harper, Progress Energy – Florida  
Eric Grant – Progress Energy – Florida  
Bill Slater – Progress Energy - Florida  
Marty Mennes – Florida Power & Light Company  
Beth Young – Tampa Electric Company  
Jose Quintas – Tampa Electric Company

#### **Load Serving Entity**

Mark Bennett – Gainesville Regional Utilities  
Ted Hobson – JEA  
Richard Gilbert – Lakeland Electric  
Paul Shipps – Lakeland Electric  
Tom Calabro – Orlando Utilities Commission  
Rusty Foster – City of Tallahassee  
Robert Miller – Kissimmee Utility Authority  
Greg Woessner – Kissimmee Utility Authority

## **FRCC OC COMMENT 1/8/03**

### **SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

---

Bob Remley – Clay Electric Cooperative  
Steve Treece – Ft. Pierce Utilities Authority  
Joe Roos – Ocala Electric Utility  
Tim Beyrle – Utilities Commission of New Smyrna Beach  
John Giddens – Reedy Creek Improvement District

#### **Generator**

Gary Jackson – Calpine Corporation  
Douglas Bullock – Indiantown Cogeneration, L.P.  
John Twitchell – Mirant Corporation  
Mike Antonell – Reliant Energy Services

#### **Transmission Dependent Utilities**

Steve Wallace – Seminole Electric Cooperative  
Joe Welborn – Seminole Electric Cooperative

## SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR

<b>SAR Commenter Information</b>	<b>Which Industry Segment do you represent?</b>
Name Ken Githens	<input type="checkbox"/> Trans Owners <input type="checkbox"/> <b>Brokers, Aggregators, and Marketers</b>
Organization Allegheny Energy Supply	<input type="checkbox"/> RTOs, ISOs, RRCs <input type="checkbox"/> Large Electricity End Users
Telephone 412-858-1635	<input type="checkbox"/> LSEs <input type="checkbox"/> Small Electricity Users
E-mail com kgithen@alleghenyenergy.	<input type="checkbox"/> TDUs <input type="checkbox"/> <b>Federal, State, and Provincial Regulatory or other Government Entities</b>
	<input checked="" type="checkbox"/> Generators

**Questions 1-7 address the proposed Process for certifying Reliability Authority**

**1. Do you agree that there is a reliability-related need to certify the Reliability Authority function?**

- Yes  
 No  
 Neutral

Comments: But, the certification process should not be a standard. The certification process could be covered by a business procedure.

**2. When there are multiple regions involved, should one region take the lead and make the certification decision or should all involved regions be more actively involved in the interim milestones associated with certification?**

- One Region should take the lead and make the certification decision.  
 All Regions should be actively involved in the interim milestones of certification.

Comments Other regions could provide resources needed to the review team to conduct the certification.

**3. Who should certify the Reliability Authority function?**

- Region
- NERC
- RTO
- Independent Team

Comments: The independent team should be composed of representatives from NERC, NAESB, and possibly RTO/ISO's. Certifying entities need to certify not only reliability standards but also the associated market/commercial standards. All certifications would be completed at the same time.

**The recommended Review Team consists of a minimum of three individuals selected from at least three of the categories listed below:**

- **Interchange Authority**
- **Balancing Authority**
- **Reliability Authority**
- **Transmission Operator**
- **Regional Compliance Committee member**
- **Regional Operating Committee member**
- **Representative of NERC Staff**
- **Representative from another NERC Region**
- **Representative from an RTO, when applicable**

**In the alternative, the Region may elect, with the applicant agreement, to engage a completely independent review team.**

**4. Do we have the appropriate review team members identified?**

- Yes
- No

Comments: See comment for question 3.

**5. Should a NERC staff person be assigned to each review team?**

- Yes
- No

**SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

---

Comments

**6. Have we included anything in the certification process that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

Yes

No

Comments:

**7. Have we missed a step in the certification process that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

Comments:

**Questions 8-13 address the proposed Criteria included in the SAR.**

**8. Which of the following agreements do you think are necessary? (Check all that you feel should apply)**

An agreement defining responsibilities and authority (during normal and emergency conditions) of the Reliability Authority with respect to

Each adjacent Reliability Authority

Each applicable Balancing Authority

Each applicable Interchange Authority

Each applicable Transmission Operator

Each applicable Transmission Service Provider

Comments:

**9. What other agreements should be required for the Reliability Authority?**

Comments:

**10. Who should be required to sign a confidentiality agreement?**

- Reliability Authorities
- Balancing Authorities
- Interchange Authorities
- Transmission Operators
- Transmission Service Providers

Comments:

**11. Have we included anything in the certification criteria that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

- Yes
- No

Comments:

**12. Have we missed anything in the certification criteria that you think is necessary? If yes, please provide details on what you think should be added.**

- Yes
- No

Comments:

**13. If you are aware of any Regional Differences that need to be addressed in this SAR, please highlight them here.**

Regional Difference:



**14. Other Comments on this Certification SAR:**

Comments: Any certification team member should not be an employee of the organization being certified.

**Procedures currently exist for re-certification of control areas. Considerations are being given for inclusion of re -certification in the certification standards.**

**15. When should re -certification occur?**

Check all that apply

- Periodic
- Significant change in footprint, corporate organization, or operation
- Repetitive Non-Compliance with Reliability Standards
- Flagrant violation of Reliability Standards

**Comments:** Periodic recertification time intervals should be extended if other item are included.

## SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR

SAR Commenter Information		Which Industry Segment do you represent?	
Name	Ed Groce	<input type="checkbox"/> Trans Owners	<input type="checkbox"/> Brokers, Aggregators, and Marketers
Organization	Avista Utilities	<input type="checkbox"/> RTOs, ISOs, RRCs	<input type="checkbox"/> Large Electricity End Users
Telephone	509-495-4164	<input type="checkbox"/> LSEs	<input type="checkbox"/> Small Electricity Users
E-mail	ed.groce@avistacorp.com	<input type="checkbox"/> TDUs	<input type="checkbox"/> Federal, State, and Provincial Regulatory or other Government Entities
		<input checked="" type="checkbox"/> Generators	

**Questions 1-7 address the proposed Process for certifying Reliability Authority**

**1. Do you agree that there is a reliability-related need to certify the Reliability Authority function?**

- Yes  
 No  
 Neutral

Comments: Reliability coordinators in the WECC have demonstrated the capability to mitigate reliability problems

**2. When there are multiple regions involved, should one region take the lead and make the certification decision or should all involved regions be more actively involved in the interim milestones as associated with certification?**

- One Region should take the lead and make the certification decision.  
 All Regions should be actively involved in the interim milestones of certification.

Comments

**3. Who should certify the Reliability Authority function?**

- Region
- NERC
- RTO
- Independent Team

Comments:

**The recommended Review Team consists of a minimum of three individuals selected from at least three of the categories listed below:**

- **Interchange Authority**
- **Balancing Authority**
- **Reliability Authority**
- **Transmission Operator**
- **Regional Compliance Committee member**
- **Regional Operating Committee member**
- **Representative of NERC Staff**
- **Representative from another NERC Region**
- **Representative from an RTO, when applicable**

**In the alternative, the Region may elect, with the applicant agreement, to engage a completely independent review team.**

**4. Do we have the appropriate review team members identified?**

- Yes
- No

Comments:

**5. Should a NERC staff person be assigned to each review team?**

- Yes
- No

Comments

**6. Have we included anything in the certification process that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

Yes

No

Comments:

**7. Have we missed a step in the certification process that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

Comments:

**Questions 8-13 address the proposed Criteria included in the SAR.**

**8. Which of the following agreements do you think are necessary? (Check all that you feel should apply)**

An agreement defining responsibilities and authority (during normal and emergency conditions) of the Reliability Authority with respect to

Each adjacent Reliability Authority

Each applicable Balancing Authority

Each applicable Interchange Authority

Each applicable Transmission Operator

Each applicable Transmission Service Provider

Comments:

**9. What other agreements should be required for the Reliability Authority?**

Comments: Currently, empowerment agreements are used to "authorize" reliability coordinators to issue directives to maintain system reliability. The content of those agreements should be reflected in new agreements as above.

**10. Who should be required to sign a confidentiality agreement?**

- Reliability Authorities
- Balancing Authorities
- Interchange Authorities
- Transmission Operators
- Transmission Service Providers

Comments:

**11. Have we included anything in the certification criteria that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

- Yes
- No

Comments:

**12. Have we missed anything in the certification criteria that you think is necessary? If yes, please provide details on what you think should be added.**

- Yes
- No

Comments:

**13. If you are aware of any Regional Differences that need to be addressed in this SAR, please highlight them here.**

Regional Difference:

**14. Other Comments on this Certification SAR:**

Comments:

**Procedures currently exist for re-certification of control areas. Considerations are being given for inclusion of re -certification in the certification standards.**

**15. When should re -certification occur?**

Check all that apply

- Periodic
- Significant change in footprint, corporate organization, or operation
- Repetitive Non-Compliance with Reliability Standards
- Flagrant violation of Reliability Standards

**Comments:**

## **SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

*The latest version of this SAR (RA\_CERTIFICATION\_01\_01) is posted on the Standards web site at: <http://www.nerc.com/~filez/sar-approved.html>*

*E-mail this form between December 1–January 10, 2003 to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with “SAR Comments” in the subject line.*

***Please review the SAR and answer the questions in the yellow boxes.***

NOTE: The SAR contains the process for certification, followed by the criteria for certification; the questions in this SAR Comment Form are presented in the same order as the SAR.

*If you have questions, please call Maureen Long at 305-891-5497 or send a question to [spm@nerc.com](mailto:spm@nerc.com).*

### **Background**

The Organization Certification Task Force (OCTF) was formed several months ago to draft certification and registration programs to replace the existing Control Area certification and organization registration processes and procedures.

The OCTF held a series of workshops and posted a White Paper to collect preliminary industry comments on the criteria relevant to the new functional entities and there-by develop new processes and procedures for certifying each of these entities. (All the comments collected during these preliminary steps are posted at <http://www.nerc.com/~filez/octf.html>)

This SAR is one of four SARs being posted simultaneously for comment. These SARs, collectively, identify the certification criteria for the Reliability Authority (RA), Balancing Authority (BA), Interchange Authority (IA) and Transmission Operator (TOP). At this time, these are the only functions being considered for certification. Other functions may be considered for certification in the future. (The functions referred to in this document are the functions identified in the NERC Functional Model. <http://www.nerc.com/~oc/fmrtg.html>)

Certification Criteria are those requirements that an entity must meet to be “Certified” by NERC or another certifying entity such as one of the NERC Regions. NERC Certification is an indication that an organization has the resources in place and the ability to perform a reliability function, such as a Balancing Authority, Interchange Authority, etc. Entities that attain their Certification status must comply with applicable NERC Reliability Standards and criteria. Entities that serve multiple reliability functions may need to attain more than one certification. Where an entity wants multiple certifications, we expect to develop a system whereby that entity could apply for all certifications at one time.

**SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

---

<b>SAR Commenter Information</b>		<b>Which Industry Segment do you represent?</b>	
Name	Tony Jankowski	<input type="checkbox"/> Trans Owners	<input type="checkbox"/> <b>Brokers, Aggregators, and Marketers</b>
Organization	Wisconsin Electric Power Co (We Energies)	<input type="checkbox"/> RTOs, ISOs, RRCs	<input type="checkbox"/> Large Electricity End Users
Telephone	262-673-9607	<input checked="" type="checkbox"/> LSEs	<input type="checkbox"/> Small Electricity Users
E-mail	tony.jankowski@we-energies.com	<input checked="" type="checkbox"/> TDUs	<input type="checkbox"/> <b>Federal, State, and Provincial Regulatory or other Government Entities</b>
		<input checked="" type="checkbox"/> Generators	

**Questions 1-7 address the proposed Process for certifying Reliability Authority**

**1. Do you agree that there is a reliability-related need to certify the Reliability Authority function?**

Yes  
 No  
 Neutral

Comments: Should also include clarification on how the area of responsibility of the RA is defined.

**2. When there are multiple regions involved, should one region take the lead and make the certification decision or should all involved regions be more actively involved in the interim milestones associated with certification?**

One Region should take the lead and make the certification decision.  
 All Regions should be actively involved in the interim milestones of certification.

Comments: Are you asking whether RA areas should be constrained by Regional boundaries? If more than one Region were to be involved in the RA certification, what process would be used if some Regions approved the certification and some declined?

Concern: If only one region were involved the chance of overlooking or not identifying region specific issues may be a problem.

**3. Who should certify the Reliability Authority function?**

- Region
- NERC
- RTO
- Independent Team

Comments: NERC should be the organization that certifies RA's. This removes a problem of conflicting regional requirements. We have identified two scenarios:

1) NERC may elect to delegate that responsibility to a Regional Council in those cases where the area of the RA is contained entirely in one Region, and

2) In cases where the RA crosses regional boundaries, NERC could establish a balanced, cross-regional panel that would conduct a single certification process.

Additionally, we believe that there should be a separate SAR/Standard that would establish a process for conducting all certification activities.

Each "Operating Authority" (RA, BA, TOP, IA, PA . . . ) that a certification would be required for should have its own SAR for certification criteria and requirements.

**The recommended Review Team consists of a minimum of three individuals selected from at least three of the categories listed below:**

- **Interchange Authority**
- **Balancing Authority**
- **Reliability Authority**
- **Transmission Operator**
- **Regional Compliance Committee member**
- **Regional Operating Committee member**
- **Representative of NERC Staff**
- **Representative from another NERC Region**
- **Representative from an RTO, when applicable**

**In the alternative, the Region may elect, with the applicant agreement, to engage a completely independent review team.**

**4. Do we have the appropriate review team members identified?**

- Yes

## SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR

No

Comments: This question appears to assume the answer to the previous question has already been determined that the Region conducts the certification. Please see answer above in #3.

Any list should also require that those members of the certification team be knowledgeable in the relevant functions that would be performed by the RA requesting certification, and at least one member of the team should be NERC certified as a RA. The certification process should clearly define what constitutes consensus. The Review Team must be composed of representatives of members from each applicable type of authority and function that is immediately and directly affected by the activities and functions of the organization being certified.

### 5. Should a NERC staff person be assigned to each review team?

Yes

No

Comments The staff person should be from the NERC Compliance department and be familiar with the certification process and the requirements of the RA function. It would help ensure that a consistent methodology is applied to the certification process.

### 6. Have we included anything in the certification process that you think is unnecessary? If yes, please provide details on what you think we should eliminate.

Yes

No

Comments: The process outlined in the SAR presumes that the Region would be responsible for initiating the certification. We believe that NERC should be responsible for conducting the certification process.

To avoid the appearance of a conflict of interest, the opportunity of the applicant to approve review team members should be removed. (e.g. step 9).

The process assumes that the IDC continues to exist. This should be removed.

On page SAR-2 under Reliability Authority Certification Process #3, we feel the timeframe for completion listed at nine months is excessive. A three to six month timeframe would be preferred. The entity making the application deserves to have a resolution in a timely manner. A nine month waiting period is unreasonable.

### 7. Have we missed a step in the certification process that you think is necessary? If yes, please provide details on what you think should be added.

Yes

No

## SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR

Comments: There is not a provision for review of certification criteria and requirements by organizations that would be subordinate to the RA. This should be part of the initial questionnaire.

**Questions 8-13 address the proposed Criteria included in the SAR.**

### 8. Which of the following agreements do you think are necessary? (Check all that you feel should apply)

An agreement defining responsibilities and authority (during normal and emergency conditions) of the Reliability Authority with respect to

- Each adjacent Reliability Authority
- Each applicable Balancing Authority
- Each applicable Interchange Authority
- Each applicable Transmission Operator
- Each applicable Transmission Service Provider

The boundary of responsibility should be conducted through a registration process facilitated by NERC: The Transmission Owner designates its Transmission Operator and each Transmission Operator designates its Reliability Authority.

This registration conveys the expectation that the operator and RA will comply with NERC Standards and has the responsibility to carry out good utility practice.

### 9. What other agreements should be required for the Reliability Authority?

Comments: The RA should have agreements in place that support the concept of the "Coordinate Operations" standard with boundary connected authorities and operators.

### 10. Who should be required to sign a confidentiality agreement?

- Reliability Authorities
- Balancing Authorities
- Interchange Authorities
- Transmission Operators
- Transmission Service Providers

Comments: Relative to certifying RA's, the status of the other groups' signing is irrelevant.

**SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

---

The RA should be required to sign at least a NERC Confidentiality Agreement.

**11. Have we included anything in the certification criteria that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

Yes

No

Comments: The certification criteria and requirements contained in the standard need to be more specific and contain what constitutes failure to meet.

**12. Have we missed anything in the certification criteria that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

Comments: There should be a statement that clearly states that the RA applicant can comply with all applicable NERC standards.

There is no description of the circumstances under which a RA would be decertified.

Need to clearly state that "All" listed criteria and requirements must be met -- no exceptions.

**13. If you are aware of any Regional Differences that need to be addressed in this SAR, please highlight them here.**

Regional Difference: None -- All organization certifications need to be consistent.

**14. Other Comments on this Certification SAR:**

Comments: Throughout the text the SAR implies that the Region has authority for conducting the certification process, up to and including dispute resolution. This conflicts with your question asking who should conduct the certification and the concept at NERC as the certification authority.

**Procedures currently exist for re-certification of control areas. Considerations are being given for inclusion of re -certification in the certification standards.**

**15. When should re-certification occur?**

Check all that apply

- Periodic 3 – 5 years
- Significant change in area of responsibility, corporate organization, or operation
- Repetitive Non-Compliance with Reliability Standards
- Flagrant violation of Reliability Standards

**Comments:** Recertification due to repetitive and /or flagrant non-compliance should only be initiated upon decertification by the Compliance and Monitoring Program.

**From:** Miller, Mike B. [MBMILLER@southernco.com]

**Sent:** Tuesday, January 07, 2003 5:59 PM

**To:** Ulch, R. Dean

**Subject:** RA Comment.doc

Mike Miller SAR comment on Reliability Authority

## Background


The Organization Certification Task Force (OCTF) was formed several months ago to draft certification and registration programs to replace the existing Control Area certification and organization registration processes and procedures.

The OCTF held a series of workshops and

posted a White Paper to collect preliminary industry comments on the criteria relevant to the new functional entities and there-by develop new processes and procedures for certifying each of these entities. (All the comments collected during these preliminary steps are posted at <http://www.nerc.com/~filez/octf.html>)

This SAR is one of four SARs being posted simultaneously for comment. These SARs, collectively, identify the certification criteria for the Reliability Authority (RA), Balancing Authority (BA), Interchange Authority (IA) and Transmission Operator (TOP). At this time, these are the only functions being considered for certification. Other functions may be considered for certification in the future. (The functions referred to in this document are the functions identified in the NERC Functional Model. <http://www.nerc.com/~oc/fmrtg.html>)

Certification Criteria are those requirements that an entity must meet to be "Certified" by NERC or another certifying entity such as one of the NERC Regions. NERC Certification is an indication that an organization has the resources in place and the ability to perform a reliability function, such as a Balancing Authority, Interchange Authority, etc. Entities that attain their Certification status must comply with applicable NERC Reliability Standards and criteria. Entities that serve multiple reliability functions may need to attain more than one certification. Where an entity wants multiple certifications, we expect to develop a system whereby that entity could apply for all certifications at one time.

 Text Box: The latest version of this SAR (RA\_CERTIFICATION\_01\_01) is posted on the Standards web site at: <http://www.nerc.com/~filez/sar-approved.html>

E-mail this form between December 1-January 10, 2003 to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with "SAR Comments" in the subject line.

Please review the SAR and answer the questions in the yellow boxes.

NOTE: The SAR contains the process for certification, followed by the criteria for certification; the questions in this SAR Comment Form are presented in the same order as the SAR.

If you have questions, please call Maureen Long at 305-891-5497 or send a question to [spm@nerc.com](mailto:spm@nerc.com).

<b>SAR Commenter Information</b>		<b>Which Industry Segment do you represent?</b>	
Name	Mike Miller	Trans Owners RTOs, ISOs, RRCs	<b>Brokers, Aggregators, and Marketers</b>
Organization	Southern Company	LSEs	Large Electricity End Users
Telephone	205 257 7755	TDU's	Small Electricity Users
E-mail	mbmiller@southernco.com	Generators	<b>Federal, State, and Provincial Regulatory or other Government Entities</b>

**Questions 1-7 address the proposed Process for certifying Reliability Authority**

**1. Do you agree that there is a reliability-related need to certify the Reliability Authority function?**

Yes

No

Neutral

Comments:

**2. When there are multiple regions involved, should one region take the lead and make the certification decision or should all involved regions be more actively involved in the interim milestones associated with certification?**

One Region should take the lead and make the certification decision.

All Regions should be actively involved in the interim milestones of certification.

Comments Since a RA reviews seams issues among control areas and several regions could be subjected to decisions of a RA, the region or regions should be actively involved.

**3. Who should certify the Reliability Authority function?**

Region  
 NERC  
 RTO  
 Independent Team

Comments: Regional knowledge will ensure RA meets requirements. It could be possible to utilize an independent team made up of regional, NERC and RTO participates.

**The recommended Review Team consists of a minimum of three individuals selected from at least three of the categories listed below:**

- **Interchange Authority**
- **Balancing Authority**
- **Reliability Authority**
- **Transmission Operator**
- **Regional Compliance Committee member**
- **Regional Operating Committee member**
- **Representative of NERC Staff**
- **Representative from another NERC Region**
- **Representative from an RTO, when applicable**

**In the alternative, the Region may elect, with the applicant agreement, to engage a completely independent review team.**

**4. Do we have the appropriate review team members identified?**

Yes  
 No

Comments: 1. The review team should have one NERC certified individual. 2. Transmission Owners should be represented since significant assets are owned but being managed by RA. This will provide access to owners of assets putting control into RA with ownership input.

**5. Should a NERC staff person be assigned to each review team?**

Yes  
 No  
 Comments

**6. Have we included anything in the certification process that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

Yes  
 No  
 Comments:

**7. Have we missed a step in the certification process that you think is necessary? If yes, please provide details on what you think should be added.**

Yes  
 No  
 Comments:

**Questions 8-13 address the proposed Criteria included in the SAR.**

**8. Which of the following agreements do you think are necessary? (Check all that you feel should apply)**

An agreement defining responsibilities and authority (during normal and emergency conditions) of the Reliability Authority with respect to

Each adjacent Reliability Authority  
 Each applicable Balancing Authority  
 Each applicable Interchange Authority  
 Each applicable Transmission Operator  
 Each applicable Transmission Service Provider  
 Comments: Add Transmission Owner.

**9. What other agreements should be required for the Reliability Authority?**

Comments: Add agreement between RA and Transmission Owner, during normal / emergency operation since it is likely that owner could be held responsible during litigation.

**10. Who should be required to sign a confidentiality agreement?**

Reliability Authorities  
 Balancing Authorities  
 Interchange Authorities  
 Transmission Operators  
 Transmission Service Providers  
 Comments:

**11. Have we included anything in the certification criteria that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

Yes  
 No  
 Comments:

**12. Have we missed anything in the certification criteria that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No  
Comments:

**13. If you are aware of any Regional Differences that need to be addressed in this SAR, please highlight them here.**

Regional Difference: It is to early to document regional differences so time will tell.

**14. Other Comments on this Certification SAR:**

Comments:

**Procedures currently exist for re-certification of control areas. Considerations are being given for inclusion of re-certification in the certification standards.**

**15. When should re-certification occur?**

Check all that apply

Periodic

Significant change in footprint, corporate organization, or operation

Repetitive Non-Compliance with Reliability Standards

Flagrant violation of Reliability Standards

**Comments:** Periodically should be every 3 years.

## **SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

*The latest version of this SAR (RA\_CERTIFICATION\_01\_01) is posted on the Standards web site at: <http://www.nerc.com/~filez/sar-approved.html>*

*E-mail this form between December 1–January 10, 2003 to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with “SAR Comments” in the subject line.*

***Please review the SAR and answer the questions in the yellow boxes.***

NOTE: The SAR contains the process for certification, followed by the criteria for certification; the questions in this SAR Comment Form are presented in the same order as the SAR.

*If you have questions, please call Maureen Long at 305-891-5497 or send a question to [spm@nerc.com](mailto:spm@nerc.com).*

### **Background**

The Organization Certification Task Force (OCTF) was formed several months ago to draft certification and registration programs to replace the existing Control Area certification and organization registration processes and procedures.

The OCTF held a series of workshops and posted a White Paper to collect preliminary industry comments on the criteria relevant to the new functional entities and there-by develop new processes and procedures for certifying each of these entities. (All the comments collected during these preliminary steps are posted at <http://www.nerc.com/~filez/octf.html>)

This SAR is one of four SARs being posted simultaneously for comment. These SARs, collectively, identify the certification criteria for the Reliability Authority (RA), Balancing Authority (BA), Interchange Authority (IA) and Transmission Operator (TOP). At this time, these are the only functions being considered for certification. Other functions may be considered for certification in the future. (The functions referred to in this document are the functions identified in the NERC Functional Model. <http://www.nerc.com/~oc/fmrtg.html>)

Certification Criteria are those requirements that an entity must meet to be “Certified” by NERC or another certifying entity such as one of the NERC Regions. NERC Certification is an indication that an organization has the resources in place and the ability to perform a reliability function, such as a Balancing Authority, Interchange Authority, etc. Entities that attain their Certification status must comply with applicable NERC Reliability Standards and criteria. Entities that serve multiple reliability functions may need to attain more than one certification. Where an entity wants multiple certifications, we expect to develop a system whereby that entity could apply for all certifications at one time.

## SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR

SAR Commenter Information		Which Industry Segment do you represent?	
Name	Michael Desselle	<input checked="" type="checkbox"/> Trans Owners	<input checked="" type="checkbox"/> <b>Brokers, Aggregators, and Marketers</b>
Organization	American Electric Power	<input type="checkbox"/> RTOs, ISOs, RRCs	<input type="checkbox"/> Large Electricity End Users
Telephone	214-777-1826	<input checked="" type="checkbox"/> LSEs	<input type="checkbox"/> Small Electricity Users
E-mail	mddesselle@aep.com	<input type="checkbox"/> TDUs	<input type="checkbox"/> <b>Federal, State, and Provincial Regulatory or other Government Entities</b>
		<input checked="" type="checkbox"/> Generators	

**Questions 1-7 address the proposed Process for certifying Reliability Authority**

**1. Do you agree that there is a reliability-related need to certify the Reliability Authority function?**

- Yes  
 No  
 Neutral

Comments:

**2. When there are multiple regions involved, should one region take the lead and make the certification decision or should all involved regions be more actively involved in the interim milestones associated with certification?**

- One Region should take the lead and make the certification decision.  
 All Regions should be actively involved in the interim milestones of certification.

Comments We believe all Regions should be actively involved. However, it may be necessary to select one Region to be the lead Region responsible for coordinating the formal review process. In that case, the NERC Director of Compliance should select the Region.

**3. Who should certify the Reliability Authority function?**

- Region
- NERC
- RTO
- Independent Team

Comments: Recognizing that the Regions may not be aware of differences between themselves and that the criteria are contained in the SAR, NERC's Technical Committee should develop the criteria through its SAR process in conjunction with a team of stakeholders, the FERC and NAESB for the Regions to follow in certifying the Reliability Authority function to:

- 1) Eliminate the regional differences
- 2) Better adherence to the NERC standards.

**The recommended Review Team consists of a minimum of three individuals selected from at least three of the categories listed below:**

- **Interchange Authority**
- **Balancing Authority**
- **Reliability Authority**
- **Transmission Operator**
- **Regional Compliance Committee member**
- **Regional Operating Committee member**
- **Representative of NERC Staff**
- **Representative from another NERC Region**
- **Representative from an RTO, when applicable**

**In the alternative, the Region may elect, with the applicant agreement, to engage a completely independent review team.**

**4. Do we have the appropriate review team members identified?**

- Yes
- No

Comments: While the appropriate review team members have been identified, we feel that there should be a minimum of 5 members on the team. Also, the NERC Technical Committee should put together such review teams and not the region.

**5. Should a NERC staff person be assigned to each review team?**

Yes

No

Comments NERC staff should be a non-voting member of the review team.

**6. Have we included anything in the certification process that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

Yes

No

Comments:

**7. Have we missed a step in the certification process that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

Comments: Do the existing RAs need to go through this certification process? We suggest that the existing RAs be grandfathered for one or two years to streamline the certification process for the new entities.

***Questions 8-13 address the proposed Criteria included in the SAR.***

**8. Which of the following agreements do you think are necessary? (Check all that you feel should apply)**

An agreement defining responsibilities and authority (during normal and emergency conditions) of the Reliability Authority with respect to

Each adjacent Reliability Authority

Each applicable Balancing Authority

Each applicable Interchange Authority

Each applicable Transmission Operator

Each applicable Transmission Service Provider

Comments:

**9. What other agreements should be required for the Reliability Authority?**

Comments:

**10. Who should be required to sign a confidentiality agreement?**

- Reliability Authorities
- Balancing Authorities
- Interchange Authorities
- Transmission Operators
- Transmission Service Providers

Comments:

**11. Have we included anything in the certification criteria that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

- Yes
- No

Comments:

**12. Have we missed anything in the certification criteria that you think is necessary? If yes, please provide details on what you think should be added.**

- Yes
- No

Comments:

- 1) We think the issue of independence from merchant functions should be specified in the

## **SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

---

organization section rather than just alluded to. Presently, it states "Documentation identifying the code of conduct for personnel performing the Reliability Authority responsibilities." The code of conduct needs to be defined.

2) A physical backup location should be required.

3) Should follow Standards developed by NERC/NAESB to put process/procedures in place for data acquisition, system analysis, and emergency operations.

### **13. If you are aware of any Regional Differences that need to be addressed in this SAR, please highlight them here.**

Regional Difference: There could be differences between three interconnections. However, everything in each interconnection must be done the same way. Standards should be agreed upon by NERC/NAESB for each interconnection.

**14. Other Comments on this Certification SAR:**

Comments: 1. NERC's Technical Committee should establish an audit process, similar to the Reliability Coordinator audits and performance reporting performed today, which would verify a Reliability Authority's compliance to NERC standards. Violations should result in monetary fines

2. These comments are based on the assumption that PJM and MISO will be the RA, IA and BA for the AEP transmission system

3. Newly hired employees for the RA should be allowed to work under the NERC certified supervisors until such new employees have a chance to get certified.

**Procedures currently exist for re-certification of control areas. Considerations are being given for inclusion of re -certification in the certification standards.**

**15. When should re -certification occur?**

Check all that apply

- Periodic
- Significant change in footprint, corporate organization, or operation
- Repetitive Non-Compliance with Reliability Standards
- Flagrant violation of Reliability Standards

**Comments:**

## **SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

*The latest version of this SAR (RA\_CERTIFICATION\_01\_01) is posted on the Standards web site at: <http://www.nerc.com/~filez/sar-approved.html>*

*E-mail this form between December 1–January 10, 2003 to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with “SAR Comments” in the subject line.*

***Please review the SAR and answer the questions in the yellow boxes.***

NOTE: The SAR contains the process for certification, followed by the criteria for certification; the questions in this SAR Comment Form are presented in the same order as the SAR.

*If you have questions, please call Maureen Long at 305-891-5497 or send a question to [spm@nerc.com](mailto:spm@nerc.com).*

### **Background**

The Organization Certification Task Force (OCTF) was formed several months ago to draft certification and registration programs to replace the existing Control Area certification and organization registration processes and procedures.

The OCTF held a series of workshops and posted a White Paper to collect preliminary industry comments on the criteria relevant to the new functional entities and there-by develop new processes and procedures for certifying each of these entities. (All the comments collected during these preliminary steps are posted at <http://www.nerc.com/~filez/octf.html>)

This SAR is one of four SARs being posted simultaneously for comment. These SARs, collectively, identify the certification criteria for the Reliability Authority (RA), Balancing Authority (BA), Interchange Authority (IA) and Transmission Operator (TOP). At this time, these are the only functions being considered for certification. Other functions may be considered for certification in the future. (The functions referred to in this document are the functions identified in the NERC Functional Model. <http://www.nerc.com/~oc/fmrtg.html>)

Certification Criteria are those requirements that an entity must meet to be “Certified” by NERC or another certifying entity such as one of the NERC Regions. NERC Certification is an indication that an organization has the resources in place and the ability to perform a reliability function, such as a Balancing Authority, Interchange Authority, etc. Entities that attain their Certification status must comply with applicable NERC Reliability Standards and criteria. Entities that serve multiple reliability functions may need to attain more than one certification. Where an entity wants multiple certifications, we expect to develop a system whereby that entity could apply for all certifications at one time.

## SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR

<b>SAR Commenter Information</b>	<b>Which Industry Segment do you represent?</b>
Name            Lee .a Gladish	<input type="checkbox"/> Trans Owners <input type="checkbox"/> <b>Brokers, Aggregators, and Marketers</b>
Organization    CWLP	<input type="checkbox"/> RTOs, ISOs, RRCs <input type="checkbox"/> Large Electricity End Users
Telephone        217-757-8520X2103	<input type="checkbox"/> LSEs <input type="checkbox"/> Small Electricity Users
E-mail            lgladish@cwlp.com	<input checked="" type="checkbox"/> TDUs <input type="checkbox"/> <b>Federal, State, and Provincial Regulatory or other Government Entities</b>
	<input type="checkbox"/> Generators

**Questions 1-7 address the proposed Process for certifying Reliability Authority**

**1. Do you agree that there is a reliability-related need to certify the Reliability Authority function?**

- Yes  
 No  
 Neutral

Comments:

**2. When there are multiple regions involved, should one region take the lead and make the certification decision or should all involved regions be more actively involved in the interim milestones associated with certification?**

- One Region should take the lead and make the certification decision.  
 All Regions should be actively involved in the interim milestones of certification.

Comments All regions should work in one unison effort to avoid duplication of effort

**3. Who should certify the Reliability Authority function?**

- Region
- NERC
- RTO
- Independent Team

Comments: NERC issue certifications on the recommendation of the Regions.

**The recommended Review Team consists of a minimum of three individuals selected from at least three of the categories listed below:**

- **Interchange Authority**
- **Balancing Authority**
- **Reliability Authority**
- **Transmission Operator**
- **Regional Compliance Committee member**
- **Regional Operating Committee member**
- **Representative of NERC Staff**
- **Representative from another NERC Region**
- **Representative from an RTO, when applicable**

**In the alternative, the Region may elect, with the applicant agreement, to engage a completely independent review team.**

**4. Do we have the appropriate review team members identified?**

- Yes
- No

Comments: A mandatory "outsider" should be on the review team, such as a rep from NERC staff, or another Region.

**5. Should a NERC staff person be assigned to each review team?**

- Yes
- No

Comments See comments to #4. Just so an outsider is involved.



**6. Have we included anything in the certification process that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

Yes

No

Comments:

**7. Have we missed a step in the certification process that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

Comments: Certification of personnel should include the requirement of the "appropriate" certification. IE: There are now multiple credentials, and the RA must have Personnel with RA credentials.

**Questions 8-13 address the proposed Criteria included in the SAR.**

**8. Which of the following agreements do you think are necessary? (Check all that you feel should apply)**

An agreement defining responsibilities and authority (during normal and emergency conditions) of the Reliability Authority with respect to

Each adjacent Reliability Authority

Each applicable Balancing Authority

Each applicable Interchange Authority

Each applicable Transmission Operator

Each applicable Transmission Service Provider

Comments:

**9. What other agreements should be required for the Reliability Authority?**

Comments:

**10. Who should be required to sign a confidentiality agreement?**

- Reliability Authorities
- Balancing Authorities
- Interchange Authorities
- Transmission Operators
- Transmission Service Providers

Comments:

**11. Have we included anything in the certification criteria that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

- Yes
- No

Comments:

**12. Have we missed anything in the certification criteria that you think is necessary? If yes, please provide details on what you think should be added.**

- Yes
- No

Comments: Same as answer to #7

**13. If you are aware of any Regional Differences that need to be addressed in this SAR, please highlight them here.**

Regional Difference:



**14. Other Comments on this Certification SAR:**

Comments:

**Procedures currently exist for re-certification of control areas. Considerations are being given for inclusion of re -certification in the certification standards.**

**15. When should re -certification occur?**

Check all that apply

- Periodic
- Significant change in footprint, corporate organization, or operation
- Repetitive Non-Compliance with Reliability Standards
- Flagrant violation of Reliability Standards

**Comments:**

## **SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

*The latest version of this SAR (RA\_CERTIFICATION\_01\_01) is posted on the Standards web site at: <http://www.nerc.com/~filez/sar-approved.html>*

*E-mail this form between December 1–January 10, 2003 to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with “SAR Comments” in the subject line.*

***Please review the SAR and answer the questions in the yellow boxes.***

NOTE: The SAR contains the process for certification, followed by the criteria for certification; the questions in this SAR Comment Form are presented in the same order as the SAR.

*If you have questions, please call Maureen Long at 305-891-5497 or send a question to [spm@nerc.com](mailto:spm@nerc.com).*

### **Background**

The Organization Certification Task Force (OCTF) was formed several months ago to draft certification and registration programs to replace the existing Control Area certification and organization registration processes and procedures.

The OCTF held a series of workshops and posted a White Paper to collect preliminary industry comments on the criteria relevant to the new functional entities and there-by develop new processes and procedures for certifying each of these entities. (All the comments collected during these preliminary steps are posted at <http://www.nerc.com/~filez/octf.html>)

This SAR is one of four SARs being posted simultaneously for comment. These SARs, collectively, identify the certification criteria for the Reliability Authority (RA), Balancing Authority (BA), Interchange Authority (IA) and Transmission Operator (TOP). At this time, these are the only functions being considered for certification. Other functions may be considered for certification in the future. (The functions referred to in this document are the functions identified in the NERC Functional Model. <http://www.nerc.com/~oc/fmrtg.html>)

Certification Criteria are those requirements that an entity must meet to be “Certified” by NERC or another certifying entity such as one of the NERC Regions. NERC Certification is an indication that an organization has the resources in place and the ability to perform a reliability function, such as a Balancing Authority, Interchange Authority, etc. Entities that attain their Certification status must comply with applicable NERC Reliability Standards and criteria. Entities that serve multiple reliability functions may need to attain more than one certification. Where an entity wants multiple certifications, we expect to develop a system whereby that entity could apply for all certifications at one time.

**SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

---

<b>SAR Commenter Information</b>		<b>Which Industry Segment do you represent?</b>	
Name	Roman Carter on behalf of Tony Reed	<input checked="" type="checkbox"/> Trans Owners	<input checked="" type="checkbox"/> <b>Brokers, Aggregators, and Marketers</b>
Organization	Southern Co. Generation and Energy Marketing	<input type="checkbox"/> RTOs, ISOs, RRCs	<input type="checkbox"/> Large Electricity End Users
Telephone	205.257.6027	<input checked="" type="checkbox"/> LSEs	<input type="checkbox"/> Small Electricity Users
E-mail	jrcarter@southernco.com	<input type="checkbox"/> TDUs	<input type="checkbox"/> <b>Federal, State, and Provincial Regulatory or other Government Entities</b>
		<input checked="" type="checkbox"/> Generators	

**Questions 1-7 address the proposed Process for certifying Reliability Authority**

**1. Do you agree that there is a reliability-related need to certify the Reliability Authority function?**

Yes  
 No  
 Neutral

Comments:

**2. When there are multiple regions involved, should one region take the lead and make the certification decision or should all involved regions be more actively involved in the interim milestones associated with certification?**

One Region should take the lead and make the certification decision.  
 All Regions should be actively involved in the interim milestones of certification.

Comments The Region in which the Reliability Authority primarily resides and does business should have the lead role in the certification process. It would make the formal recommendation for certification or not certification with applicable justifications. All affected Regions should be involved and be allowed to provide input. Further, it is recommended that participation from the Generator sector be included in this process.

**3. Who should certify the Reliability Authority function?**

- Region
- NERC
- RTO
- Independent Team

Comments: Each region should already have the fundamental structure/organization, collective expertise, reliability knowledge and experience, and representation (including a presence from the Generation sector) among its members to handle this appropriately.

**The recommended Review Team consists of a minimum of three individuals selected from at least three of the categories listed below:**

- **Interchange Authority**
- **Balancing Authority**
- **Reliability Authority**
- **Transmission Operator**
- **Regional Compliance Committee member**
- **Regional Operating Committee member**
- **Representative of NERC Staff**
- **Representative from another NERC Region**
- **Representative from an RTO, when applicable**

**In the alternative, the Region may elect, with the applicant agreement, to engage a completely independent review team.**

**4. Do we have the appropriate review team members identified?**

- Yes
- No

Comments: The Review Team above is heavily weighted with Reliability function entities. The review team should have representation from the Generation sector in each of the affected Regions. Actions and decisions made by the Reliability Authority could have direct and indirect impacts on the Generators.

**5. Should a NERC staff person be assigned to each review team?**

- Yes

## SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR

---

No

Comments While regions are taking the lead role with the certification process, having a NERC staff person involved to help facilitate the process should help complete the process more quickly and avoid certain pitfalls..

**6. Have we included anything in the certification process that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

Yes

No

Comments: As the standard itself is being developed, the industry may identify additional elements or details that would enhance or streamline the process. Therefore, provisions should be made in the SAR to permit enhancing or streamlining the certification process during development of the standard itself.

**7. Have we missed a step in the certification process that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

Comments: However, as the standard itself is being developed, the industry may identify additional elements or details that would enhance or streamline the process. Therefore, provisions should be made in the SAR to permit enhancing or streamlining the certification process during development of the standard itself.

**Questions 8-13 address the proposed Criteria included in the SAR.**

**8. Which of the following agreements do you think are necessary? (Check all that you feel should apply)**

An agreement defining responsibilities and authority (during normal and emergency conditions) of the Reliability Authority with respect to

Each adjacent Reliability Authority

Each applicable Balancing Authority

Each applicable Interchange Authority

Each applicable Transmission Operator

- Each applicable Transmission Service Provider

Comments: It is important that the Authorities have sufficient arrangements (e.g. agreements) in place to carry out its duties and to support the other certified Authorities. However, we do not believe that agreements defining their authority is necessary in the SAR stage. We do agree that the Reliability Authority candidate should have the necessary elements prepared to initiate the agreements once certified.

**9. What other agreements should be required for the Reliability Authority?**

Comments: Once a Reliability Authority becomes certified, it should include agreements defining responsibilities and authority (during normal and emergency conditions) with respect to Generators. This would include nuclear plants because they not only generate power to the grid, they also rely on the grid as their preferred power source for safe shutdown equipment.

**10. Who should be required to sign a confidentiality agreement?**

- Reliability Authorities  
 Balancing Authorities  
 Interchange Authorities  
 Transmission Operators  
 Transmission Service Providers

Comments: Without knowing details of the confidentiality agreement and whether it would prevent an entity from performing other economic generator-related functions, it is unclear whether a Balancing Authority should be required to sign.

**11. Have we included anything in the certification criteria that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

- Yes  
 No

Comments: Generally, the structure of a SAR is at a high level overview. The SAR, as written, would include specific details normally provided by the Standards Drafting Team in the Standards process. Including these details in the SAR will restrict the Standards Drafting Team and their flexibility to draft the Standard. Therefore, the SAR should identify the boundaries and the "must haves" only, and leave the specific details to the Standard Drafting Team..

Would like clarification on the criteria in 4.3 "Documentation identifying the code of conduct for personnel performing the Balancing Authority responsibilities". What type of documentation?



**12. Have we missed anything in the certification criteria that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

Comments: Section 5 titled Data Acquisition and System Analysis: Need to add "5.12 Process/Procedures in place for evaluation of Reliability activities on generating plants and notification to generator operators". For example, transmission line outages can directly or indirectly affect generating plants. Nuclear plants may have to be notified of certain line outages so they can evaluate the impacts of the outages on the operability of the grid (their "preferred power source" to safe shutdown equipment) and the plant. Appropriate notifications must be made to nuclear plant operators and appropriate operational studies and contingency analyses of the nuclear plant offsite power source may have to be performed.

**13. If you are aware of any Regional Differences that need to be addressed in this SAR, please highlight them here.**

Regional Difference:

**14. Other Comments on this Certification SAR:**

Comments: SAR Scope and Detail- Much detail is included in the SAR that should be reserved for development within the standard itself. For example, the SAR should only outline key elements that should be included in the certification process, and should not try to define specific steps. Otherwise, provisions should be made in the SAR to permit revision to the certification process and criteria during development fo the standard itself.

**Procedures currently exist for re-certification of control areas. Considerations are being given for inclusion of re -certification in the certification standards.**

**15. When should re -certification occur?**

Check all that apply

- Periodic
- Significant change in footprint, corporate organization, or operation
- Repetitive Non-Compliance with Reliability Standards
- Flagrant violation of Reliability Standards

**Comments:** Periodic re-certification should take place no sooner than every 3 years.

## **SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

*The latest version of this SAR (RA\_CERTIFICATION\_01\_01) is posted on the Standards web site at: <http://www.nerc.com/~filez/sar-approved.html>*

*E-mail this form between December 1–January 10, 2003 to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with “SAR Comments” in the subject line.*

***Please review the SAR and answer the questions in the yellow boxes.***

NOTE: The SAR contains the process for certification, followed by the criteria for certification; the questions in this SAR Comment Form are presented in the same order as the SAR.

*If you have questions, please call Maureen Long at 305-891-5497 or send a question to [spm@nerc.com](mailto:spm@nerc.com).*

### **Background**

The Organization Certification Task Force (OCTF) was formed several months ago to draft certification and registration programs to replace the existing Control Area certification and organization registration processes and procedures.

The OCTF held a series of workshops and posted a White Paper to collect preliminary industry comments on the criteria relevant to the new functional entities and there-by develop new processes and procedures for certifying each of these entities. (All the comments collected during these preliminary steps are posted at <http://www.nerc.com/~filez/octf.html>)

This SAR is one of four SARs being posted simultaneously for comment. These SARs, collectively, identify the certification criteria for the Reliability Authority (RA), Balancing Authority (BA), Interchange Authority (IA) and Transmission Operator (TOP). At this time, these are the only functions being considered for certification. Other functions may be considered for certification in the future. (The functions referred to in this document are the functions identified in the NERC Functional Model. <http://www.nerc.com/~oc/fmrtg.html>)

Certification Criteria are those requirements that an entity must meet to be “Certified” by NERC or another certifying entity such as one of the NERC Regions. NERC Certification is an indication that an organization has the resources in place and the ability to perform a reliability function, such as a Balancing Authority, Interchange Authority, etc. Entities that attain their Certification status must comply with applicable NERC Reliability Standards and criteria. Entities that serve multiple reliability functions may need to attain more than one certification. Where an entity wants multiple certifications, we expect to develop a system whereby that entity could apply for all certifications at one time.

## SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR

SAR Commenter Information		Which Industry Segment do you represent?	
Name	Kathleen Goodman	<input type="checkbox"/> Trans Owners	<input type="checkbox"/> <b>Brokers, Aggregators, and Marketers</b>
Organization	ISO New England Inc	<input checked="" type="checkbox"/> RTOs, ISOs, RRCs	<input type="checkbox"/> Large Electricity End Users
Telephone	(413) 535-4111	<input type="checkbox"/> LSEs	<input type="checkbox"/> Small Electricity Users
E-mail	kgoodman@iso-ne.com	<input type="checkbox"/> TDUs	<input type="checkbox"/> <b>Federal, State, and Provincial Regulatory or other Government Entities</b>
		<input type="checkbox"/> Generators	

**Questions 1-7 address the proposed Process for certifying Reliability Authority**

**1. Do you agree that there is a reliability-related need to certify the Reliability Authority function?**

- Yes  
 No  
 Neutral

Comments: While I agree there is a need to certify certain functions, such as Control Area functions, I do not agree that the existing entities that have been performing these functions for several years need to be recertified under the new model unless the requirements have changed, which I don't think is the case.

**2. When there are multiple regions involved, should one region take the lead and make the certification decision or should all involved regions be more actively involved in the interim milestones associated with certification?**

- One Region should take the lead and make the certification decision.  
 All Regions should be actively involved in the interim milestones of certification.

Comments

**3. Who should certify the Reliability Authority function?**

- Region
- NERC
- RTO
- Independent Team

Comments:

**The recommended Review Team consists of a minimum of three individuals selected from at least three of the categories listed below:**

- **Interchange Authority**
- **Balancing Authority**
- **Reliability Authority**
- **Transmission Operator**
- **Regional Compliance Committee member**
- **Regional Operating Committee member**
- **Representative of NERC Staff**
- **Representative from another NERC Region**
- **Representative from an RTO, when applicable**

**In the alternative, the Region may elect, with the applicant agreement, to engage a completely independent review team.**

**4. Do we have the appropriate review team members identified?**

- Yes
- No

Comments: Should exercise caution when selecting review team members. Having members who perform merchant functions on the team, which is the current practice, could be a violation of the Applicant's code of conduct.

**5. Should a NERC staff person be assigned to each review team?**

- Yes
- No

Comments Only if NERC staff members are available to participate, but the reviews should not

**SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

---

be dependant on this.

**6. Have we included anything in the certification process that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

Yes

No

Comments:

**7. Have we missed a step in the certification process that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

Comments: Who will be responsible for ensuring that all areas have a RA/RC oversight and how will this process be handled?

**Questions 8-13 address the proposed Criteria included in the SAR.**

**8. Which of the following agreements do you think are necessary? (Check all that you feel should apply)**

An agreement defining responsibilities and authority (during normal and emergency conditions) of the Reliability Authority with respect to

Each adjacent Reliability Authority

Each applicable Balancing Authority

Each applicable Interchange Authority

Each applicable Transmission Operator

Each applicable Transmission Service Provider

Comments:

**9. What other agreements should be required for the Reliability Authority?**

Comments:

**10. Who should be required to sign a confidentiality agreement?**

- Reliability Authorities
- Balancing Authorities
- Interchange Authorities
- Transmission Operators
- Transmission Service Providers

Comments: Entities requiring appropriate conduct likely already bound by FERC Order 888 / 889. This is a duplicative effort and should not be included.

**11. Have we included anything in the certification criteria that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

- Yes
- No

Comments: See answer to Item 10.

**12. Have we missed anything in the certification criteria that you think is necessary? If yes, please provide details on what you think should be added.**

- Yes
- No

Comments: Having a process/procedure in place does not ensure that the reliability requirements are being fulfilled.

**13. If you are aware of any Regional Differences that need to be addressed in this SAR, please highlight them here.**

Regional Difference:

**SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

---



**14. Other Comments on this Certification SAR:**

Comments:

**Procedures currently exist for re-certification of control areas. Considerations are being given for inclusion of re -certification in the certification standards.**

**15. When should re -certification occur?**

Check all that apply

- Periodic
- Significant change in footprint, corporate organization, or operation
- Repetitive Non-Compliance with Reliability Standards
- Flagrant violation of Reliability Standards

**Comments:** Periodic should be something like 5 years.

## SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR

The latest version of this SAR (RA\_CERTIFICATION\_01\_01) is posted on the Standards web site at:  
<http://www.nerc.com/~filez/sar-approved.html>

E-mail this form between December 1–January 10, 2003 to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with “SAR Comments” in the subject line.

**Please review the SAR and answer the questions in the yellow boxes.**

NOTE: The SAR contains the process for certification, followed by the criteria for certification; the questions in this SAR Comment Form are presented in the same order as the SAR.

If you have questions, please call Maureen Long at 305-891-5497 or send a question to [spm@nerc.com](mailto:spm@nerc.com).

### Background

The Organization Certification Task Force (OCTF) was formed several months ago to draft certification and registration programs to replace the existing Control Area certification and organization registration processes and procedures.

The OCTF held a series of workshops and posted a White Paper to collect preliminary industry comments on the criteria relevant to the new functional entities and there-by develop new processes and procedures for certifying each of these entities. (All the comments collected during these preliminary steps are posted at <http://www.nerc.com/~filez/octf.html>)

This SAR is one of four SARs being posted simultaneously for comment. These SARs, collectively, identify the certification criteria for the Reliability Authority (RA), Balancing Authority (BA), Interchange Authority (IA) and Transmission Operator (TOP). At this time, these are the only functions being considered for certification. Other functions may be considered for certification in the future. (The functions referred to in this document are the functions identified in the NERC Functional Model. <http://www.nerc.com/~oc/fmrtg.html>)

Certification Criteria are those requirements that an entity must meet to be “Certified” by NERC or another certifying entity such as one of the NERC Regions. NERC Certification is an indication that an organization has the resources in place and the ability to perform a reliability function, such as a Balancing Authority, Interchange Authority, etc. Entities that attain their Certification status must comply with applicable NERC Reliability Standards and criteria. Entities that serve multiple reliability functions may need to attain more than one certification. Where an entity wants multiple certifications, we expect to develop a system whereby that entity could apply for all certifications at one time.

SAR Commenter Information		Which Industry Segment do you represent?	
Name	Martin Boisvert	<input checked="" type="checkbox"/> Trans Owners	<input type="checkbox"/> Brokers, Aggregators, and Marketers
Organization	HQ <i>TransÉnergie</i>	<input type="checkbox"/> RTOs, ISOs, RRCs	<input type="checkbox"/> Large Electricity End Users
Telephone	514-289-2211 ext.3870	<input type="checkbox"/> LSEs	<input type="checkbox"/> Small Electricity Users
E-mail	Boisvert.Martin@hydro.qc.ca	<input type="checkbox"/> TDUs	<input type="checkbox"/> Federal, State, and Provincial Regulatory or other Government Entities
		<input type="checkbox"/> Generators	

**Questions 1-7 address the proposed Process for certifying Reliability Authority**

**1. Do you agree that there is a reliability-related need to certify the Reliability Authority function?**

Yes  
 No  
 Neutral

Comments: *It is not essential to certify the function as long as the individuals who are performing the RA, BA, IA responsibilities, i.e. those who have the authority to apply the criteria, are each NERC certified.*

**2. When there are multiple regions involved, should one region take the lead and make the certification decision or should all involved regions be more actively involved in the interim milestones associated with certification?**

One Region should take the lead and make the certification decision.  
 All Regions should be actively involved in the interim milestones of certification.

Comments

**SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

**3. Who should certify the Reliability Authority function?**

- Region
- NERC
- RTO
- Independent Team

Comments:

**The recommended Review Team consists of a minimum of three individuals selected from at least three of the categories listed below:**

- **Interchange Authority**
- **Balancing Authority**
- **Reliability Authority**
- **Transmission Operator**
- **Regional Compliance Committee member**
- **Regional Operating Committee member**
- **Representative of NERC Staff**
- **Representative from another NERC Region**
- **Representative from an RTO, when applicable**

**In the alternative, the Region may elect, with the applicant agreement, to engage a completely independent review team.**

**4. Do we have the appropriate review team members identified?**

- Yes
- No

Comments:

**5. Should a NERC staff person be assigned to each review team?**

- Yes
- No

Comments

**6. Have we included anything in the certification process that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

- Yes
  - No
- Comments:

**7. Have we missed a step in the certification process that you think is necessary? If yes, please provide details on what you think should be added.**

- Yes
  - No
- Comments:

*Questions 8-13 address the proposed Criteria included in the SAR*

**8. Which of the following agreements do you think are necessary? (Check all that you feel should apply)**

An agreement defining responsibilities and authority (during normal and emergency conditions) of the Reliability Authority with respect to

- Each adjacent Reliability Authority
- Each applicable Balancing Authority
- Each applicable Interchange Authority
- Each applicable Transmission Operator
- Each applicable Transmission Service Provider

**SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

Comments:

**9. What other agreements should be required for the Reliability Authority?**

Comments: *Applicable Generators and applicable Distribution Providers (load shedding, public appeal)*

**10. Who should be required to sign a confidentiality agreement?**

- Reliability Authorities
- Balancing Authorities
- Interchange Authorities
- Transmission Operators
- Transmission Service Providers

Comments:

**11. Have we included anything in the certification criteria that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

- Yes                       No                      Comments:

**12. Have we missed anything in the certification criteria that you think is necessary? If yes, please provide details on what you think should be added.**

- Yes                       No                      Comments:

**13. If you are aware of any Regional Differences that need to be addressed in this SAR, please highlight them here.**

Regional Difference:

**14. Other Comments on this Certification SAR:**

Comments: *Should refer to Reliability **Coordinator**.  
Those who should be certified are the individuals and not the function.*

**Procedures currently exist for re-certification of control areas. Considerations are being given for inclusion of re -certification in the certification standards.**

**15. When should re -certification occur?**

Check all that apply

- Periodic
- Significant change in footprint, corporate organization, or operation
- Repetitive Non-Compliance with Reliability Standards
- Flagrant violation of Reliability Standards

**Comments:**

## **SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

*The latest version of this SAR (RA\_CERTIFICATION\_01\_01) is posted on the Standards web site at: <http://www.nerc.com/~filez/sar-approved.html>*

*E-mail this form between December 1–January 10, 2003 to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with “SAR Comments” in the subject line.*

***Please review the SAR and answer the questions in the yellow boxes.***

NOTE: The SAR contains the process for certification, followed by the criteria for certification; the questions in this SAR Comment Form are presented in the same order as the SAR.

*If you have questions, please call Maureen Long at 305-891-5497 or send a question to [spm@nerc.com](mailto:spm@nerc.com).*

### **Background**

The Organization Certification Task Force (OCTF) was formed several months ago to draft certification and registration programs to replace the existing Control Area certification and organization registration processes and procedures.

The OCTF held a series of workshops and posted a White Paper to collect preliminary industry comments on the criteria relevant to the new functional entities and there-by develop new processes and procedures for certifying each of these entities. (All the comments collected during these preliminary steps are posted at <http://www.nerc.com/~filez/octf.html>)

This SAR is one of four SARs being posted simultaneously for comment. These SARs, collectively, identify the certification criteria for the Reliability Authority (RA), Balancing Authority (BA), Interchange Authority (IA) and Transmission Operator (TOP). At this time, these are the only functions being considered for certification. Other functions may be considered for certification in the future. (The functions referred to in this document are the functions identified in the NERC Functional Model. <http://www.nerc.com/~oc/fmrtg.html>)

Certification Criteria are those requirements that an entity must meet to be “Certified” by NERC or another certifying entity such as one of the NERC Regions. NERC Certification is an indication that an organization has the resources in place and the ability to perform a reliability function, such as a Balancing Authority, Interchange Authority, etc. Entities that attain their Certification status must comply with applicable NERC Reliability Standards and criteria. Entities that serve multiple reliability functions may need to attain more than one certification. Where an entity wants multiple certifications, we expect to develop a system whereby that entity could apply for all certifications at one time.

**SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

<b>SAR Commenter Information</b>		<b>Which Industry Segment do you represent?</b>	
Name	Peter Burke [submitting responses for ATC's Alan Staats and Bobbi Welch]	<input checked="" type="checkbox"/> Trans Owners	<input type="checkbox"/> <b>Brokers, Aggregators, and Marketers</b>
Organization	American Transmission Company	<input type="checkbox"/> RTOs, ISOs, RRCs	<input type="checkbox"/> Large Electricity End Users
Telephone	262-506-6863	<input type="checkbox"/> LSEs	<input type="checkbox"/> Small Electricity Users
E-mail	PBurke@atcllc.com	<input type="checkbox"/> TDUs	<input type="checkbox"/> <b>Federal, State, and Provincial Regulatory or other Government Entities</b>
		<input type="checkbox"/> Generators	

**Questions 1-7 address the proposed Process for certifying Reliability Authority**

**1. Do you agree that there is a reliability-related need to certify the Reliability Authority function?**

Yes  
 No  
 Neutral

Comments:

**2. When there are multiple regions involved, should one region take the lead and make the certification decision or should all involved regions be more actively involved in the interim milestones associated with certification?**

One Region should take the lead and make the certification decision.  
 All Regions should be actively involved in the interim milestones of certification.

Comments If multiple Regions are involved, we believe that at least one representative from each Region should be involved in the certification process, perhaps in the make-up of a single team. Our concern with having multiple Regions involved in separate evaluation processes is that it introduces additional layers of approvals and has the potential to introduce conflicting certification criteria if there are differing requirements between Regions. In addition, the time commitment involved in receiving certification could increase dramatically. Alternatively, having one Region as the lead Region responsible for certifying a large Reliability Authority with a major presence in several Regions, such as the MISO, undercuts the ability of the other involved, non-lead Regions to provide adequate input into the process. Therefore, we feel that each Region should be represented equally/adequately. Finally, it would help solve the bias problem if NERC were the

**SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

---

lead body in the certification process when multiple Regions are involved.

**3. Who should certify the Reliability Authority function?**

- Region
- NERC
- RTO
- Independent Team

Comments:

**The recommended Review Team consists of a minimum of three individuals selected from at least three of the categories listed below:**

- **Interchange Authority**
- **Balancing Authority**
- **Reliability Authority**
- **Transmission Operator**
- **Regional Compliance Committee member**
- **Regional Operating Committee member**
- **Representative of NERC Staff**
- **Representative from another NERC Region**
- **Representative from an RTO, when applicable**

**In the alternative, the Region may elect, with the applicant agreement, to engage a completely independent review team.**

**4. Do we have the appropriate review team members identified?**

- Yes
- No

Comments: Our concern here is that, if you are allowing the Review Team to be as small as three individuals, then certain of the categories should take precedence over other(s) and be required in the formation of a Review Team. For example, we would like to see that a certified Reliability Authority be involved in the certification of another Reliability Authority. It does not make sense that a three person team made up of a Balancing Authority, an Interchange Authority, and a Transmission Operator, would have the necessary expertise to certify a Reliability Authority.

**5. Should a NERC staff person be assigned to each review team?**

- Yes

**SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

---

No

Comments To the extent that multiple Regions are involved, a NERC staff person should be involved to ensure consistency.

**6. Have we included anything in the certification process that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

Yes

No

Comments:

**7. Have we missed a step in the certification process that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

Comments:

**Questions 8-13 address the proposed Criteria included in the SAR.**

**8. Which of the following agreements do you think are necessary? (Check all that you feel should apply)**

An agreement defining responsibilities and authority (during normal and emergency conditions) of the Reliability Authority with respect to

Each adjacent Reliability Authority

Each applicable Balancing Authority

Each applicable Interchange Authority

Each applicable Transmission Operator

Each applicable Transmission Service Provider

Comments:

**9. What other agreements should be required for the Reliability Authority?**

Comments: We feel that this is important due to the interconnected nature of the electrical system.

**10. Who should be required to sign a confidentiality agreement?**

- Reliability Authorities
- Balancing Authorities
- Interchange Authorities
- Transmission Operators
- Transmission Service Providers

Comments: Any party having access to confidential transmission information.

**11. Have we included anything in the certification criteria that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

- Yes
- No

Comments:

**12. Have we missed anything in the certification criteria that you think is necessary? If yes, please provide details on what you think should be added.**

- Yes
- No

Comments:

**13. If you are aware of any Regional Differences that need to be addressed in this SAR, please highlight them here.**

**SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

---

Regional Difference:

**14. Other Comments on this Certification SAR:**

Comments:

**Procedures currently exist for re-certification of control areas. Considerations are being given for inclusion of re -certification in the certification standards.**

**15. When should re -certification occur?**

Check all that apply

- Periodic
- Significant change in footprint, corporate organization, or operation
- Repetitive Non-Compliance with Reliability Standards
- Flagrant violation of Reliability Standards

**Comments:**

## **SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

*The latest version of this SAR (RA\_CERTIFICATION\_01\_01) is posted on the Standards web site at: <http://www.nerc.com/~filez/sar-approved.html>*

*E-mail this form between December 1–January 10, 2003 to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with “SAR Comments” in the subject line.*

***Please review the SAR and answer the questions in the yellow boxes.***

NOTE: The SAR contains the process for certification, followed by the criteria for certification; the questions in this SAR Comment Form are presented in the same order as the SAR.

*If you have questions, please call Maureen Long at 305-891-5497 or send a question to [spm@nerc.com](mailto:spm@nerc.com).*

### **Background**

The Organization Certification Task Force (OCTF) was formed several months ago to draft certification and registration programs to replace the existing Control Area certification and organization registration processes and procedures.

The OCTF held a series of workshops and posted a White Paper to collect preliminary industry comments on the criteria relevant to the new functional entities and there-by develop new processes and procedures for certifying each of these entities. (All the comments collected during these preliminary steps are posted at <http://www.nerc.com/~filez/octf.html>)

This SAR is one of four SARs being posted simultaneously for comment. These SARs, collectively, identify the certification criteria for the Reliability Authority (RA), Balancing Authority (BA), Interchange Authority (IA) and Transmission Operator (TOP). At this time, these are the only functions being considered for certification. Other functions may be considered for certification in the future. (The functions referred to in this document are the functions identified in the NERC Functional Model. <http://www.nerc.com/~oc/fmrtg.html>)

Certification Criteria are those requirements that an entity must meet to be “Certified” by NERC or another certifying entity such as one of the NERC Regions. NERC Certification is an indication that an organization has the resources in place and the ability to perform a reliability function, such as a Balancing Authority, Interchange Authority, etc. Entities that attain their Certification status must comply with applicable NERC Reliability Standards and criteria. Entities that serve multiple reliability functions may need to attain more than one certification. Where an entity wants multiple certifications, we expect to develop a system whereby that entity could apply for all certifications at one time.

## SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR

SAR Commenter Information		Which Industry Segment do you represent?	
Name	Albert DiCaprio	<input type="checkbox"/> Trans Owners	<input type="checkbox"/> Brokers, Aggregators, and Marketers
Organization	MAAC	<input checked="" type="checkbox"/> RTOs, ISOs, RRCs	<input type="checkbox"/> Large Electricity End Users
Telephone	610-666-8854	<input type="checkbox"/> LSEs	<input type="checkbox"/> Small Electricity Users
E-mail	dicapram@pjm.com	<input type="checkbox"/> TDUs	<input type="checkbox"/> Federal, State, and Provincial Regulatory or other Government Entities
		<input type="checkbox"/> Generators	

**Questions 1-7 address the proposed Process for certifying Reliability Authority**

**1. Do you agree that there is a reliability-related need to certify the Reliability Authority function?**

- Yes  
 No  
 Neutral

Comments: It is imperative that the entity that serves as an RA have all of the tools necessary to carry out wide-area reliability analysis, as well as have the authority to carry out emergency load shedding as a means of preventing interregional cascading or instability.

**2. When there are multiple regions involved, should one region take the lead and make the certification decision or should all involved regions be more actively involved in the interim milestones associated with certification?**

- One Region should take the lead and make the certification decision.  
 All Regions should be actively involved in the interim milestones of certification.

Comments An RA that spans more than one Regional Council must be responsible for adhering to all of the standards that apply to it - no matter who created the standard. The standard may only be 'locally' applied (i.e. in the affected geographic area) but it must be applied.

**3. Who should certify the Reliability Authority function?**

- Region
- NERC
- RTO
- Independent Team

Comments: Whichever organization is responsible for maintaining reliability, that organization should be responsible for certifying those entities that will be operating under their respective requirements. nerc should provide a default certification process that can be used if the Region so desires (like the control area certification used today). In this way there is less of a chance that nerc could 'certify' an entity but that entity would not have the tools to operate within the given region.

**The recommended Review Team consists of a minimum of three individuals selected from at least three of the categories listed below:**

- **Interchange Authority**
- **Balancing Authority**
- **Reliability Authority**
- **Transmission Operator**
- **Regional Compliance Committee member**
- **Regional Operating Committee member**
- **Representative of NERC Staff**
- **Representative from another NERC Region**
- **Representative from an RTO, when applicable**

**In the alternative, the Region may elect, with the applicant agreement, to engage a completely independent review team.**

**4. Do we have the appropriate review team members identified?**

- Yes
- No

Comments:

**5. Should a NERC staff person be assigned to each review team?**

- Yes

## SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR

No

Comments There is a need that nerc staff provide a high level coordination function and review that cannot be carried out by any other group. An informed independent organization is needed and nerc staff fills that role.

**6. Have we included anything in the certification process that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

Yes

No

Comments: Revise Step 6 of the Process and delete reference to IDC. There is no need to memorialize any give tool that may or may not be required in the future. It is suggested that the step be changed to read:

" nerc staff will begin the process by making appropriate changes to all applicable tools and databases associated with the RA. The Applicant and the Region will begin supply the necessary links and data to support those tools and databases.All revisions will be placed on hold until the entity is certified"

**7. Have we missed a step in the certification process that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

Comments:

**Questions 8-13 address the proposed Criteria included in the SAR.**

**8. Which of the following agreements do you think are necessary? (Check all that you feel should apply)**

An agreement defining responsibilities and authority (during normal and emergency conditions) of the Reliability Authority with respect to

Each adjacent Reliability Authority

Each applicable Balancing Authority

Each applicable Interchange Authority

Each applicable Transmission Operator

## SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR

- Each applicable Transmission Service Provider

Comments: The RA should have formal agreements with all of the entities that provide reliability services. These agreements should recognize the RA as the final authority in its area, and should lay out the rules for dealing with other RAs during such emergencies.

### 9. What other agreements should be required for the Reliability Authority?

Comments:

### 10. Who should be required to sign a confidentiality agreement?

- Reliability Authorities  
 Balancing Authorities  
 Interchange Authorities  
 Transmission Operators  
 Transmission Service Providers

Comments:

### 11. Have we included anything in the certification criteria that you think is unnecessary? If yes, please provide details on what you think we should eliminate.

- Yes  
 No

Comments: see comment on "tools / IDC" above.

### 12. Have we missed anything in the certification criteria that you think is necessary? If yes, please provide details on what you think should be added.

- Yes  
 No

Comments:

**13. If you are aware of any Regional Differences that need to be addressed in this SAR, please highlight them here.**

Regional Difference: No

**14. Other Comments on this Certification SAR:**

Comments:

**Procedures currently exist for re-certification of control areas. Considerations are being given for inclusion of re -certification in the certification standards.**

**15. When should re -certification occur?**

Check all that apply

- Periodic
- Significant change in footprint, corporate organization, or operation
- Repetitive Non-Compliance with Reliability Standards
- Flagrant violation of Reliability Standards

**Comments:**

## **SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

*The latest version of this SAR (RA\_CERTIFICATION\_01\_01) is posted on the Standards web site at: <http://www.nerc.com/~filez/sar-approved.html>*

*E-mail this form between December 1–January 10, 2003 to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with “SAR Comments” in the subject line.*

***Please review the SAR and answer the questions in the yellow boxes.***

NOTE: The SAR contains the process for certification, followed by the criteria for certification; the questions in this SAR Comment Form are presented in the same order as the SAR.

*If you have questions, please call Maureen Long at 305-891-5497 or send a question to [spm@nerc.com](mailto:spm@nerc.com).*

### **Background**

The Organization Certification Task Force (OCTF) was formed several months ago to draft certification and registration programs to replace the existing Control Area certification and organization registration processes and procedures.

The OCTF held a series of workshops and posted a White Paper to collect preliminary industry comments on the criteria relevant to the new functional entities and there-by develop new processes and procedures for certifying each of these entities. (All the comments collected during these preliminary steps are posted at <http://www.nerc.com/~filez/octf.html>)

This SAR is one of four SARs being posted simultaneously for comment. These SARs, collectively, identify the certification criteria for the Reliability Authority (RA), Balancing Authority (BA), Interchange Authority (IA) and Transmission Operator (TOP). At this time, these are the only functions being considered for certification. Other functions may be considered for certification in the future. (The functions referred to in this document are the functions identified in the NERC Functional Model. <http://www.nerc.com/~oc/fmrtg.html>)

Certification Criteria are those requirements that an entity must meet to be “Certified” by NERC or another certifying entity such as one of the NERC Regions. NERC Certification is an indication that an organization has the resources in place and the ability to perform a reliability function, such as a Balancing Authority, Interchange Authority, etc. Entities that attain their Certification status must comply with applicable NERC Reliability Standards and criteria. Entities that serve multiple reliability functions may need to attain more than one certification. Where an entity wants multiple certifications, we expect to develop a system whereby that entity could apply for all certifications at one time.

**SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

<b>SAR Commenter Information</b>	<b>Which Industry Segment do you represent?</b>
Name Tom Pruitt	<input checked="" type="checkbox"/> Trans Owners <input type="checkbox"/> <b>Brokers, Aggregators, and Marketers</b>
Organization Duke Energy Grid Operations	<input type="checkbox"/> RTOs, ISOs, RRCs <input type="checkbox"/> Large Electricity End Users
Telephone 704 382-4676	<input type="checkbox"/> LSEs <input type="checkbox"/> Small Electricity Users
E-mail tvpruitt@duke-energy.com	<input type="checkbox"/> TDUs <input type="checkbox"/> <b>Federal, State, and Provincial Regulatory or other Government Entities</b>
	<input type="checkbox"/> Generators

**Questions 1-7 address the proposed Process for certifying Reliability Authority**

**1. Do you agree that there is a reliability-related need to certify the Reliability Authority function?**

Yes  
 No  
 Neutral

Comments:

**2. When there are multiple regions involved, should one region take the lead and make the certification decision or should all involved regions be more actively involved in the interim milestones associated with certification?**

One Region should take the lead and make the certification decision.  
 All Regions should be actively involved in the interim milestones of certification.

Comments We think the certification should be NERC, not a Region or Regions. Else, how will certification from multiple regional councils be handled should those councils have conflicting objectives for the RA and consequently conflicting recommendations for confirmation.

**3. Who should certify the Reliability Authority function?**

- Region
- NERC
- RTO
- Independent Team

Comments: This function is part of the NERC functional model, so certification should be at the same level. The certification process, however, does need to recognize regional differences. Also see comments to question 2 above.

**The recommended Review Team consists of a minimum of three individuals selected from at least three of the categories listed below:**

- **Interchange Authority**
- **Balancing Authority**
- **Reliability Authority**
- **Transmission Operator**
- **Regional Compliance Committee member**
- **Regional Operating Committee member**
- **Representative of NERC Staff**
- **Representative from another NERC Region**
- **Representative from an RTO, when applicable**

**In the alternative, the Region may elect, with the applicant agreement, to engage a completely independent review team.**

**4. Do we have the appropriate review team members identified?**

- Yes
- No

Comments: Need minimum of 4. See comments on question 4 of TOP comment form.

**5. Should a NERC staff person be assigned to each review team?**

- Yes
- No

Comments See comments for question 4.

**SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

---



**6. Have we included anything in the certification process that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

Yes

No

Comments:

**7. Have we missed a step in the certification process that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

Comments: See comment on question 7 on TOP comment form.

**Questions 8-13 address the proposed Criteria included in the SAR.**

**8. Which of the following agreements do you think are necessary? (Check all that you feel should apply)**

An agreement defining responsibilities and authority (during normal and emergency conditions) of the Reliability Authority with respect to

Each adjacent Reliability Authority

Each applicable Balancing Authority

Each applicable Interchange Authority

Each applicable Transmission Operator

Each applicable Transmission Service Provider

Comments: This authority/provider should have agreements in place with all functional entities with which it interfaces.

**9. What other agreements should be required for the Reliability Authority?**

Comments: The RA should also sign the NERC Standard of Conduct. The NERC Standard of Conduct should be explicitly identified in the criteria as one of the agreements for which signing is required.

**10. Who should be required to sign a confidentiality agreement?**

- Reliability Authorities
- Balancing Authorities
- Interchange Authorities
- Transmission Operators
- Transmission Service Providers

Comments: Any entity which receives data that is considered to be confidential should sign a confidentiality agreement.

**11. Have we included anything in the certification criteria that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

- Yes
- No

Comments:

**12. Have we missed anything in the certification criteria that you think is necessary? If yes, please provide details on what you think should be added.**

- Yes
- No

Comments: RE criterion 5.9 -- We (current industry RC functions) currently accept all transactions and allow the IDC to determine curtailments, adjustments, etc. What anticipated rule changes will allow the RA to perform this function?

RE criterion 5.11 -- What does this criterion specifically mean? Is it simply intended as a catch-all for any process/procedure not previously mentioned?

**13. If you are aware of any Regional Differences that need to be addressed in this SAR, please highlight them here.**

**SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

---

Regional Difference:

**14. Other Comments on this Certification SAR:**

Comments: The RA will have limited, if any, knowledge of physical or cyber security incidents unless those incidents impact reliability. The RA should have the responsibility for reporting of incidents which do not impact reliability. We suggest that the phrase "relative to reliability" be added to the end of the sentence under the Security (7.1) criterion.

**Procedures currently exist for re-certification of control areas. Considerations are being given for inclusion of re -certification in the certification standards.**

**15. When should re -certification occur?**

Check all that apply

- Periodic
- Significant change in footprint, corporate organization, or operation
- Repetitive Non-Compliance with Reliability Standards
- Flagrant violation of Reliability Standards

**Comments:** See comments on question 16 on TOP comment form.

## **SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

*The latest version of this SAR (RA\_CERTIFICATION\_01\_01) is posted on the Standards web site at: <http://www.nerc.com/~filez/sar-approved.html>*

*E-mail this form between December 1–January 10, 2003 to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with “SAR Comments” in the subject line.*

***Please review the SAR and answer the questions in the yellow boxes.***

NOTE: The SAR contains the process for certification, followed by the criteria for certification; the questions in this SAR Comment Form are presented in the same order as the SAR.

*If you have questions, please call Maureen Long at 305-891-5497 or send a question to [spm@nerc.com](mailto:spm@nerc.com).*

### **Background**

The Organization Certification Task Force (OCTF) was formed several months ago to draft certification and registration programs to replace the existing Control Area certification and organization registration processes and procedures.

The OCTF held a series of workshops and posted a White Paper to collect preliminary industry comments on the criteria relevant to the new functional entities and there-by develop new processes and procedures for certifying each of these entities. (All the comments collected during these preliminary steps are posted at <http://www.nerc.com/~filez/octf.html>)

This SAR is one of four SARs being posted simultaneously for comment. These SARs, collectively, identify the certification criteria for the Reliability Authority (RA), Balancing Authority (BA), Interchange Authority (IA) and Transmission Operator (TOP). At this time, these are the only functions being considered for certification. Other functions may be considered for certification in the future. (The functions referred to in this document are the functions identified in the NERC Functional Model. <http://www.nerc.com/~oc/fmrtg.html>)

Certification Criteria are those requirements that an entity must meet to be “Certified” by NERC or another certifying entity such as one of the NERC Regions. NERC Certification is an indication that an organization has the resources in place and the ability to perform a reliability function, such as a Balancing Authority, Interchange Authority, etc. Entities that attain their Certification status must comply with applicable NERC Reliability Standards and criteria. Entities that serve multiple reliability functions may need to attain more than one certification. Where an entity wants multiple certifications, we expect to develop a system whereby that entity could apply for all certifications at one time.

**SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

<b>SAR Commenter Information</b>	<b>Which Industry Segment do you represent?</b>
Name Roger D. Green	<input type="checkbox"/> Trans Owners <input type="checkbox"/> <b>Brokers, Aggregators, and Marketers</b>
Organization Southern Company Services - SOCO Generation	<input type="checkbox"/> RTOs, ISOs, RRCs <input type="checkbox"/> Large Electricity End Users
Telephone 205-257-1903	<input type="checkbox"/> LSEs <input type="checkbox"/> Small Electricity Users
E-mail rdgreen@southernco.com	<input type="checkbox"/> TDUs <input type="checkbox"/> <b>Federal, State, and Provincial Regulatory or other Government Entities</b>
	<input checked="" type="checkbox"/> Generators

**Questions 1-7 address the proposed Process for certifying Reliability Authority**

**1. Do you agree that there is a reliability-related need to certify the Reliability Authority function?**

Yes  
 No  
 Neutral

Comments:

**2. When there are multiple regions involved, should one region take the lead and make the certification decision or should all involved regions be more actively involved in the interim milestones associated with certification?**

One Region should take the lead and make the certification decision.  
 All Regions should be actively involved in the interim milestones of certification.

Comments The Region in which the Reliability Authority primarily resides and does business should have the lead role in the certification process and make the formal recommendation for certification or no certification with applicable justifications. All affected Regions should be involved and be allowed to provide input.

**3. Who should certify the Reliability Authority function?**

- Region
- NERC
- RTO
- Independent Team

Comments: Each Region should already have the fundamental structure / organization, collective expertise, reliability knowledge and experience, and representation among its members to handle this appropriately.

**The recommended Review Team consists of a minimum of three individuals selected from at least three of the categories listed below:**

- **Interchange Authority**
- **Balancing Authority**
- **Reliability Authority**
- **Transmission Operator**
- **Regional Compliance Committee member**
- **Regional Operating Committee member**
- **Representative of NERC Staff**
- **Representative from another NERC Region**
- **Representative from an RTO, when applicable**

**In the alternative, the Region may elect, with the applicant agreement, to engage a completely independent review team.**

**4. Do we have the appropriate review team members identified?**

- Yes
- No

Comments: The Review Team should have representation from the Generation Sector. Actions and decisions made by the Reliability Authority could have direct and indirect impacts on the generating plants. Each Region should be encouraged to form a Generation Subcommittee or Working Group that would be involved in the certification process. And the Generator is a fundamental and important component of the NERC Functional Model.

**5. Should a NERC staff person be assigned to each review team?**

## SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR

---

Yes

No

Comments Having a NERC staff person involved to help facilitate the process should help complete the process more quickly and avoid certain pitfalls.

**6. Have we included anything in the certification process that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

Yes

No

Comments: See our response to Question 14.

**7. Have we missed a step in the certification process that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

Comments: None that we can think of at this stage. However, see our response to Question 14.

**Questions 8-13 address the proposed Criteria included in the SAR.**

**8. Which of the following agreements do you think are necessary? (Check all that you feel should apply)**

An agreement defining responsibilities and authority (during normal and emergency conditions) of the Reliability Authority with respect to

Each adjacent Reliability Authority

Each applicable Balancing Authority

Each applicable Interchange Authority

Each applicable Transmission Operator

Each applicable Transmission Service Provider

Comments:

**9. What other agreements should be required for the Reliability Authority?**

Comments: Agreements will be needed that define responsibilities and authority (during normal and emergency conditions) of the Reliability Authority with respect to generating plants, including nuclear plants because they rely on the grid as their preferred power source for safe shutdown equipment.

**10. Who should be required to sign a confidentiality agreement?**

- Reliability Authorities
- Balancing Authorities
- Interchange Authorities
- Transmission Operators
- Transmission Service Providers

Comments: Without knowing the details of the confidentiality agreement and whether it would prevent an entity from performing other economic generator-related functions, it is unclear whether a Balancing Authority should be required to sign.

**11. Have we included anything in the certification criteria that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

- Yes
- No

Comments: See our response to Question 14.

**12. Have we missed anything in the certification criteria that you think is necessary? If yes, please provide details on what you think should be added.**

- Yes
- No

Comments: Section 5 titled Data Acquisition and System Analysis: Need to add "5.12 Process/procedures in place for evaluation of reliability activities on generating plants and notification to generator operators." For example, transmission line outages can directly or indirectly affect generating plants. Nuclear plants may have to be notified of certain line outages

## **SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

---

so they can evaluate the impacts of the outages on the operability of the grid (their "preferred power source" to safe shutdown equipment) and the plant. Appropriate notifications must be made to nuclear plant operators and appropriate operational studies and contingency analyses of the nuclear plant offsite power source must be performed.

Also, see our response to Question 14.

**13. If you are aware of any Regional Differences that need to be addressed in this SAR, please highlight them here.**

Regional Difference:

**14. Other Comments on this Certification SAR:**

Comments: The SAR should establish the minimum acceptable certification processes and criteria that are needed to ensure reliability requirements are met. However, as the standard itself is being developed, the industry may identify changes that would enhance the process and/or criteria. Therefore, provisions should be made in the SAR to permit enhancements to the certification process and criteria during development of the standard itself. One approach would be for the SAR to only outline the key minimum elements that should be included in the certification process, and not try to define specific steps.

**Procedures currently exist for re-certification of control areas. Considerations are being given for inclusion of re -certification in the certification standards.**

**15. When should re -certification occur?**

Check all that apply

- Periodic
- Significant change in footprint, corporate organization, or operation
- Repetitive Non-Compliance with Reliability Standards
- Flagrant violation of Reliability Standards

**Comments:**

## SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR

The latest version of this SAR (RA\_CERTIFICATION\_01\_01) is posted on the Standards web site at: <http://www.nerc.com/~filez/sar-approved.html>

E-mail this form between December 1–January 10, 2003 to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with “SAR Comments” in the subject line.

**Please review the SAR and answer the questions in the yellow boxes.**

NOTE: The SAR contains the process for certification, followed by the criteria for certification; the questions in this SAR Comment Form are presented in the same order as the SAR.

If you have questions, please call Maureen Long at 305-891-5497 or send a question to [spm@nerc.com](mailto:spm@nerc.com).

### Background

The Organization Certification Task Force (OCTF) was formed several months ago to draft certification and registration programs to replace the existing Control Area certification and organization registration processes and procedures.

The OCTF held a series of workshops and posted a White Paper to collect preliminary industry comments on the criteria relevant to the new functional entities and there-by develop new processes and procedures for certifying each of these entities. (All the comments collected during these preliminary steps are posted at <http://www.nerc.com/~filez/octf.html>)

This SAR is one of four SARs being posted simultaneously for comment. These SARs, collectively, identify the certification criteria for the Reliability Authority (RA), Balancing Authority (BA), Interchange Authority (IA) and Transmission Operator (TOP). At this time, these are the only functions being considered for certification. Other functions may be considered for certification in the future. (The functions referred to in this document are the functions identified in the NERC Functional Model. <http://www.nerc.com/~oc/fmrtg.html>)

Certification Criteria are those requirements that an entity must meet to be “Certified” by NERC or another certifying entity such as one of the NERC Regions. NERC Certification is an indication that an organization has the resources in place and the ability to perform a reliability function, such as a Balancing Authority, Interchange Authority, etc. Entities that attain their Certification status must comply with applicable NERC Reliability Standards and criteria. Entities that serve multiple reliability functions may need to attain more than one certification. Where an entity wants multiple certifications, we expect to develop a system whereby that entity could apply for all certifications at one time.

## SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR

SAR Commenter Information		Which Industry Segment do you represent?	
Name	Gerald Rheault	<input checked="" type="checkbox"/> Trans Owners	<input type="checkbox"/> Brokers, Aggregators, and Marketers
Organization	Manitoba Hydro	<input type="checkbox"/> RTOs, ISOs, RRCs	<input type="checkbox"/> Large Electricity End Users
Telephone	204-487-5423	<input checked="" type="checkbox"/> LSEs	<input type="checkbox"/> Small Electricity Users
E-mail	gnrheault@hydro.mb.ca	<input type="checkbox"/> TDUs	<input type="checkbox"/> Federal, State, and Provincial Regulatory or other Government Entities
		<input checked="" type="checkbox"/> Generators	

**Questions 1-7 address the proposed Process for certifying Reliability Authority**

**1. Do you agree that there is a reliability-related need to certify the Reliability Authority function?**

- Yes  
 No  
 Neutral

Comments:

**2. When there are multiple regions involved, should one region take the lead and make the certification decision or should all involved regions be more actively involved in the interim milestones associated with certification?**

- One Region should take the lead and make the certification decision.  
 All Regions should be actively involved in the interim milestones of certification.

Comments Manitoba Hydro believes that the making of the certification decision should be driven by NERC with involvement of the region/regions where the functional Authority will operate. Further comments related to this issue are provided in question 3 and 4 comments.

**3. Who should certify the Reliability Authority function?**

- Region
- NERC
- RTO
- Independent Team

Comments: Manitoba Hydro believes that the region could be involved in the certification process; but the final responsibility for deciding whether an entity qualifies to be certified should rest with NERC. It will be NERC's responsibility to ensure that the Certification Criteria is applied uniformly in all regions.

**The recommended Review Team consists of a minimum of three individuals selected from at least three of the categories listed below:**

- **Interchange Authority**
- **Balancing Authority**
- **Reliability Authority**
- **Transmission Operator**
- **Regional Compliance Committee member**
- **Regional Operating Committee member**
- **Representative of NERC Staff**
- **Representative from another NERC Region**
- **Representative from an RTO, when applicable**

**In the alternative, the Region may elect, with the applicant agreement, to engage a completely independent review team.**

**4. Do we have the appropriate review team members identified?**

- Yes
- No

Comments: Manitoba Hydro believes that this issue does not belong in the Standard as discussed in detail in the question 6 comment.

However, since there will be a requirement to address the issue of Review Team membership in an administrative document relative to this Standard, following is Manitoba Hydro's comments relative to the composition of the Review Team. The review team should be composed of three members. These members should be selected from the following categories:

## SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR

1. NERC staff.
2. Region staff.
3. an independent organization who has expertise in conducting this type of review

The exact composition of representation, from the three classification of entities listed above, is not critical. The Review Team should be composed of individuals who possess expertise in doing these kinds of reviews.

The review team should not include representation from certified authorities or RTO staff because of possible conflict of interest issues.

### 5. Should a NERC staff person be assigned to each review team?

- Yes  
 No

Comments Refer to question 4 and question 6 comments.

### 6. Have we included anything in the certification process that you think is unnecessary? If yes, please provide details on what you think we should eliminate.

- Yes  
 No

Comments: Maitoba Hydro believes that the entire section entitled "Detailed Description of New Standard or Revision to Existing Standard" should be removed from the SAR. The SAR documentation should only start at the section entitled "Reliability Authority Certification Criteria". The Standard which will be produced from this SAR should only deal with "Criteria" and not "Process".

The documentation contained in the section entitled "Detailed Description of New Standard or Revision to Existing Standard" is very relevant in the overall process of certification and should be included in the administrative documentation related to this Standard but does not belong in the Standard itself.

### 7. Have we missed a step in the certification process that you think is necessary? If yes, please provide details on what you think should be added.

- Yes  
 No

Comments: The certification process to be followed should not be included in the Standard and therefore also not in the SAR. That is an administrative document and does not belong in the

Standard. See question 6 comment for further details.

**Questions 8-13 address the proposed Criteria included in the SAR.**

**8. Which of the following agreements do you think are necessary? (Check all that you feel should apply)**

An agreement defining responsibilities and authority (during normal and emergency conditions) of the Reliability Authority with respect to

- Each adjacent Reliability Authority
- Each applicable Balancing Authority
- Each applicable Interchange Authority
- Each applicable Transmission Operator
- Each applicable Transmission Service Provider

Comments: For regions and entities, where the organizational as well as functional unbundling of the functions defined in the Functional Model has occurred, there is a need to develop Agreements which define the responsibilities of each function to one another.

For regions and entities, where physical unbundling without organizational unbundling or no unbundling has occurred, there should be policy documents in place which define the responsibilities and authority of one function relative to another which serves the same purpose as an Agreement between the two functions within the same entity.

The SAR and the subsequent Standard to be developed should be flexible enough to address both of these situations. An agreement should be required when separate organizational entities are involved and appropriate policies should be acceptable when different functions within the same entity are involved.

**9. What other agreements should be required for the Reliability Authority?**

Comments: The ones included in the SAR are adequate.

**10. Who should be required to sign a confidentiality agreement?**

- Reliability Authorities
- Balancing Authorities
- Interchange Authorities
- Transmission Operators

## SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR

---

Transmission Service Providers

Comments: Manitoba Hydro doesn't see any purpose to signing a confidentiality Agreement. Any requirement for confidentiality in dealing with data from other entities should be addressed in the agreement between the Reliability Authority and the other functions.

**11. Have we included anything in the certification criteria that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

Yes

No

Comments: Manitoba Hydro believes that the "code of conduct for personnel" referenced in sections 4.3 and 4.4 is unnecessary. The responsibilities, for each staff member performing functions as part of this functional authority, should be defined in the policy document for the functional authority.

**12. Have we missed anything in the certification criteria that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

Comments:

**13. If you are aware of any Regional Differences that need to be addressed in this SAR, please highlight them here.**

Regional Difference: Manitoba Hydro is not aware of any Regional Differences which need to be addressed.

**14. Other Comments on this Certification SAR:**

Comments: Manitoba Hydro believes that the "Purpose /Industry Need" section of the SAR is poorly written. The purpose should be stated as "To establish an appropriate certification process to ensure that the Reliability Authority is capable of performing its required functions". The Brief Description should focus on the content of the Standard; the criteria related to processes, procedures, tools and agreements required to ensure that the reliability related functions of the Reliability Authority can be carried out.

**Procedures currently exist for re-certification of control areas. Considerations are being given for inclusion of re -certification in the certification standards.**

**15. When should re -certification occur?**

Check all that apply

- Periodic
- Significant change in footprint, corporate organization, or operation
- Repetitive Non-Compliance with Reliability Standards
- Flagrant violation of Reliability Standards

**Comments:** There is no purpose in performing a re-certification on a Functional Authority which is operating satisfactorily. Other Standards which are presently being developed will periodically review whether this Functional Authority is properly performing the tasks required of it. This will be done through a self-certification review or a Reliability Audit which are performed on a yearly and three year basis respectively. If these reviews result in non compliance then a re-certification review may be required.

## **SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

*The latest version of this SAR (RA\_CERTIFICATION\_01\_01) is posted on the Standards web site at: <http://www.nerc.com/~filez/sar-approved.html>*

*E-mail this form between December 1–January 10, 2003 to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with “SAR Comments” in the subject line.*

***Please review the SAR and answer the questions in the yellow boxes.***

NOTE: The SAR contains the process for certification, followed by the criteria for certification; the questions in this SAR Comment Form are presented in the same order as the SAR.

*If you have questions, please call Maureen Long at 305-891-5497 or send a question to [spm@nerc.com](mailto:spm@nerc.com).*

### **Background**

The Organization Certification Task Force (OCTF) was formed several months ago to draft certification and registration programs to replace the existing Control Area certification and organization registration processes and procedures.

The OCTF held a series of workshops and posted a White Paper to collect preliminary industry comments on the criteria relevant to the new functional entities and there-by develop new processes and procedures for certifying each of these entities. (All the comments collected during these preliminary steps are posted at <http://www.nerc.com/~filez/octf.html>)

This SAR is one of four SARs being posted simultaneously for comment. These SARs, collectively, identify the certification criteria for the Reliability Authority (RA), Balancing Authority (BA), Interchange Authority (IA) and Transmission Operator (TOP). At this time, these are the only functions being considered for certification. Other functions may be considered for certification in the future. (The functions referred to in this document are the functions identified in the NERC Functional Model. <http://www.nerc.com/~oc/fmrtg.html>)

Certification Criteria are those requirements that an entity must meet to be “Certified” by NERC or another certifying entity such as one of the NERC Regions. NERC Certification is an indication that an organization has the resources in place and the ability to perform a reliability function, such as a Balancing Authority, Interchange Authority, etc. Entities that attain their Certification status must comply with applicable NERC Reliability Standards and criteria. Entities that serve multiple reliability functions may need to attain more than one certification. Where an entity wants multiple certifications, we expect to develop a system whereby that entity could apply for all certifications at one time.

**SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

<b>SAR Commenter Information</b>	<b>Which Industry Segment do you represent?</b>
Name            Terri M. Kuehneman	<input checked="" type="checkbox"/> Trans Owners <input type="checkbox"/> <b>Brokers, Aggregators, and Marketers</b>
Organization    SRP	<input type="checkbox"/> RTOs, ISOs, RRCs <input type="checkbox"/> Large Electricity End Users
Telephone       602-236-4392	<input checked="" type="checkbox"/> LSEs <input type="checkbox"/> Small Electricity Users
E-mail            tmkuehne@srpnet.com	<input type="checkbox"/> TDUs <input type="checkbox"/> <b>Federal, State, and Provincial Regulatory or other Government Entities</b>
	<input type="checkbox"/> Generators

**Questions 1-7 address the proposed Process for certifying Reliability Authority**

**1. Do you agree that there is a reliability-related need to certify the Reliability Authority function?**

Yes  
 No  
 Neutral

Comments:

**2. When there are multiple regions involved, should one region take the lead and make the certification decision or should all involved regions be more actively involved in the interim milestones associated with certification?**

One Region should take the lead and make the certification decision.  
 All Regions should be actively involved in the interim milestones of certification.

Comments

**3. Who should certify the Reliability Authority function?**

- Region
- NERC
- RTO
- Independent Team

Comments: The certification questionnaire should be a standard one, drafted by the Region.

**The recommended Review Team consists of a minimum of three individuals selected from at least three of the categories listed below:**

- **Interchange Authority**
- **Balancing Authority**
- **Reliability Authority**
- **Transmission Operator**
- **Regional Compliance Committee member**
- **Regional Operating Committee member**
- **Representative of NERC Staff**
- **Representative from another NERC Region**
- **Representative from an RTO, when applicable**

**In the alternative, the Region may elect, with the applicant agreement, to engage a completely independent review team.**

**4. Do we have the appropriate review team members identified?**

- Yes
- No

Comments: Recommend striking the last paragraph in No. 10 of SAR, "In the alternative, the Region may elect, with applicant agreement, to engage a completely independent review team.". Why would an exception be necessary or allowed with such a broad list of choices from which to assemble a qualified review team of three. If paragraph is left in, recommend that a clearer definition of "independent review team" be made at the end of No. 10. Need criteria to assure minimum team member qualifications.

**5. Should a NERC staff person be assigned to each review team?**

- Yes

**SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

---

No  
Comments

**6. Have we included anything in the certification process that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

Yes

No

Comments:

**7. Have we missed a step in the certification process that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

Comments:

**Questions 8-13 address the proposed Criteria included in the SAR.**

**8. Which of the following agreements do you think are necessary? (Check all that you feel should apply)**

An agreement defining responsibilities and authority (during normal and emergency conditions) of the Reliability Authority with respect to

Each adjacent Reliability Authority

Each applicable Balancing Authority

Each applicable Interchange Authority

Each applicable Transmission Operator

Each applicable Transmission Service Provider

Comments:

**9. What other agreements should be required for the Reliability Authority?**

Comments:

**10. Who should be required to sign a confidentiality agreement?**

- Reliability Authorities
- Balancing Authorities
- Interchange Authorities
- Transmission Operators
- Transmission Service Providers

Comments:

**11. Have we included anything in the certification criteria that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

- Yes
- No

Comments:

**12. Have we missed anything in the certification criteria that you think is necessary? If yes, please provide details on what you think should be added.**

- Yes
- No

Comments: Which deficiencies would be serious enough for denial of certification? Which would be categorized as acceptable for conditional "pending certification" status? Or will this be discretionary for the team to decide?

Add a 4.5 to the criteria: Documentation identifying that the Reliability Authority System Operators have written authority to implement manual load shedding when necessary.

**13. If you are aware of any Regional Differences that need to be addressed in this SAR, please highlight them here.**

**SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

---

Regional Difference:

**14. Other Comments on this Certification SAR:**

Comments: The Certification Process should include making changes to the TDF for the WECC Region.

**Procedures currently exist for re-certification of control areas. Considerations are being given for inclusion of re -certification in the certification standards.**

**15. When should re -certification occur?**

Check all that apply

- Periodic
- Significant change in footprint, corporate organization, or operation
- Repetitive Non-Compliance with Reliability Standards
- Flagrant violation of Reliability Standards

**Comments:**

## **SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

*The latest version of this SAR (RA\_CERTIFICATION\_01\_01) is posted on the Standards web site at: <http://www.nerc.com/~filez/sar-approved.html>*

*E-mail this form between December 1–January 10, 2003 to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with “SAR Comments” in the subject line.*

***Please review the SAR and answer the questions in the yellow boxes.***

NOTE: The SAR contains the process for certification, followed by the criteria for certification; the questions in this SAR Comment Form are presented in the same order as the SAR.

*If you have questions, please call Maureen Long at 305-891-5497 or send a question to [spm@nerc.com](mailto:spm@nerc.com).*

### **Background**

The Organization Certification Task Force (OCTF) was formed several months ago to draft certification and registration programs to replace the existing Control Area certification and organization registration processes and procedures.

The OCTF held a series of workshops and posted a White Paper to collect preliminary industry comments on the criteria relevant to the new functional entities and there-by develop new processes and procedures for certifying each of these entities. (All the comments collected during these preliminary steps are posted at <http://www.nerc.com/~filez/octf.html>)

This SAR is one of four SARs being posted simultaneously for comment. These SARs, collectively, identify the certification criteria for the Reliability Authority (RA), Balancing Authority (BA), Interchange Authority (IA) and Transmission Operator (TOP). At this time, these are the only functions being considered for certification. Other functions may be considered for certification in the future. (The functions referred to in this document are the functions identified in the NERC Functional Model. <http://www.nerc.com/~oc/fmrtg.html>)

Certification Criteria are those requirements that an entity must meet to be “Certified” by NERC or another certifying entity such as one of the NERC Regions. NERC Certification is an indication that an organization has the resources in place and the ability to perform a reliability function, such as a Balancing Authority, Interchange Authority, etc. Entities that attain their Certification status must comply with applicable NERC Reliability Standards and criteria. Entities that serve multiple reliability functions may need to attain more than one certification. Where an entity wants multiple certifications, we expect to develop a system whereby that entity could apply for all certifications at one time.

**SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

<b>SAR Commenter Information</b>	<b>Which Industry Segment do you represent?</b>
Name           Stuart Goza	<input checked="" type="checkbox"/> Trans Owners <input type="checkbox"/> <b>Brokers, Aggregators, and Marketers</b>
Organization   Tennessee Valley Authority	<input type="checkbox"/> RTOs, ISOs, RRCs <input type="checkbox"/> Large Electricity End Users
Telephone       (423) 697-4197	<input type="checkbox"/> LSEs <input type="checkbox"/> Small Electricity Users
E-mail           slgoza@tva.gov	<input type="checkbox"/> TDU's <input type="checkbox"/> <b>Federal, State, and Provincial Regulatory or other Government Entities</b>
	<input type="checkbox"/> Generators

**Questions 1-7 address the proposed Process for certifying Reliability Authority**

**1. Do you agree that there is a reliability-related need to certify the Reliability Authority function?**

Yes  
 No  
 Neutral

Comments:

**2. When there are multiple regions involved, should one region take the lead and make the certification decision or should all involved regions be more actively involved in the interim milestones associated with certification?**

One Region should take the lead and make the certification decision.  
 All Regions should be actively involved in the interim milestones of certification.

Comments

**3. Who should certify the Reliability Authority function?**

- Region
- NERC
- RTO
- Independent Team

Comments:

**The recommended Review Team consists of a minimum of three individuals selected from at least three of the categories listed below:**

- **Interchange Authority**
- **Balancing Authority**
- **Reliability Authority**
- **Transmission Operator**
- **Regional Compliance Committee member**
- **Regional Operating Committee member**
- **Representative of NERC Staff**
- **Representative from another NERC Region**
- **Representative from an RTO, when applicable**

**In the alternative, the Region may elect, with the applicant agreement, to engage a completely independent review team.**

**4. Do we have the appropriate review team members identified?**

- Yes
- No

Comments:

**5. Should a NERC staff person be assigned to each review team?**

- Yes
- No

Comments

**6. Have we included anything in the certification process that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

Yes

No

Comments:

**7. Have we missed a step in the certification process that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

Comments:

**Questions 8-13 address the proposed Criteria included in the SAR.**

**8. Which of the following agreements do you think are necessary? (Check all that you feel should apply)**

An agreement defining responsibilities and authority (during normal and emergency conditions) of the Reliability Authority with respect to

Each adjacent Reliability Authority

Each applicable Balancing Authority

Each applicable Interchange Authority

Each applicable Transmission Operator

Each applicable Transmission Service Provider

Comments:

**9. What other agreements should be required for the Reliability Authority?**

Comments:

**10. Who should be required to sign a confidentiality agreement?**

- Reliability Authorities
- Balancing Authorities
- Interchange Authorities
- Transmission Operators
- Transmission Service Providers

Comments:

**11. Have we included anything in the certification criteria that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

- Yes
- No

Comments:

**12. Have we missed anything in the certification criteria that you think is necessary? If yes, please provide details on what you think should be added.**

- Yes
- No

Comments:

**13. If you are aware of any Regional Differences that need to be addressed in this SAR, please highlight them here.**

Regional Difference:

**14. Other Comments on this Certification SAR:**

Comments:

**Procedures currently exist for re-certification of control areas. Considerations are being given for inclusion of re -certification in the certification standards.**

**15. When should re -certification occur?**

Check all that apply

- Periodic
- Significant change in footprint, corporate organization, or operation
- Repetitive Non-Compliance with Reliability Standards
- Flagrant violation of Reliability Standards

**Comments:**



1515 BROADWAY, NEW YORK, NY 10036-8901 TELEPHONE: (212) 840-1070 FAX: (212) 302-2782

January 10, 2003

**Subject: Additional NPCC Comments to All Posted Certification SARs,  
(TO, IA, RA, and BA)**

NPCC would like to submit the following overall comments regarding the Certification SARs.

**“NPCC feels the certification processes as outlined in the four posted SARs are not Reliability Standards and as such should not be subject to the same development and approval processes as Reliability Standards outlined in the Process Manual. NERC needs to develop an alternate process for dealing with non-reliability standard/policy issues such as these.”**

**“At this time, the NERC Functional Model has not been finalized and NPCC recommends delaying the development of the Certification Process until such time as the Model is finalized and all proper approvals have been granted.”**

Please do not hesitate to e-mail me at [gzito@npcc.org](mailto:gzito@npcc.org) or call me at (212) 840-1070, if you have any further questions or comments.

Very truly yours,

Guy V. Zito  
Manager, Planning  
Northeast Power Coordinating Council

Cc: Edward Schwerdt NPCC

Stanley Kopman NPCC

## **SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

*The latest version of this SAR (RA\_CERTIFICATION\_01\_01) is posted on the Standards web site at: <http://www.nerc.com/~filez/sar-approved.html>*

*E-mail this form between December 1–January 10, 2003 to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with “SAR Comments” in the subject line.*

***Please review the SAR and answer the questions in the yellow boxes.***

NOTE: The SAR contains the process for certification, followed by the criteria for certification; the questions in this SAR Comment Form are presented in the same order as the SAR.

*If you have questions, please call Maureen Long at 305-891-5497 or send a question to [spm@nerc.com](mailto:spm@nerc.com).*

### **Background**

The Organization Certification Task Force (OCTF) was formed several months ago to draft certification and registration programs to replace the existing Control Area certification and organization registration processes and procedures.

The OCTF held a series of workshops and posted a White Paper to collect preliminary industry comments on the criteria relevant to the new functional entities and there-by develop new processes and procedures for certifying each of these entities. (All the comments collected during these preliminary steps are posted at <http://www.nerc.com/~filez/octf.html>)

This SAR is one of four SARs being posted simultaneously for comment. These SARs, collectively, identify the certification criteria for the Reliability Authority (RA), Balancing Authority (BA), Interchange Authority (IA) and Transmission Operator (TOP). At this time, these are the only functions being considered for certification. Other functions may be considered for certification in the future. (The functions referred to in this document are the functions identified in the NERC Functional Model. <http://www.nerc.com/~oc/fmrtg.html>)

Certification Criteria are those requirements that an entity must meet to be “Certified” by NERC or another certifying entity such as one of the NERC Regions. NERC Certification is an indication that an organization has the resources in place and the ability to perform a reliability function, such as a Balancing Authority, Interchange Authority, etc. Entities that attain their Certification status must comply with applicable NERC Reliability Standards and criteria. Entities that serve multiple reliability functions may need to attain more than one certification. Where an entity wants multiple certifications, we expect to develop a system whereby that entity could apply for all certifications at one time.

**SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

<b>SAR Commenter Information</b>	<b>Which Industry Segment do you represent?</b>
Name            Ed Riley	<input type="checkbox"/> Trans Owners <input type="checkbox"/> <b>Brokers, Aggregators, and Marketers</b>
Organization    CISO	<input checked="" type="checkbox"/> RTOs, ISOs, RRCs <input type="checkbox"/> Large Electricity End Users
Telephone        916.351.4463	<input type="checkbox"/> LSEs <input type="checkbox"/> Small Electricity Users
E-mail            eriley@caiso.com	<input type="checkbox"/> TDUs <input type="checkbox"/> <b>Federal, State, and Provincial Regulatory or other Government Entities</b>
	<input type="checkbox"/> Generators

**Questions 1-7 address the proposed Process for certifying Reliability Authority**

**1. Do you agree that there is a reliability-related need to certify the Reliability Authority function?**

Yes  
 No  
 Neutral

Comments:

**2. When there are multiple regions involved, should one region take the lead and make the certification decision or should all involved regions be more actively involved in the interim milestones associated with certification?**

One Region should take the lead and make the certification decision.  
 All Regions should be actively involved in the interim milestones of certification.

Comments NERC should be the certifying body when regional boundaries are exceeded by any "authority".

**3. Who should certify the Reliability Authority function?**

- Region
- NERC
- RTO
- Independent Team

Comments: See 2. above.

**The recommended Review Team consists of a minimum of three individuals selected from at least three of the categories listed below:**

- **Interchange Authority**
- **Balancing Authority**
- **Reliability Authority**
- **Transmission Operator**
- **Regional Compliance Committee member**
- **Regional Operating Committee member**
- **Representative of NERC Staff**
- **Representative from another NERC Region**
- **Representative from an RTO, when applicable**

**In the alternative, the Region may elect, with the applicant agreement, to engage a completely independent review team.**

**4. Do we have the appropriate review team members identified?**

- Yes
- No

Comments: The reviewing parties must have some expertise in the functions, roles, and responsibilities of the "authority" to be reviewed; it doesn't really matter what category they come from. There should always be a fourth individual from the NERC staff on each review team to ensure consistency and objectivity. The CISO believes it is inappropriate for a region to engage an independent review team - NERC should be the certifying body if the region doesn't want to do it.

**5. Should a NERC staff person be assigned to each review team?**

- Yes
- No

**SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

---

Comments See 4. above.

**6. Have we included anything in the certification process that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

Yes

No

Comments:

**7. Have we missed a step in the certification process that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

Comments:

**Questions 8-13 address the proposed Criteria included in the SAR.**

**8. Which of the following agreements do you think are necessary? (Check all that you feel should apply)**

An agreement defining responsibilities and authority (during normal and emergency conditions) of the Reliability Authority with respect to

Each adjacent Reliability Authority

Each applicable Balancing Authority

Each applicable Interchange Authority

Each applicable Transmission Operator

Each applicable Transmission Service Provider

Comments: The use of the term "agreement" is not defined sufficiently. The term could refer to a contract, a tariff, or processes and procedures, possibly even undocumented, between two or more entities. It appears that, at the minimum, procedures for both normal and emergency operations should be in place and that these procedures could be reviewed as part of the certification process.

**9. What other agreements should be required for the Reliability Authority?**

Comments: All agreements deemed necessary to ensure system reliability, including agreements with operating data providers (TOW).

**10. Who should be required to sign a confidentiality agreement?**

- Reliability Authorities
- Balancing Authorities
- Interchange Authorities
- Transmission Operators
- Transmission Service Providers

Comments: We are confused by this question - what type of confidentiality agreement are you considering? The NERC data confidentiality agreement or some other agreement?

**11. Have we included anything in the certification criteria that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

- Yes
- No

Comments:

**12. Have we missed anything in the certification criteria that you think is necessary? If yes, please provide details on what you think should be added.**

- Yes
- No

Comments:

**13. If you are aware of any Regional Differences that need to be addressed in this SAR,**

**SAR Comment Form for 1st Posting of the Reliability Authority Certification SAR**

---

**please highlight them here.**

Regional Difference: WECC Reliability Coordinator Empowerment agreements may, or may not, come into play here - this is a placeholder for further development if necessary.

**14. Other Comments on this Certification SAR:**

Comments:

**Procedures currently exist for re-certification of control areas. Considerations are being given for inclusion of re -certification in the certification standards.**

**15. When should re -certification occur?**

Check all that apply

- Periodic
- Significant change in footprint, corporate organization, or operation
- Repetitive Non-Compliance with Reliability Standards
- Flagrant violation of Reliability Standards

**Comments:** All of the above are appropriate triggers for review/recertification.