

**Comment Form – Transmission Operator Certification Standards, Draft 3**

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This form is to be used to submit comments on the proposed Draft 3 of the Transmission Operator Certification Standards. Comments must be submitted by **October 15, 2005**. You may submit the completed form by emailing it to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the words “Transmission Operator Certification Standards Comments” in the subject line. If you have questions please contact Mark Ladrow at [mark.ladrow@nerc.net](mailto:mark.ladrow@nerc.net) or by telephone at 609-452-8060.

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  - Do submit any formatted text or markups in a separate WORD file.

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  - Do not use numbering or bullets in any data field.
  - Do not use quotation marks in any data field.
  - Do not submit a response in an unprotected copy of this form.

<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	Kenneth Skroback
Organization:	Alabama Electric Cooperative, Inc
Telephone:	334-427-3257
Email:	ken.skroback@powersouth.com
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/> 3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input checked="" type="checkbox"/> 4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/> 5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/> 6 - Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input type="checkbox"/> 7 - Large Electricity End Users
<input checked="" type="checkbox"/> SERC	<input type="checkbox"/> 8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/> 9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	
<input type="checkbox"/> NA - Not Applicable	

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Group Comments (Complete this page if comments are from a group.)

**Group Name:**  
**Lead Contact:**  
**Contact Organization:**  
**Contact Segment:**  
**Contact Telephone:**  
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<b>Additional Member Name</b>	<b>Additional Member Organization</b>	<b>Region*</b>	<b>Segment*</b>

\*If more than one Region or Segment applies, indicate the best fit for the purpose of these comments.  
Regional acronyms and segment numbers are shown on prior page.

**Background Information:**

To understand the Standard Drafting Team’s philosophy used to create the standard, refer to the Transmission Operator Certification SAR, the Functional Model, and its Technical Discussion Document. These documents were used in the drafting of the standard and can be accessed at the following links:

[ftp://www.nerc.com/pub/sys/all\\_updl/standards/sar/TOP\\_CERTIFICATION\\_01\\_03.pdf](ftp://www.nerc.com/pub/sys/all_updl/standards/sar/TOP_CERTIFICATION_01_03.pdf)  
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Changes were made in the drafting of the standard to reflect the revisions made to the Functional Model since the drafting of the SAR.

The Certification Standard Drafting Team would like to receive industry comments on this group of standards. Accordingly, we request your comments included on this form, emailed to [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the subject “Transmission Operator Certification Standards Comments” by **October 15, 2005**.

**Standard – ORG-001-1 – Transmission Operator Certification – Certification**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard. In addition, the Drafting Team removed the requirement of a site-visit because it was redundant with the elements of the administrative process. The removal of this requirement does not eliminate the need for a site visit from the process, but merely places the elements in the certification administrative process.

1. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Certification standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-002-1 – Transmission Operator Certification – Agreements**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting Team has made modification to provide clarification to the standard. In addition, the Drafting Team has removed the requirement for the TOP to sign the NERC Confidentiality Agreement. It was identified during the comment period that some TOPs can perform their responsibilities without having access to this ISN data. If this can be accomplished, there is no justification for this requirement. The removal of this requirement from the standard does not eliminate the need to sign the confidentiality agreement if the entity requires access to the ISN data.

2. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Agreements standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-003-1 – Transmission Operator Certification – Personnel**

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3. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Personnel standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-004-1 – Transmission Operator Certification – Data Acquisition and Monitoring**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

4. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Data Acquisition and Monitoring standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-007-1 – Transmission Operator Certification – Loss of Control Center Functionality**

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5. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Loss of Control Center Functionality standard? If not, please explain in the comment area.

Yes

No

Comments:

6. During the 2<sup>nd</sup> posting of the TOP Certification Standards, industry consensus was obtained for the Introduction, Requirements, Measures, and Compliance elements of:

**ORG-005 - Transmission Operator Certification — System Analysis**

**ORG-006 - Transmission Operator Certification — Emergency Operations**

**ORG-008 - Transmission Operator Certification — Restoration.**

The Drafting Team is not asking any specific questions related to these standards, but is providing an opportunity for comments related to them.

Comments:

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Comments:

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8. Please identify any regional differences that should be included in the standards? (Please identify the standard, the requirement, and specific difference that needs to be included in the requirement)

Comments:

9. Do you agree with the proposed implementation plan? If not, please explain in the comment area.

Yes

No

Comments:

10. The Drafting Team believes that the TOP Certification standards are ready for ballot. Do you support this position? If not, please explain in the comment area.

Yes

No

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<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	Tim Hattaway
Organization:	Alabama Electric Cooperative
Telephone:	334-427-3282
Email:	tim.hattaway@powersouth.com
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
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<input checked="" type="checkbox"/> SERC	<input type="checkbox"/> 8 - Small Electricity End Users
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**Standard – ORG-001-1 – Transmission Operator Certification – Certification**

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Yes

No

Comments:

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Yes

No

Comments:

**Standard – ORG-003-1 – Transmission Operator Certification – Personnel**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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Yes

No

Comments:

**Standard – ORG-004-1 – Transmission Operator Certification – Data Acquisition and Monitoring**

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Yes

No

Comments:

**Standard – ORG-007-1 – Transmission Operator Certification – Loss of Control Center Functionality**

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Yes

No

Comments:

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Comments:

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Comments:

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8. Please identify any regional differences that should be included in the standards? (Please identify the standard, the requirement, and specific difference that needs to be included in the requirement)

Comments:

9. Do you agree with the proposed implementation plan? If not, please explain in the comment area.

Yes

No

Comments:

10. The Drafting Team believes that the TOP Certification standards are ready for ballot. Do you support this position? If not, please explain in the comment area.

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Ben Porath	
Organization:	Dairyland Power Cooperative	
Telephone:	(608) 787-1429	
Email:	blp@dairynet.com	
NERC Region	Registered Ballot Body Segment	
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/> 1 - Transmission Owners	
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Yes

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2. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Agreements standard? If not, please explain in the comment area.

Yes

No

Comments: Dairyland supports the removal of the requirement that a TOP must execute the NERC ORD Confidentiality Agreement in order to be certified as a TOP. Dairyland agrees that this need only be signed if the TOP requires access to ISN data.

**Standard – ORG-003-1 – Transmission Operator Certification – Personnel**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

3. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Personnel standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-004-1 – Transmission Operator Certification – Data Acquisition and Monitoring**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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Yes

No

Comments:

**Standard – ORG-007-1 – Transmission Operator Certification – Loss of Control Center Functionality**

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Yes

No

Comments:

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Comments:

9. Do you agree with the proposed implementation plan? If not, please explain in the comment area.

Yes

No

Comments:

10. The Drafting Team believes that the TOP Certification standards are ready for ballot. Do you support this position? If not, please explain in the comment area.

Yes

No

Comments:

Comments by **Western Farmers Electric Cooperative** Regarding Draft #2 of the Transmission Operator Function Certification Requirements

**October 6, 2005**

Western Farmers Electric Cooperative is submitting the following comments to support the removal of the requirement that an entity applying to be certified as a Transmission Operator (TOP) under the NERC Functional Model must execute the "Operating Reliability Data (ORD) Confidentiality Agreement" referenced in Draft #2 of the TOP certification requirements.

The requirement of a TOP to sign this agreement and the related functional unbundling requirement is problematic for some G&T Cooperatives and municipal joint action agencies that are currently control area operators (and others performing limited control functions) but do not require access to such data and are not required to functionally unbundle. Many entities have been successfully performing the Control Area Operator function (which for many includes the responsibilities of the TOP function) without being functionally unbundled and without receiving the reliability operating data the confidentiality agreement refers to.

Many systems are currently operating their transmission system without having signed the current Confidentiality Agreement, and there is no legitimate reason why these entities should not be allowed to continue operating their transmission systems under the Functional Model. The only legitimate and necessary reason for an entity to sign the agreement is if they are receiving security data from the Interregional Security Network (ISN). Many systems currently provide all of the required security data to their reliability coordinator, but do not receive any ISN data in return. This should negate any need to sign the agreement.

This draft requirement, if left in place, would prevent both G&T Cooperatives and municipal systems that have not signed the ORD agreement and are not functionally separated, from continuing to reliably operate their own transmission systems.

It has also come to our attention that the NERC Operating Committee on June 8 unanimously passed a motion that stated in very clear terms the following:

"The certification standard should not require that the Transmission Operator sign the data confidentiality agreement."

The OC and its members from all segments of the electric utility industry have submitted this motion as comments in the TOP certification standard process. We fully endorse these OC comments and reiterate that all segments of the industry on the OC support removing the ORD agreement as a requirement to be certified as a TOP.

Finally, to date the draft ORD Confidentiality Agreement has not been included as a part of the draft certification requirement – it has only been referenced by the standard drafting team. We strongly believe that all documents and requirements necessary for certification as any Function under the NERC Functional Model should be a part of the standard drafting materials that are sent out for industry comments.

Western Farmers Electric Cooperative agrees that Transmission Operator entities should not have to sign the ORD Confidentiality Agreement in order to be certified as a Transmission Operator under the Functional Model if they do not require access to such data in order to reliably perform the TOP function. The ability to perform this function without such data and without being functionally unbundled can be confirmed by recent and past performance that NERC audits and assessments can confirm.

**October 6, 2005**  
**Alan Derichsweiler**  
**Western Farmers Electric Cooperative**

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Name:	Barry Lawson
Organization:	National Rural Electric Cooperative Association (NRECA)
Telephone:	703-907-5781
Email:	barry.lawson@nreca.coop
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
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**Standard – ORG-001-1 – Transmission Operator Certification – Certification**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard. In addition, the Drafting Team removed the requirement of a site-visit because it was redundant with the elements of the administrative process. The removal of this requirement does not eliminate the need for a site visit from the process, but merely places the elements in the certification administrative process.

1. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Certification standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-002-1 – Transmission Operator Certification – Agreements**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting Team has made modification to provide clarification to the standard. In addition, the Drafting Team has removed the requirement for the TOP to sign the NERC Confidentiality Agreement. It was identified during the comment period that some TOPs can perform their responsibilities without having access to this ISN data. If this can be accomplished, there is no justification for this requirement. The removal of this requirement from the standard does not eliminate the need to sign the confidentiality agreement if the entity requires access to the ISN data.

2. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Agreements standard? If not, please explain in the comment area.

Yes

No

Comments: NRECA supports the removal of the requirement that a TOP must execute the NERC ORD Confidentiality Agreement in order to be certified as a TOP. NRECA agrees that this only needs to be signed if an entity requires access to the ISN data from NERC as referred to in the ORD agreement.

**Standard – ORG-003-1 – Transmission Operator Certification – Personnel**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

3. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Personnel standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-004-1 – Transmission Operator Certification – Data Acquisition and Monitoring**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

4. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Data Acquisition and Monitoring standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-007-1 – Transmission Operator Certification – Loss of Control Center Functionality**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

5. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Loss of Control Center Functionality standard? If not, please explain in the comment area.

Yes

No

Comments:

6. During the 2<sup>nd</sup> posting of the TOP Certification Standards, industry consensus was obtained for the Introduction, Requirements, Measures, and Compliance elements of:

**ORG-005 - Transmission Operator Certification — System Analysis**

**ORG-006 - Transmission Operator Certification — Emergency Operations**

**ORG-008 - Transmission Operator Certification — Restoration.**

The Drafting Team is not asking any specific questions related to these standards, but is providing an opportunity for comments related to them.

Comments:

7. Please identify any elements that should be included in the standards that have not been identified?

Comments:

8. Please identify any regional differences that should be included in the standards? (Please identify the standard, the requirement, and specific difference that needs to be included in the requirement)

Comments:

9. Do you agree with the proposed implementation plan? If not, please explain in the comment area.

Yes

No

Comments:

10. The Drafting Team believes that the TOP Certification standards are ready for ballot. Do you support this position? If not, please explain in the comment area.

Yes

No

Comments:

**Comment Form – Transmission Operator Certification Standards, Draft 3**

---

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  - Do not submit a response in an unprotected copy of this form.

<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Alan Wilkinson	
Organization:	Southwest Transmission Cooperative, Inc.	
Telephone:	520-586-5315	
Email:	awilkinson@swtransco.coop	
NERC Region	Registered Ballot Body Segment	
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/> 1 - Transmission Owners	
<input type="checkbox"/> ECAR	<input type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils	
<input type="checkbox"/> FRCC	<input type="checkbox"/> 3 - Load-serving Entities	
<input type="checkbox"/> MAAC	<input type="checkbox"/> 4 - Transmission-dependent Utilities	
<input type="checkbox"/> MAIN	<input type="checkbox"/> 5 - Electric Generators	
<input type="checkbox"/> MAPP	<input type="checkbox"/> 6 - Electricity Brokers, Aggregators, and Marketers	
<input type="checkbox"/> NPCC	<input type="checkbox"/> 7 - Large Electricity End Users	
<input type="checkbox"/> SERC	<input type="checkbox"/> 8 - Small Electricity End Users	
<input checked="" type="checkbox"/> WECC	<input type="checkbox"/> 9 - Federal, State, Provincial Regulatory or other Government Entities	
<input type="checkbox"/> NA - Not Applicable		

**Comment Form – Transmission Operator Certification Standards, Draft 3**

---

Group Comments (Complete this page if comments are from a group.)

**Group Name:**

**Lead Contact:**

**Contact Organization:**

**Contact Segment:**

**Contact Telephone:**

**Contact Email:**

Additional Member Name	Additional Member Organization	Region*	Segment*

\*If more than one Region or Segment applies, indicate the best fit for the purpose of these comments.  
Regional acronyms and segment numbers are shown on prior page.

**Background Information:**

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Changes were made in the drafting of the standard to reflect the revisions made to the Functional Model since the drafting of the SAR.

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**Standard – ORG-001-1 – Transmission Operator Certification – Certification**

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1. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Certification standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-002-1 – Transmission Operator Certification – Agreements**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting Team has made modification to provide clarification to the standard. In addition, the Drafting Team has removed the requirement for the TOP to sign the NERC Confidentiality Agreement. It was identified during the comment period that some TOPs can perform their responsibilities without having access to this ISN data. If this can be accomplished, there is no justification for this requirement. The removal of this requirement from the standard does not eliminate the need to sign the confidentiality agreement if the entity requires access to the ISN data.

2. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Agreements standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-003-1 – Transmission Operator Certification – Personnel**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

3. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Personnel standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-004-1 – Transmission Operator Certification – Data Acquisition and Monitoring**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

4. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Data Acquisition and Monitoring standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-007-1 – Transmission Operator Certification – Loss of Control Center Functionality**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

5. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Loss of Control Center Functionality standard? If not, please explain in the comment area.

Yes

No

Comments:

6. During the 2<sup>nd</sup> posting of the TOP Certification Standards, industry consensus was obtained for the Introduction, Requirements, Measures, and Compliance elements of:

**ORG-005 - Transmission Operator Certification — System Analysis**

**ORG-006 - Transmission Operator Certification — Emergency Operations**

**ORG-008 - Transmission Operator Certification — Restoration.**

The Drafting Team is not asking any specific questions related to these standards, but is providing an opportunity for comments related to them.

Comments:

7. Please identify any elements that should be included in the standards that have not been identified?

Comments:

**Comment Form – Transmission Operator Certification Standards, Draft 3**

---

8. Please identify any regional differences that should be included in the standards? (Please identify the standard, the requirement, and specific difference that needs to be included in the requirement)

Comments:

9. Do you agree with the proposed implementation plan? If not, please explain in the comment area.

Yes

No

Comments:

10. The Drafting Team believes that the TOP Certification standards are ready for ballot. Do you support this position? If not, please explain in the comment area.

Yes

No

Comments:

**Comment Form – Transmission Operator Certification Standards, Draft 3**

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<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	Dan M. Kay
Organization:	South Mississippi Electric Powe Assocaition
Telephone:	601-261-2369
Email:	dkay@smepa.com
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/> 3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input checked="" type="checkbox"/> 4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/> 5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/> 6 - Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input type="checkbox"/> 7 - Large Electricity End Users
<input checked="" type="checkbox"/> SERC	<input type="checkbox"/> 8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/> 9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	
<input type="checkbox"/> NA - Not Applicable	

**Comment Form – Transmission Operator Certification Standards, Draft 3**

---

Group Comments (Complete this page if comments are from a group.)

**Group Name:**  
**Lead Contact:**  
**Contact Organization:**  
**Contact Segment:**  
**Contact Telephone:**  
**Contact Email:**

Additional Member Name	Additional Member Organization	Region*	Segment*

\*If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

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Changes were made in the drafting of the standard to reflect the revisions made to the Functional Model since the drafting of the SAR.

The Certification Standard Drafting Team would like to receive industry comments on this group of standards. Accordingly, we request your comments included on this form, emailed to [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the subject “Transmission Operator Certification Standards Comments” by **October 15, 2005**.

**Standard – ORG-001-1 – Transmission Operator Certification – Certification**

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1. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Certification standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-002-1 – Transmission Operator Certification – Agreements**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting Team has made modification to provide clarification to the standard. In addition, the Drafting Team has removed the requirement for the TOP to sign the NERC Confidentiality Agreement. It was identified during the comment period that some TOPs can perform their responsibilities without having access to this ISN data. If this can be accomplished, there is no justification for this requirement. The removal of this requirement from the standard does not eliminate the need to sign the confidentiality agreement if the entity requires access to the ISN data.

2. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Agreements standard? If not, please explain in the comment area.

Yes

No

Comments: SMEPA supports the removal of the requirement that a TOP must execute the NERC ORD Confidentiality Agreement in order to be certified as a TOP.

**Standard – ORG-003-1 – Transmission Operator Certification – Personnel**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

3. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Personnel standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-004-1 – Transmission Operator Certification – Data Acquisition and Monitoring**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

4. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Data Acquisition and Monitoring standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-007-1 – Transmission Operator Certification – Loss of Control Center Functionality**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

5. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Loss of Control Center Functionality standard? If not, please explain in the comment area.

Yes

No

Comments:

6. During the 2<sup>nd</sup> posting of the TOP Certification Standards, industry consensus was obtained for the Introduction, Requirements, Measures, and Compliance elements of:

**ORG-005 - Transmission Operator Certification — System Analysis**

**ORG-006 - Transmission Operator Certification — Emergency Operations**

**ORG-008 - Transmission Operator Certification — Restoration.**

The Drafting Team is not asking any specific questions related to these standards, but is providing an opportunity for comments related to them.

Comments:

7. Please identify any elements that should be included in the standards that have not been identified?

Comments:

**Comment Form – Transmission Operator Certification Standards, Draft 3**

---

8. Please identify any regional differences that should be included in the standards? (Please identify the standard, the requirement, and specific difference that needs to be included in the requirement)

Comments:

9. Do you agree with the proposed implementation plan? If not, please explain in the comment area.

Yes

No

Comments:

10. The Drafting Team believes that the TOP Certification standards are ready for ballot. Do you support this position? If not, please explain in the comment area.

Yes

No

Comments:

**Comment Form – Transmission Operator Certification Standards, Draft 3**

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Gordon Pietsch	
Organization:	Great River Energy	
Telephone:	763-241-2235	
Email:	gpietsch@GREnergy.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/>	5 - Electric Generators
<input checked="" type="checkbox"/> MAPP	<input type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC		
<input type="checkbox"/> NA - Not Applicable		



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To understand the Standard Drafting Team's philosophy used to create the standard, refer to the Transmission Operator Certification SAR, the Functional Model, and its Technical Discussion Document. These documents were used in the drafting of the standard and can be accessed at the following links:

[ftp://www.nerc.com/pub/sys/all\\_updl/standards/sar/TOP\\_CERTIFICATION\\_01\\_03.pdf](ftp://www.nerc.com/pub/sys/all_updl/standards/sar/TOP_CERTIFICATION_01_03.pdf)  
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The Certification Standard Drafting Team would like to receive industry comments on this group of standards. Accordingly, we request your comments included on this form, emailed to [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the subject "Transmission Operator Certification Standards Comments" by **October 15, 2005**.

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Yes

No

Comments:

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Yes

No

Comments:

**Standard – ORG-003-1 – Transmission Operator Certification – Personnel**

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3. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Personnel standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-004-1 – Transmission Operator Certification – Data Acquisition and Monitoring**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

4. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Data Acquisition and Monitoring standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-007-1 – Transmission Operator Certification – Loss of Control Center Functionality**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

5. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Loss of Control Center Functionality standard? If not, please explain in the comment area.

Yes

No

Comments:

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Comments:

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Comments:

**Comment Form – Transmission Operator Certification Standards, Draft 3**

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Comments:

9. Do you agree with the proposed implementation plan? If not, please explain in the comment area.

Yes

No

Comments:

10. The Drafting Team believes that the TOP Certification standards are ready for ballot. Do you support this position? If not, please explain in the comment area.

Yes

No

Comments:

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Ray Morella	
Organization:	FirstEnergy Corp	
Telephone:	330.384.5686	
Email:	morellar@firstenergycorp.com	
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 - Transmission Owners
<input checked="" type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities
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<http://www.nerc.com/~filez/functionalmode.html>

Changes were made in the drafting of the standard to reflect the revisions made to the Functional Model since the drafting of the SAR.

The Certification Standard Drafting Team would like to receive industry comments on this group of standards. Accordingly, we request your comments included on this form, emailed to [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the subject "Transmission Operator Certification Standards Comments" by **October 15, 2005**.

**Standard – ORG-001-1 – Transmission Operator Certification – Certification**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard. In addition, the Drafting Team removed the requirement of a site-visit because it was redundant with the elements of the administrative process. The removal of this requirement does not eliminate the need for a site visit from the process, but merely places the elements in the certification administrative process.

1. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Certification standard? If not, please explain in the comment area.

Yes

No

Comments: R5 should be reworded as follows:

The awarding of certification to the Transmission Operator by the NERC Regional Reliability Organizations shall be based on satisfying all of the requirements defined in the NERC Transmission Operator Certification Standards identified in Requirement R1.

**Standard – ORG-002-1 – Transmission Operator Certification – Agreements**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting Team has made modification to provide clarification to the standard. In addition, the Drafting Team has removed the requirement for the TOP to sign the NERC Confidentiality Agreement. It was identified during the comment period that some TOPs can perform their responsibilities without having access to this ISN data. If this can be accomplished, there is no justification for this requirement. The removal of this requirement from the standard does not eliminate the need to sign the confidentiality agreement if the entity requires access to the ISN data.

2. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Agreements standard? If not, please explain in the comment area.

Yes

No

Comments:

R1.1.10. Should be changed from "as requested" to "as directed" by the Balancing Authority or Reliability Coordinator.

**Standard – ORG-003-1 – Transmission Operator Certification – Personnel**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

## Comment Form – Transmission Operator Certification Standards, Draft 3

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3. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Personnel standard? If not, please explain in the comment area.

Yes

No

Comments: R1.1 of the standard states the tasks of a Transmission Operator as

"Monitor, operate or direct the operations of the transmission system within equipment and facility ratings." Monitor, operate or direct the operations wording causes industry confusion. Are these the personnel that perform SCADA switching and direct the field personnel to perform the actual switching operation on a real-time basis or are these the personnel at the Reliability Coordination position that authorize outages? This needs to be resolved prior to implementing these standards and this standard should clearly specify who is the transmission operator.

"Deploy reactive resources to maintain acceptable voltage profiles." Webster defines the word deploy as "to spread out (as troops or ships) in order for battle" This should read Utilize reactive resources to maintain acceptable voltage profiles through "direction of field personnel or SCADA Switching" for personnel that perform SCADA switching or direct the actual switching of field personnel or "direction of Local Control Centers" for Reliability Coordinator personnel .

"Request Reliability Coordinator to mitigate equipment overloads." implies that the Transmission Operator is not the Reliability Coordinator.

R 1.1 should be changed as follows: "Coordinate voltage reduction andCoordinate load shedding with, or as directed by, the Reliability Coordinator or Balancing Authority. This is needed to be consistent with R1.1.10 in ORG-002-1.

R2 should state The Transmission Operator shall have a training program that meets the requirements of PER-002 of the NERC Standards. "This standard should not have a separate training requirement or compliance measures that may be different than the Training standard contained in the NERC Manual.

### **Standard – ORG-004-1 – Transmission Operator Certification – Data Acquisition and Monitoring**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

4. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Data Acquisition and Monitoring standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-007-1 – Transmission Operator Certification – Loss of Control Center Functionality**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

5. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Loss of Control Center Functionality standard? If not, please explain in the comment area.

Yes

No

Comments:

6. During the 2<sup>nd</sup> posting of the TOP Certification Standards, industry consensus was obtained for the Introduction, Requirements, Measures, and Compliance elements of:

**ORG-005 - Transmission Operator Certification — System Analysis**

**ORG-006 - Transmission Operator Certification — Emergency Operations**

**ORG-008 - Transmission Operator Certification — Restoration.**

The Drafting Team is not asking any specific questions related to these standards, but is providing an opportunity for comments related to them.

Comments: None

7. Please identify any elements that should be included in the standards that have not been identified?

Comments: None

8. Please identify any regional differences that should be included in the standards? (Please identify the standard, the requirement, and specific difference that needs to be included in the requirement)

Comments: None

9. Do you agree with the proposed implementation plan? If not, please explain in the comment area.

Yes

No

Comments:

10. The Drafting Team believes that the TOP Certification standards are ready for ballot. Do you support this position? If not, please explain in the comment area.

Yes

No

Comments: Provided the changes included above are made to the document prior to the balloting process. Also, consideration should be given to the following:

Need to include a requirement that voltage or load reduction (particularly voltage reduction) will not be directed without documentation of studies potential effectiveness without degrading grid reliability and performance.

Recognize Transmission Operator obligation to specify voltage schedules for generators and RCs obligation to ensure coordination of voltage schedules between Transmission Operators.

**Comment Form – Transmission Operator Certification Standards, Draft 3**

---

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**ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE AND IT IS THEREFORE IMPORTANT TO ADHERE TO THE FOLLOWING REQUIREMENTS:**

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  - Do not use numbering or bullets in any data field.
  - Do not use quotation marks in any data field.
  - Do not submit a response in an unprotected copy of this form.

<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	John Horakh - 10/14/2005
Organization:	MAAC
Telephone:	609-625-6014
Email:	john.horakh@pepcoholdings.com
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
<input type="checkbox"/> ECAR	<input checked="" type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/> 3 - Load-serving Entities
<input checked="" type="checkbox"/> MAAC	<input type="checkbox"/> 4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/> 5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/> 6 - Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input type="checkbox"/> 7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/> 8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/> 9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	
<input type="checkbox"/> NA - Not Applicable	

**Comment Form – Transmission Operator Certification Standards, Draft 3**

---

Group Comments (Complete this page if comments are from a group.)

**Group Name:**

**Lead Contact:**

**Contact Organization:**

**Contact Segment:**

**Contact Telephone:**

**Contact Email:**

Additional Member Name	Additional Member Organization	Region*	Segment*

\*If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

**Background Information:**

To understand the Standard Drafting Team’s philosophy used to create the standard, refer to the Transmission Operator Certification SAR, the Functional Model, and its Technical Discussion Document. These documents were used in the drafting of the standard and can be accessed at the following links:

[ftp://www.nerc.com/pub/sys/all\\_updl/standards/sar/TOP\\_CERTIFICATION\\_01\\_03.pdf](ftp://www.nerc.com/pub/sys/all_updl/standards/sar/TOP_CERTIFICATION_01_03.pdf)  
<http://www.nerc.com/~filez/functionalmode.html>

Changes were made in the drafting of the standard to reflect the revisions made to the Functional Model since the drafting of the SAR.

The Certification Standard Drafting Team would like to receive industry comments on this group of standards. Accordingly, we request your comments included on this form, emailed to [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the subject “Transmission Operator Certification Standards Comments” by **October 15, 2005**.

**Standard – ORG-001-1 – Transmission Operator Certification – Certification**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard. In addition, the Drafting Team removed the requirement of a site-visit because it was redundant with the elements of the administrative process. The removal of this requirement does not eliminate the need for a site visit from the process, but merely places the elements in the certification administrative process.

1. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Certification standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-002-1 – Transmission Operator Certification – Agreements**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting Team has made modification to provide clarification to the standard. In addition, the Drafting Team has removed the requirement for the TOP to sign the NERC Confidentiality Agreement. It was identified during the comment period that some TOPs can perform their responsibilities without having access to this ISN data. If this can be accomplished, there is no justification for this requirement. The removal of this requirement from the standard does not eliminate the need to sign the confidentiality agreement if the entity requires access to the ISN data.

2. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Agreements standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-003-1 – Transmission Operator Certification – Personnel**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

3. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Personnel standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-004-1 – Transmission Operator Certification – Data Acquisition and Monitoring**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

4. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Data Acquisition and Monitoring standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-007-1 – Transmission Operator Certification – Loss of Control Center Functionality**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

5. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Loss of Control Center Functionality standard? If not, please explain in the comment area.

Yes

No

Comments:

6. During the 2<sup>nd</sup> posting of the TOP Certification Standards, industry consensus was obtained for the Introduction, Requirements, Measures, and Compliance elements of:

**ORG-005 - Transmission Operator Certification — System Analysis**

**ORG-006 - Transmission Operator Certification — Emergency Operations**

**ORG-008 - Transmission Operator Certification — Restoration.**

The Drafting Team is not asking any specific questions related to these standards, but is providing an opportunity for comments related to them.

Comments: None

7. Please identify any elements that should be included in the standards that have not been identified?

Comments: None

**Comment Form – Transmission Operator Certification Standards, Draft 3**

---

8. Please identify any regional differences that should be included in the standards? (Please identify the standard, the requirement, and specific difference that needs to be included in the requirement)

Comments: None

9. Do you agree with the proposed implementation plan? If not, please explain in the comment area.

Yes

No

Comments: The process looks OK, but the first sentence in Item # 7 (Control Area Certification for New Control Areas) should be reworded as follows for clarity. (1) Delete \*after 4/1/2005\* (2) After \*continue\*, add \*using the existing control area certification process\* (3) Delete \*approved\* and replace with \*implemented, April 1, 2006.\*

10. The Drafting Team believes that the TOP Certification standards are ready for ballot. Do you support this position? If not, please explain in the comment area.

Yes

No

Comments:

**Comment Form – Transmission Operator Certification Standards, Draft 3**

---

This form is to be used to submit comments on the proposed Draft 3 of the Transmission Operator Certification Standards. Comments must be submitted by **October 15, 2005**. You may submit the completed form by emailing it to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the words “Transmission Operator Certification Standards Comments” in the subject line. If you have questions please contact Mark Ladrow at [mark.ladrow@nerc.net](mailto:mark.ladrow@nerc.net) or by telephone at 609-452-8060.

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
Email:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 - Transmission Owners
<input type="checkbox"/> ECAR	<input checked="" type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/>	5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	<input type="checkbox"/>	
<input type="checkbox"/> NA - Not Applicable		

**Comment Form – Transmission Operator Certification Standards, Draft 3**

Group Comments (Complete this page if comments are from a group.)

**Group Name:** CP9, Reliability Standards Working Group  
**Lead Contact:** Guy Zito  
**Contact Organization:** Northeast Power Coordinating Council  
**Contact Segment:** 2  
**Contact Telephone:** 212-840-1070  
**Contact Email:** gzito@npcc.org

Additional Member Name	Additional Member Organization	Region*	Segment*
Ralph Rufrano	New York Power Authority	NPCC	1
Peter Lebro	National Grid US	NPCC	1
Roger Champagne	TransEnergie	NPCC	1
David Kiguel	Hydro One	NPCC	1
Al Adamson	New York State Reliability Council	NPCC	2
Khaqan Khan	The IESO (Ontario)	NPCC	2
Greg Campoli	New York ISO	NPCC	2
David Little	Nova Scotia Power	NPCC	1
Kathleen Goodman	ISO New England	NPCC	2
Guy Zito	Northeast Power Coord. Council	NPCC	2

\*If more than one Region or Segment applies, indicate the best fit for the purpose of these comments.  
Regional acronyms and segment numbers are shown on prior page.

**Background Information:**

To understand the Standard Drafting Team's philosophy used to create the standard, refer to the Transmission Operator Certification SAR, the Functional Model, and its Technical Discussion Document. These documents were used in the drafting of the standard and can be accessed at the following links:

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<http://www.nerc.com/~filez/functionalmode.html>

Changes were made in the drafting of the standard to reflect the revisions made to the Functional Model since the drafting of the SAR.

The Certification Standard Drafting Team would like to receive industry comments on this group of standards. Accordingly, we request your comments included on this form, emailed to [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the subject "Transmission Operator Certification Standards Comments" by **October 15, 2005**.

**Standard – ORG-001-1 – Transmission Operator Certification – Certification**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard. In addition, the Drafting Team removed the requirement of a site-visit because it was redundant with the elements of the administrative process. The removal of this requirement does not eliminate the need for a site visit from the process, but merely places the elements in the certification administrative process.

1. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Certification standard? If not, please explain in the comment area.

Yes

No

Comments: R3 implies a single TOP for a Control Area. NERC guidance allows multiple TOPs for a Control Area. The Version 0 Matrix of Requirements by Function identifies tasks are not necessarily under the purview of a single entity. NPCC participating Members request clarification. In many cases there is no delegation of responsibilities in performing certain task but rather agreements that detail which entity performs any given task.

NPCC participating members would suggest a statement such as the following be added to the document;

"Agreements between any entities performing Transmission Operating tasks referenced in R-1 of ORG-002-1 shall not be superceded by those in R-3 in ORG-001-1. The entities signing such agreements must take steps to ensure that all requirements stated in the standards are performed by at least one entity, i.e. there are no gaps in responsibilities."

**Standard – ORG-002-1 – Transmission Operator Certification – Agreements**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting Team has made modification to provide clarification to the standard. In addition, the Drafting Team has removed the requirement for the TOP to sign the NERC Confidentiality Agreement. It was identified during the comment period that some TOPs can perform their responsibilities without having access to this ISN data. If this can be accomplished, there is no justification for this requirement. The removal of this requirement from the standard does not eliminate the need to sign the confidentiality agreement if the entity requires access to the ISN data.

2. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Agreements standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-003-1 – Transmission Operator Certification – Personnel**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

3. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Personnel standard? If not, please explain in the comment area.

Yes

No

Comments: NPCC participating Members recommend that "operate" be removed from the first bullet in R1.1 to demonstrate that field personnel who may physically operate equipment do not require this certification.

R2.1 (training program) is extremely general and completely subjective. This Requirement needs more specificity.

**Standard – ORG-004-1 – Transmission Operator Certification – Data Acquisition and Monitoring**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

4. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Data Acquisition and Monitoring standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-007-1 – Transmission Operator Certification – Loss of Control Center Functionality**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

5. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Loss of Control Center Functionality standard? If not, please explain in the comment area.

Yes

No

Comments: R1, Bullet 5: This is too general and allows much wiggle room. Suggest "Loss of control center building functions, e.g., HVAC, power, water, etc."

Footnote 2 should be "entities" not entities'.

## Comment Form – Transmission Operator Certification Standards, Draft 3

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6. During the 2<sup>nd</sup> posting of the TOP Certification Standards, industry consensus was obtained for the Introduction, Requirements, Measures, and Compliance elements of:

**ORG-005 - Transmission Operator Certification — System Analysis**

**ORG-006 - Transmission Operator Certification — Emergency Operations**

**ORG-008 - Transmission Operator Certification — Restoration.**

The Drafting Team is not asking any specific questions related to these standards, but is providing an opportunity for comments related to them.

Comments: ORG-006, change A3 from Transmission Operators to Transmission Operator

7. Please identify any elements that should be included in the standards that have not been identified?

Comments: See Question 1 Response above.

8. Please identify any regional differences that should be included in the standards? (Please identify the standard, the requirement, and specific difference that needs to be included in the requirement)

Comments:

9. Do you agree with the proposed implementation plan? If not, please explain in the comment area.

Yes

No

Comments:

10. The Drafting Team believes that the TOP Certification standards are ready for ballot. Do you support this position? If not, please explain in the comment area.

Yes

No

Comments: If the above comments are satisfied, then these standards are ready for ballot.

**Comment Form – Transmission Operator Certification Standards, Draft 3**

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  - Do not use quotation marks in any data field.
  - Do not submit a response in an unprotected copy of this form.

<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	David Kiguel	
Organization:	Hydro One Networks Inc.	
Telephone:	416-345-5313	
Email:	David.Kiguel@HydroOne.com	
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	3 - Load-serving Entities
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<input type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	<input type="checkbox"/>	
<input type="checkbox"/> NA - Not Applicable	<input type="checkbox"/>	

**Comment Form – Transmission Operator Certification Standards, Draft 3**

Group Comments (Complete this page if comments are from a group.)

**Group Name:**

**Lead Contact:**

**Contact Organization:**

**Contact Segment:**

**Contact Telephone:**

**Contact Email:**

Additional Member Name	Additional Member Organization	Region*	Segment*

\*If more than one Region or Segment applies, indicate the best fit for the purpose of these comments.  
Regional acronyms and segment numbers are shown on prior page.

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<http://www.nerc.com/~filez/functionalmode.html>

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The Certification Standard Drafting Team would like to receive industry comments on this group of standards. Accordingly, we request your comments included on this form, emailed to [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the subject “Transmission Operator Certification Standards Comments” by **October 15, 2005**.

**Standard – ORG-001-1 – Transmission Operator Certification – Certification**

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1. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Certification standard? If not, please explain in the comment area.

Yes

No

Comments: R3 implies a single TOP for a Control Area. NERC guidance on entity registration allows multiple TOPs for a Control Area. The Version 0 Matrix of Requirements by Function identifies tasks are not necessarily under the purview of a single entity. In many cases there is no delegation of responsibilities to perform certain tasks but rather regulatory allocation of roles and/or agreements that detail which entity has the responsibility of performing any given task. An entity cannot delegate the responsibility for performing a task if that entity did not have such responsibility in the first place.

Hydro One suggests a statement such as the following be added to the document:

"Agreements between any entities performing Transmission Operating tasks referenced in R1 of ORG-002-1 and other local rules/codes shall not be superceded by those in R3 in ORG-001-1. The entities signing such agreements must take steps to ensure that all requirements stated in the standards are performed by at least one entity, i.e. there are no gaps in responsibilities."

The problem originates in the definition of TOP in the Functional Model which defines TOP as an entity that operates OR directs the operation of the BES. Hydro One believes that the Functional Model must be modified to separate the direction function (usually performed by ISOs) from the actual operation (switching) usually performed by TOs.

**Standard – ORG-002-1 – Transmission Operator Certification – Agreements**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting Team has made modification to provide clarification to the standard. In addition, the Drafting Team has removed the requirement for the TOP to sign the NERC Confidentiality Agreement. It was identified during the comment period that some TOPs can perform their responsibilities without having access to this ISN data. If this can be accomplished, there is no justification for this requirement. The removal of this requirement from the standard does not eliminate the need to sign the confidentiality agreement if the entity requires access to the ISN data.

2. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Agreements standard? If not, please explain in the comment area.

Yes

No

Comments: R1 should be modified to include agreements among TOPs in the same Area.

**Standard – ORG-003-1 – Transmission Operator Certification – Personnel**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

3. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Personnel standard? If not, please explain in the comment area.

Yes

No

Comments: We recommend that "operate" be removed from the first bullet in R1.1 to demonstrate that field personnel who may physically operate equipment do not require this certification.

R2.1 (training program) is extremely general and completely subjective. This Requirement needs more specificity.

**Standard – ORG-004-1 – Transmission Operator Certification – Data Acquisition and Monitoring**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

4. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Data Acquisition and Monitoring standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-007-1 – Transmission Operator Certification – Loss of Control Center Functionality**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

5. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Loss of Control Center Functionality standard? If not, please explain in the comment area.

Yes

No

## Comment Form – Transmission Operator Certification Standards, Draft 3

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Comments: R1, Bullet 5: This is too general and allows much wiggle room. Suggest “Loss of control center building functions, e.g., HVAC, power, water, etc.”

Footnote 2 should be "entities" not entities'.

6. During the 2<sup>nd</sup> posting of the TOP Certification Standards, industry consensus was obtained for the Introduction, Requirements, Measures, and Compliance elements of:

**ORG-005 - Transmission Operator Certification — System Analysis**

**ORG-006 - Transmission Operator Certification — Emergency Operations**

**ORG-008 - Transmission Operator Certification — Restoration.**

The Drafting Team is not asking any specific questions related to these standards, but is providing an opportunity for comments related to them.

Comments: ORG-006, change A3 from Transmission Operators to Transmission Operator

7. Please identify any elements that should be included in the standards that have not been identified?

Comments: See Comments on Questions 1 and 2 above.

8. Please identify any regional differences that should be included in the standards? (Please identify the standard, the requirement, and specific difference that needs to be included in the requirement)

Comments:

9. Do you agree with the proposed implementation plan? If not, please explain in the comment area.

Yes

No

Comments:

10. The Drafting Team believes that the TOP Certification standards are ready for ballot. Do you support this position? If not, please explain in the comment area.

Yes

No

Comments: If the above comments are satisfied, then these standards are ready for ballot.

**Comment Form – Transmission Operator Certification Standards, Draft 3**

---

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  - Do submit any formatted text or markups in a separate WORD file.

- DO NOT:**
- Do not insert tabs or paragraph returns in any data field.
  - Do not use numbering or bullets in any data field.
  - Do not use quotation marks in any data field.
  - Do not submit a response in an unprotected copy of this form.

<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	John Jonte	
Organization:	CenterPoint Energy	
Telephone:	713-207-2252	
Email:	john.jonte@centerpointenergy.com	
NERC Region	Registered Ballot Body Segment	
<input checked="" type="checkbox"/> <b>ERCOT</b>	<input checked="" type="checkbox"/> 1 - Transmission Owners	
<input type="checkbox"/> <b>ECAR</b>	<input type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils	
<input type="checkbox"/> <b>FRCC</b>	<input type="checkbox"/> 3 - Load-serving Entities	
<input type="checkbox"/> <b>MAAC</b>	<input type="checkbox"/> 4 - Transmission-dependent Utilities	
<input type="checkbox"/> <b>MAIN</b>	<input type="checkbox"/> 5 - Electric Generators	
<input type="checkbox"/> <b>MAPP</b>	<input type="checkbox"/> 6 - Electricity Brokers, Aggregators, and Marketers	
<input type="checkbox"/> <b>NPCC</b>	<input type="checkbox"/> 7 - Large Electricity End Users	
<input type="checkbox"/> <b>SERC</b>	<input type="checkbox"/> 8 - Small Electricity End Users	
<input type="checkbox"/> <b>SPP</b>	<input type="checkbox"/> 9 - Federal, State, Provincial Regulatory or other Government Entities	
<input type="checkbox"/> <b>WECC</b>		
<input type="checkbox"/> <b>NA - Not Applicable</b>		

**Comment Form – Transmission Operator Certification Standards, Draft 3**

Group Comments (Complete this page if comments are from a group.)

**Group Name:**

**Lead Contact:**

**Contact Organization:**

**Contact Segment:**

**Contact Telephone:**

**Contact Email:**

<b>Additional Member Name</b>	<b>Additional Member Organization</b>	<b>Region*</b>	<b>Segment*</b>
Dennis Caufield	CenterPoint Energy	ERCOT	1

\*If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

**Background Information:**

To understand the Standard Drafting Team’s philosophy used to create the standard, refer to the Transmission Operator Certification SAR, the Functional Model, and its Technical Discussion Document. These documents were used in the drafting of the standard and can be accessed at the following links:

[ftp://www.nerc.com/pub/sys/all\\_updl/standards/sar/TOP\\_CERTIFICATION\\_01\\_03.pdf](ftp://www.nerc.com/pub/sys/all_updl/standards/sar/TOP_CERTIFICATION_01_03.pdf)  
<http://www.nerc.com/~filez/functionalmode.html>

Changes were made in the drafting of the standard to reflect the revisions made to the Functional Model since the drafting of the SAR.

The Certification Standard Drafting Team would like to receive industry comments on this group of standards. Accordingly, we request your comments included on this form, emailed to [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the subject “Transmission Operator Certification Standards Comments” by **October 15, 2005**.

**Standard – ORG-001-1 – Transmission Operator Certification – Certification**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard. In addition, the Drafting Team removed the requirement of a site-visit because it was redundant with the elements of the administrative process. The removal of this requirement does not eliminate the need for a site visit from the process, but merely places the elements in the certification administrative process.

1. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Certification standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-002-1 – Transmission Operator Certification – Agreements**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting Team has made modification to provide clarification to the standard. In addition, the Drafting Team has removed the requirement for the TOP to sign the NERC Confidentiality Agreement. It was identified during the comment period that some TOPs can perform their responsibilities without having access to this ISN data. If this can be accomplished, there is no justification for this requirement. The removal of this requirement from the standard does not eliminate the need to sign the confidentiality agreement if the entity requires access to the ISN data.

2. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Agreements standard? If not, please explain in the comment area.

Yes

No

Comments: If one entity has multiple reliability roles( i.e. an RC is also the BA and /or TO) it's internal documentation must clearly define it's own authority & responsibilities in conjunction with the agreements with other entities. Each entities responsibilities (including delegated responsibilities) must be clearly defined, especially concerning emergency operations, curtailments and load shedding.

**Standard – ORG-003-1 – Transmission Operator Certification – Personnel**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

3. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Personnel standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-004-1 – Transmission Operator Certification – Data Acquisition and Monitoring**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

4. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Data Acquisition and Monitoring standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-007-1 – Transmission Operator Certification – Loss of Control Center Functionality**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

5. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Loss of Control Center Functionality standard? If not, please explain in the comment area.

Yes

No

Comments:

6. During the 2<sup>nd</sup> posting of the TOP Certification Standards, industry consensus was obtained for the Introduction, Requirements, Measures, and Compliance elements of:

**ORG-005 - Transmission Operator Certification — System Analysis**

**ORG-006 - Transmission Operator Certification — Emergency Operations**

**ORG-008 - Transmission Operator Certification — Restoration.**

The Drafting Team is not asking any specific questions related to these standards, but is providing an opportunity for comments related to them.

Comments:

7. Please identify any elements that should be included in the standards that have not been identified?

Comments:

8. Please identify any regional differences that should be included in the standards? (Please identify the standard, the requirement, and specific difference that needs to be included in the requirement)

Comments: CenterPoint Energy differs to ERCOT to comment on regional differences

9. Do you agree with the proposed implementation plan? If not, please explain in the comment area.

Yes

No

Comments:

10. The Drafting Team believes that the TOP Certification standards are ready for ballot. Do you support this position? If not, please explain in the comment area.

Yes

No

Comments:

**Comment Form – Transmission Operator Certification Standards, Draft 3**

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  - Do not submit a response in an unprotected copy of this form.

<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Kathleen A. Davis	
Organization:	Tennessee Valley Authority	
Telephone:	423-751-6172	
Email:	kadavis@tva.gov	
NERC Region	Registered Ballot Body Segment	
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/>	5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users
<input checked="" type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC		
<input type="checkbox"/> NA - Not Applicable		

Group Comments (Complete this page if comments are from a group.)

**Group Name:**

**Lead Contact:**

**Contact Organization:**

**Contact Segment:**

**Contact Telephone:**

**Contact Email:**

Additional Member Name	Additional Member Organization	Region*	Segment*
Chris Donilon	TVA	SERC	1

\*If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

**Background Information:**

To understand the Standard Drafting Team’s philosophy used to create the standard, refer to the Transmission Operator Certification SAR, the Functional Model, and its Technical Discussion Document. These documents were used in the drafting of the standard and can be accessed at the following links:

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Changes were made in the drafting of the standard to reflect the revisions made to the Functional Model since the drafting of the SAR.

The Certification Standard Drafting Team would like to receive industry comments on this group of standards. Accordingly, we request your comments included on this form, emailed to [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the subject “Transmission Operator Certification Standards Comments” by **October 15, 2005**.

**Standard – ORG-001-1 – Transmission Operator Certification – Certification**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard. In addition, the Drafting Team removed the requirement of a site-visit because it was redundant with the elements of the administrative process. The removal of this requirement does not eliminate the need for a site visit from the process, but merely places the elements in the certification administrative process.

1. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Certification standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-002-1 – Transmission Operator Certification – Agreements**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting Team has made modification to provide clarification to the standard. In addition, the Drafting Team has removed the requirement for the TOP to sign the NERC Confidentiality Agreement. It was identified during the comment period that some TOPs can perform their responsibilities without having access to this ISN data. If this can be accomplished, there is no justification for this requirement. The removal of this requirement from the standard does not eliminate the need to sign the confidentiality agreement if the entity requires access to the ISN data.

2. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Agreements standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-003-1 – Transmission Operator Certification – Personnel**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

3. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Personnel standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-004-1 – Transmission Operator Certification – Data Acquisition and Monitoring**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

4. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Data Acquisition and Monitoring standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-007-1 – Transmission Operator Certification – Loss of Control Center Functionality**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

5. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Loss of Control Center Functionality standard? If not, please explain in the comment area.

Yes

No

Comments:

6. During the 2<sup>nd</sup> posting of the TOP Certification Standards, industry consensus was obtained for the Introduction, Requirements, Measures, and Compliance elements of:

**ORG-005 - Transmission Operator Certification — System Analysis**

**ORG-006 - Transmission Operator Certification — Emergency Operations**

**ORG-008 - Transmission Operator Certification — Restoration.**

The Drafting Team is not asking any specific questions related to these standards, but is providing an opportunity for comments related to them.

Comments: none

7. Please identify any elements that should be included in the standards that have not been identified?

Comments: none

**Comment Form – Transmission Operator Certification Standards, Draft 3**

---

8. Please identify any regional differences that should be included in the standards? (Please identify the standard, the requirement, and specific difference that needs to be included in the requirement)

Comments: none

9. Do you agree with the proposed implementation plan? If not, please explain in the comment area.

Yes

No

Comments:

10. The Drafting Team believes that the TOP Certification standards are ready for ballot. Do you support this position? If not, please explain in the comment area.

Yes

No

Comments:

**Comment Form – Transmission Operator Certification Standards, Draft 3**

---

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Robert Coish	
Organization:	Manitoba Hydro	
Telephone:	204-487-5479	
Email:	rgcoish@hydro.mb.ca	
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils
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<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	<input type="checkbox"/>	
<input type="checkbox"/> NA - Not Applicable	<input type="checkbox"/>	



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1. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Certification standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-002-1 – Transmission Operator Certification – Agreements**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting Team has made modification to provide clarification to the standard. In addition, the Drafting Team has removed the requirement for the TOP to sign the NERC Confidentiality Agreement. It was identified during the comment period that some TOPs can perform their responsibilities without having access to this ISN data. If this can be accomplished, there is no justification for this requirement. The removal of this requirement from the standard does not eliminate the need to sign the confidentiality agreement if the entity requires access to the ISN data.

2. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Agreements standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-003-1 – Transmission Operator Certification – Personnel**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

3. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Personnel standard? If not, please explain in the comment area.

Yes

No

Comments: However, R2.1, “The Transmission Operator shall have a training program that addresses the knowledge and competencies required for reliable system operations.” is vague and may be hard to measure

**Standard – ORG-004-1 – Transmission Operator Certification – Data Acquisition and Monitoring**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

4. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Data Acquisition and Monitoring standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-007-1 – Transmission Operator Certification – Loss of Control Center Functionality**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

5. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Loss of Control Center Functionality standard? If not, please explain in the comment area.

Yes

No

Comments: (1) The MH does recognize that certification standards must be complementary to reliability standards and that certification is measuring preparedness while the other standards, in general, are measuring performance. However, it seems the SDT is not recognizing the concern that, as a fundamental principle, requirements for certification should not exceed requirements after certification. This standard should not formulate requirements that go beyond the requirements found in EOP-008. It would not be sensible to require companies to allocate more resources to meeting Loss of Control Center Functionality requirements prior to certification than they are required to allocate during ongoing operations, as covered in EOP-008. The requirements to be prepared to perform a function should not exceed the requirements for performing the function. Regarding R2.3, R2.6 and R2.10 in ORG-007-1, does having procedures in place that relies on sending people to the field to monitor information, and then calling that information back to a control center, meet these requirements? What is meant by "in real-time"? (2) In R2 change "and tools" to "or tools".

6. During the 2<sup>nd</sup> posting of the TOP Certification Standards, industry consensus was obtained for the Introduction, Requirements, Measures, and Compliance elements of:

**ORG-005 - Transmission Operator Certification — System Analysis**

**ORG-006 - Transmission Operator Certification — Emergency Operations**

**ORG-008 - Transmission Operator Certification — Restoration.**

The Drafting Team is not asking any specific questions related to these standards, but is providing an opportunity for comments related to them.

Comments: (1) The MH does not agree with ORG-005-1. In R1 to R5 of ORG-005-1 the words "shall perform" or "shall", as applicable, should be replaced by "shall have procedures, processes, and/or tools to be able to " (as appropriate). (2) In ORG-008-1, M1 delete "and R2" because R2 doesn't require that the Transmission Operator have a document. M1 should otherwise be modified to be a measure of the TO having provided its restoration plan to its Reliability Coordinator.

7. Please identify any elements that should be included in the standards that have not been identified?

Comments: The MH suggests that the SDT consider adding language to the certification standards that reflects the fundamental principle that the requirements for certification do not exceed requirements after certification (i.e. as specified in the rest of the NERC reliability standards).

8. Please identify any regional differences that should be included in the standards? (Please identify the standard, the requirement, and specific difference that needs to be included in the requirement)

Comments: None.

9. Do you agree with the proposed implementation plan? If not, please explain in the comment area.

Yes

No

Comments: However, the MH would like to see that the NERC process for certification includes a reasonable time line for required agreements, that do not already exist, to be put in place.

10. The Drafting Team believes that the TOP Certification standards are ready for ballot. Do you support this position? If not, please explain in the comment area.

Yes

No

## **Comment Form – Transmission Operator Certification Standards, Draft 3**

---

Comments: MH would like to see the TOP Certification Standards modified or clarified according to our comments.

**Comment Form – Transmission Operator Certification Standards, Draft 3**

---

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- DO NOT:**
- Do not insert tabs or paragraph returns in any data field.
  - Do not use numbering or bullets in any data field.
  - Do not use quotation marks in any data field.
  - Do not submit a response in an unprotected copy of this form.

<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	Kathleen Goodman
Organization:	ISO New England
Telephone:	(413) 535-4111
Email:	kgoodman@iso-ne.com
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
<input type="checkbox"/> ECAR	<input checked="" type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/> 3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/> 4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/> 5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/> 6 - Electricity Brokers, Aggregators, and Marketers
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/> 7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/> 8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/> 9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	
<input type="checkbox"/> NA - Not Applicable	



**Background Information:**

To understand the Standard Drafting Team’s philosophy used to create the standard, refer to the Transmission Operator Certification SAR, the Functional Model, and its Technical Discussion Document. These documents were used in the drafting of the standard and can be accessed at the following links:

[ftp://www.nerc.com/pub/sys/all\\_updl/standards/sar/TOP\\_CERTIFICATION\\_01\\_03.pdf](ftp://www.nerc.com/pub/sys/all_updl/standards/sar/TOP_CERTIFICATION_01_03.pdf)  
<http://www.nerc.com/~filez/functionalmode.html>

Changes were made in the drafting of the standard to reflect the revisions made to the Functional Model since the drafting of the SAR.

The Certification Standard Drafting Team would like to receive industry comments on this group of standards. Accordingly, we request your comments included on this form, emailed to [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the subject “Transmission Operator Certification Standards Comments” by **October 15, 2005**.

**Standard – ORG-001-1 – Transmission Operator Certification – Certification**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard. In addition, the Drafting Team removed the requirement of a site-visit because it was redundant with the elements of the administrative process. The removal of this requirement does not eliminate the need for a site visit from the process, but merely places the elements in the certification administrative process.

1. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Certification standard? If not, please explain in the comment area.

Yes

No

Comments: R3 implies a single TOP for each Control Area. NERC guidance has allowed multiple TOPs to register with a single Control Area. The Version 0 Matrix of Requirements by Function identifies tasks are not necessarily under the purview of a single entity. We request clarification from NERC or the Drafting Team on which is appropriate. In many cases there is no delegation of responsibilities in performing certain task but rather agreements that detail which entity performs any given task.

ISO New England further suggests a statement such as the following be added to the document: "Agreements between any entities performing Transmission Operating tasks referenced in R-1 of ORG-002-1 shall not be superceded by those in R-3 in ORG-001-1. The entities signing such agreements must take steps to ensure that all requirements stated in the standards are performed by at least one entity, i.e. there are no gaps in responsibilities."

**Standard – ORG-002-1 – Transmission Operator Certification – Agreements**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting Team has made modification to provide clarification to the standard. In addition, the Drafting Team has removed the requirement for the TOP to sign the NERC Confidentiality Agreement. It was identified during the comment period that some TOPs can perform their responsibilities without having access to this ISN data. If this can be accomplished, there is no justification for this requirement. The removal of this requirement from the standard does not eliminate the need to sign the confidentiality agreement if the entity requires access to the ISN data.

2. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Agreements standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-003-1 – Transmission Operator Certification – Personnel**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

3. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Personnel standard? If not, please explain in the comment area.

Yes

No

Comments: ISO New England recommends the word "operate" be removed from the first bullet in R1.1 to demonstrate that field personnel who may physically operate equipment do not necessarily require this certification.

R2.1 (training program) is extremely general and completely subjective. This Requirement needs more specificity.

**Standard – ORG-004-1 – Transmission Operator Certification – Data Acquisition and Monitoring**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

4. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Data Acquisition and Monitoring standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-007-1 – Transmission Operator Certification – Loss of Control Center Functionality**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

5. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Loss of Control Center Functionality standard? If not, please explain in the comment area.

Yes

No

Comments: R1, Bullet 5: This is too general; suggest changing to "Loss of control center building functions, e.g., HVAC, power, water, etc."

Footnote 2 should be "entities" not entities'.

## Comment Form – Transmission Operator Certification Standards, Draft 3

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6. During the 2<sup>nd</sup> posting of the TOP Certification Standards, industry consensus was obtained for the Introduction, Requirements, Measures, and Compliance elements of:

**ORG-005 - Transmission Operator Certification — System Analysis**

**ORG-006 - Transmission Operator Certification — Emergency Operations**

**ORG-008 - Transmission Operator Certification — Restoration.**

The Drafting Team is not asking any specific questions related to these standards, but is providing an opportunity for comments related to them.

Comments: ORG-006, change A3 from Transmission Operators to Transmission Operator

7. Please identify any elements that should be included in the standards that have not been identified?

Comments: See Question 1 Response above.

8. Please identify any regional differences that should be included in the standards? (Please identify the standard, the requirement, and specific difference that needs to be included in the requirement)

Comments:

9. Do you agree with the proposed implementation plan? If not, please explain in the comment area.

Yes

No

Comments:

10. The Drafting Team believes that the TOP Certification standards are ready for ballot. Do you support this position? If not, please explain in the comment area.

Yes

No

Comments: If the above comments are satisfied, then these standards are ready for ballot.

**Comment Form – Transmission Operator Certification Standards, Draft 3**

This form is to be used to submit comments on the proposed Draft 3 of the Transmission Operator Certification Standards. Comments must be submitted by **October 15, 2005**. You may submit the completed form by emailing it to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the words “Transmission Operator Certification Standards Comments” in the subject line. If you have questions please contact Mark Ladrow at [mark.ladrow@nerc.net](mailto:mark.ladrow@nerc.net) or by telephone at 609-452-8060.

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<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	Lisa A. Szot
Organization:	California ISO
Telephone:	916-351-2177
Email:	lszot@caiso.com
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
<input type="checkbox"/> ECAR	<input checked="" type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/> 3 - Load-serving Entities
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<input type="checkbox"/> MAIN	<input type="checkbox"/> 5 - Electric Generators
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<input type="checkbox"/> WECC	
<input type="checkbox"/> NA - Not Applicable	



**Background Information:**

To understand the Standard Drafting Team’s philosophy used to create the standard, refer to the Transmission Operator Certification SAR, the Functional Model, and its Technical Discussion Document. These documents were used in the drafting of the standard and can be accessed at the following links:

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**Standard – ORG-001-1 – Transmission Operator Certification – Certification**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard. In addition, the Drafting Team removed the requirement of a site-visit because it was redundant with the elements of the administrative process. The removal of this requirement does not eliminate the need for a site visit from the process, but merely places the elements in the certification administrative process.

1. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Certification standard? If not, please explain in the comment area.

Yes

No

Comments: Please define "NERC certification process transmission operators".

**Standard – ORG-002-1 – Transmission Operator Certification – Agreements**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting Team has made modification to provide clarification to the standard. In addition, the Drafting Team has removed the requirement for the TOP to sign the NERC Confidentiality Agreement. It was identified during the comment period that some TOPs can perform their responsibilities without having access to this ISN data. If this can be accomplished, there is no justification for this requirement. The removal of this requirement from the standard does not eliminate the need to sign the confidentiality agreement if the entity requires access to the ISN data.

2. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Agreements standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-003-1 – Transmission Operator Certification – Personnel**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

3. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Personnel standard? If not, please explain in the comment area.

Yes

No

Comments: This Requirement needs more specificity. Does the term "operate" mean that personnel that physically operate this system need to be certified?

**Standard – ORG-004-1 – Transmission Operator Certification – Data Acquisition and Monitoring**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

4. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Data Acquisition and Monitoring standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-007-1 – Transmission Operator Certification – Loss of Control Center Functionality**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

5. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Loss of Control Center Functionality standard? If not, please explain in the comment area.

Yes

No

Comments: This is too general, needs more specificity.

6. During the 2<sup>nd</sup> posting of the TOP Certification Standards, industry consensus was obtained for the Introduction, Requirements, Measures, and Compliance elements of:

**ORG-005 - Transmission Operator Certification — System Analysis**

**ORG-006 - Transmission Operator Certification — Emergency Operations**

**ORG-008 - Transmission Operator Certification — Restoration.**

The Drafting Team is not asking any specific questions related to these standards, but is providing an opportunity for comments related to them.

Comments:

In ORG-006, change A3 from Transmission Operators to Transmission Operator

7. Please identify any elements that should be included in the standards that have not been identified?

Comments: . There is a concern regarding the consistency, or lack thereof, of TOP registrations already performed, and the various interpretations within the industry of what constitutes a TOP.

There should be consistency in registration and ultimately certification. Our understanding is that

## Comment Form – Transmission Operator Certification Standards, Draft 3

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these issues are under consideration at the Functional Model Working Group and we would ask that these guidelines be developed and included in the revised Functional Model or be included in the implementation plan for the TOP Certification Standard.

8. Please identify any regional differences that should be included in the standards? (Please identify the standard, the requirement, and specific difference that needs to be included in the requirement)

Comments:

9. Do you agree with the proposed implementation plan? If not, please explain in the comment area.

Yes

No

Comments: The implementation and application of this standard in terms of coordination with other Functional Model related entities should need to allow for a transition period until the other FM related entities are either fully registered or certified. Moreover, these entities (such as GOP, DP, etc..) need to be clearly defined and registered/certified before the implementation of this certification standard.

10. The Drafting Team believes that the TOP Certification standards are ready for ballot. Do you support this position? If not, please explain in the comment area.

Yes

No

Comments: Once the above comments are satisfied then these will be ready for balloting.

**Comment Form – Transmission Operator Certification Standards, Draft 3**

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<b>Individual Commenter Information</b>		
<b>(Complete this page for comments from one organization or individual.)</b>		
Name:	William J. Smith	
Organization:	Allegheny Power	
Telephone:	(724) 838-6552	
Email:	wsmith1@alleghenypower.com	
NERC Region	Registered Ballot Body Segment	
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/> 1 - Transmission Owners	
<input checked="" type="checkbox"/> ECAR	<input type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils	
<input type="checkbox"/> FRCC	<input type="checkbox"/> 3 - Load-serving Entities	
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<input type="checkbox"/> NPCC	<input type="checkbox"/> 7 - Large Electricity End Users	
<input type="checkbox"/> SERC	<input type="checkbox"/> 8 - Small Electricity End Users	
<input type="checkbox"/> SPP	<input type="checkbox"/> 9 - Federal, State, Provincial Regulatory or other Government Entities	
<input type="checkbox"/> WECC		
<input type="checkbox"/> NA - Not Applicable		

**Comment Form – Transmission Operator Certification Standards, Draft 3**

Group Comments (Complete this page if comments are from a group.)

**Group Name:**  
**Lead Contact:**  
**Contact Organization:**  
**Contact Segment:**  
**Contact Telephone:**  
**Contact Email:**

Additional Member Name	Additional Member Organization	Region*	Segment*

\*If more than one Region or Segment applies, indicate the best fit for the purpose of these comments.  
Regional acronyms and segment numbers are shown on prior page.

**Background Information:**

To understand the Standard Drafting Team’s philosophy used to create the standard, refer to the Transmission Operator Certification SAR, the Functional Model, and its Technical Discussion Document. These documents were used in the drafting of the standard and can be accessed at the following links:

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**Standard – ORG-001-1 – Transmission Operator Certification – Certification**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard. In addition, the Drafting Team removed the requirement of a site-visit because it was redundant with the elements of the administrative process. The removal of this requirement does not eliminate the need for a site visit from the process, but merely places the elements in the certification administrative process.

1. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Certification standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-002-1 – Transmission Operator Certification – Agreements**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting Team has made modification to provide clarification to the standard. In addition, the Drafting Team has removed the requirement for the TOP to sign the NERC Confidentiality Agreement. It was identified during the comment period that some TOPs can perform their responsibilities without having access to this ISN data. If this can be accomplished, there is no justification for this requirement. The removal of this requirement from the standard does not eliminate the need to sign the confidentiality agreement if the entity requires access to the ISN data.

2. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Agreements standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-003-1 – Transmission Operator Certification – Personnel**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

3. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Personnel standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-004-1 – Transmission Operator Certification – Data Acquisition and Monitoring**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

4. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Data Acquisition and Monitoring standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-007-1 – Transmission Operator Certification – Loss of Control Center Functionality**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

5. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Loss of Control Center Functionality standard? If not, please explain in the comment area.

Yes

No

Comments:

6. During the 2<sup>nd</sup> posting of the TOP Certification Standards, industry consensus was obtained for the Introduction, Requirements, Measures, and Compliance elements of:

**ORG-005 - Transmission Operator Certification — System Analysis**

**ORG-006 - Transmission Operator Certification — Emergency Operations**

**ORG-008 - Transmission Operator Certification — Restoration.**

The Drafting Team is not asking any specific questions related to these standards, but is providing an opportunity for comments related to them.

Comments: No comments

7. Please identify any elements that should be included in the standards that have not been identified?

Comments: None

**Comment Form – Transmission Operator Certification Standards, Draft 3**

---

8. Please identify any regional differences that should be included in the standards? (Please identify the standard, the requirement, and specific difference that needs to be included in the requirement)

Comments: None

9. Do you agree with the proposed implementation plan? If not, please explain in the comment area.

Yes

No

Comments:

10. The Drafting Team believes that the TOP Certification standards are ready for ballot. Do you support this position? If not, please explain in the comment area.

Yes

No

Comments:

**Comment Form – Transmission Operator Certification Standards, Draft 3**

---

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<b>Individual Commenter Information</b>		
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Name:		
Organization:		
Telephone:		
Email:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 - Transmission Owners
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<input type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users
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<input type="checkbox"/> WECC		
<input type="checkbox"/> NA - Not Applicable		

**Comment Form – Transmission Operator Certification Standards, Draft 3**

---

Group Comments (Complete this page if comments are from a group.)

**Group Name:** Midwest Reliability Organization  
**Lead Contact:** Robert Coish  
**Contact Organization:** Midwest Reliability Organization  
**Contact Segment:** 2  
**Contact Telephone:** 204-487-5479  
**Contact Email:** rgcoish@hydro.mb.ca

<b>Additional Member Name</b>	<b>Additional Member Organization</b>	<b>Region*</b>	<b>Segment*</b>
Terry Bilke	MISO	MRO	2
Dennis Florom	Lincoln Electric System	MRO	2
Wayne Guttormson	SPC	MRO	2
Ken Goldsmith	ALT	MRO	2
Todd Gosnell	OPPD	MRO	2
Alan Boesch	NPPD	MRO	2
Jim Maenner	WPS	MRO	2
Darrick Moe	WAPA	MRO	2
Tom Mielnik	MEC	MRO	2
Joe Knight	MRO	MRO	2
The 31 Additional	Companies not	MRO	2
MRO Member	Not named above		

\*If more than one Region or Segment applies, indicate the best fit for the purpose of these comments.  
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Yes

No

Comments:

**Standard – ORG-002-1 – Transmission Operator Certification – Agreements**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting Team has made modification to provide clarification to the standard. In addition, the Drafting Team has removed the requirement for the TOP to sign the NERC Confidentiality Agreement. It was identified during the comment period that some TOPs can perform their responsibilities without having access to this ISN data. If this can be accomplished, there is no justification for this requirement. The removal of this requirement from the standard does not eliminate the need to sign the confidentiality agreement if the entity requires access to the ISN data.

2. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Agreements standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-003-1 – Transmission Operator Certification – Personnel**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

3. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Personnel standard? If not, please explain in the comment area.

Yes

No

Comments: However, R2.1, “The Transmission Operator shall have a training program that addresses the knowledge and competencies required for reliable system operations.” is vague and may be hard to measure

**Standard – ORG-004-1 – Transmission Operator Certification – Data Acquisition and Monitoring**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

4. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Data Acquisition and Monitoring standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-007-1 – Transmission Operator Certification – Loss of Control Center Functionality**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

5. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Loss of Control Center Functionality standard? If not, please explain in the comment area.

Yes

No

Comments: (1) The MRO does recognize that certification standards must be complementary to reliability standards and that certification is measuring preparedness while the other standards, in general, are measuring performance. However, it seems the SDT is not recognizing the MRO concern that, as a fundamental principle, requirements for certification should not exceed requirements after certification. This standard should not formulate requirements that go beyond the requirements found in EOP-008. It would not be sensible to require companies to allocate more resources to meeting Loss of Control Center Functionality requirements prior to certification than they are required to allocate during ongoing operations, as covered in EOP-008. The requirements to be prepared to perform a function should not exceed the requirements for performing the function. Regarding R2.3, R2.6 and R2.10 in ORG-007-1, does having procedures in place that relies on sending people to the field to monitor information, and then calling that information back to a control center, meet these requirements? What is meant by "in real-time"? (2) In R2 change "and tools" to "or tools".

6. During the 2<sup>nd</sup> posting of the TOP Certification Standards, industry consensus was obtained for the Introduction, Requirements, Measures, and Compliance elements of:

**ORG-005 - Transmission Operator Certification — System Analysis**

**ORG-006 - Transmission Operator Certification — Emergency Operations**

**ORG-008 - Transmission Operator Certification — Restoration.**

The Drafting Team is not asking any specific questions related to these standards, but is providing an opportunity for comments related to them.

Comments: (1) The MRO does not agree with ORG-005-1. In R1 to R5 of ORG-005-1 the words "shall perform" or "shall", as applicable, should be replaced by "shall have procedures, processes, and/or tools to be able to " (as appropriate). (2) In ORG-008-1, M1 delete "and R2" because R2 doesn't require that the Transmission Operator have a document. M1 should otherwise be modified to be a measure of the TO having provided its restoration plan to its Reliability Coordinator. Also, regarding the SDT response to MRO's comments, the MRO would like to point out that the complementary Reliability Standard to ORG-008-1, EOP-005-0, is to a great extent a measure of the TO's preparedness (not all performance) regarding the capability to restore the system. This is another example where Reliability Standards are not only about performance.

7. Please identify any elements that should be included in the standards that have not been identified?

Comments: The MRO suggests that the SDT consider adding language to the certification standards that reflects the fundamental principle that the requirements for certification do not exceed requirements after certification (i.e. as specified in the rest of the NERC reliability standards).

8. Please identify any regional differences that should be included in the standards? (Please identify the standard, the requirement, and specific difference that needs to be included in the requirement)

Comments: None.

9. Do you agree with the proposed implementation plan? If not, please explain in the comment area.

Yes

No

Comments: However, the MRO would like to see that the NERC process for certification includes a reasonable time line for required agreements, that do not already exist, to be put in place.

**Comment Form – Transmission Operator Certification Standards, Draft 3**

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10. The Drafting Team believes that the TOP Certification standards are ready for ballot. Do you support this position? If not, please explain in the comment area.

Yes

No

Comments: MRO would like to see the TOP Certification Standards modified or clarified according to our comments.

**Comment Form – Transmission Operator Certification Standards, Draft 3**

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  - Do not submit a response in an unprotected copy of this form.

<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	Ron Falsetti
Organization:	Independent Electricity System Operator (IESO), Ontario
Telephone:	905-855-6187
Email:	Ron.Falsetti@ieso.ca
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
<input type="checkbox"/> ECAR	<input checked="" type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/> 3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/> 4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/> 5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/> 6 - Electricity Brokers, Aggregators, and Marketers
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/> 7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/> 8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/> 9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	
<input type="checkbox"/> NA - Not Applicable	



**Background Information:**

To understand the Standard Drafting Team’s philosophy used to create the standard, refer to the Transmission Operator Certification SAR, the Functional Model, and its Technical Discussion Document. These documents were used in the drafting of the standard and can be accessed at the following links:

[ftp://www.nerc.com/pub/sys/all\\_updl/standards/sar/TOP\\_CERTIFICATION\\_01\\_03.pdf](ftp://www.nerc.com/pub/sys/all_updl/standards/sar/TOP_CERTIFICATION_01_03.pdf)  
<http://www.nerc.com/~filez/functionalmode.html>

Changes were made in the drafting of the standard to reflect the revisions made to the Functional Model since the drafting of the SAR.

The Certification Standard Drafting Team would like to receive industry comments on this group of standards. Accordingly, we request your comments included on this form, emailed to [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the subject “Transmission Operator Certification Standards Comments” by **October 15, 2005**.

**Standard – ORG-001-1 – Transmission Operator Certification – Certification**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard. In addition, the Drafting Team removed the requirement of a site-visit because it was redundant with the elements of the administrative process. The removal of this requirement does not eliminate the need for a site visit from the process, but merely places the elements in the certification administrative process.

1. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Certification standard? If not, please explain in the comment area.

Yes

No

Comments: Requirement R3 references a "NERC Certification Process for transmission operators", However we are unaware of the existence of such a process. The IESO suggests that it accompany this standard as part of the TOP implementation plan.

**Standard – ORG-002-1 – Transmission Operator Certification – Agreements**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting Team has made modification to provide clarification to the standard. In addition, the Drafting Team has removed the requirement for the TOP to sign the NERC Confidentiality Agreement. It was identified during the comment period that some TOPs can perform their responsibilities without having access to this ISN data. If this can be accomplished, there is no justification for this requirement. The removal of this requirement from the standard does not eliminate the need to sign the confidentiality agreement if the entity requires access to the ISN data.

2. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Agreements standard? If not, please explain in the comment area.

Yes

No

Comments: For each element in Requirements 1.1 to 1.7, we suggest replacing the word "commitment" with "obligation". It is the IESO's view the term "obligation" is a more compelling word.

**Standard – ORG-003-1 – Transmission Operator Certification – Personnel**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

3. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Personnel standard? If not, please explain in the comment area.

Yes

No

Comments: R2.1 (training program) is too general and subjective. This Requirement requires more specificity.

**Standard – ORG-004-1 – Transmission Operator Certification – Data Acquisition and Monitoring**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

4. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Data Acquisition and Monitoring standard? If not, please explain in the comment area.

Yes

No

Comments: (i)- Requirement 1 - "periodicity of transmittal" and "time frame" appear to mean the same thing.

(ii)- In order to be consistent with the content and intent of this certification standard, the wording in the Purpose section need to be modified to include more than real-time data (e.g. generator maintenance plan, transmission maintenance plan, etc).

(iii)- The sub-requirements of R2 should include "synchronizing facilities"

**Standard – ORG-007-1 – Transmission Operator Certification – Loss of Control Center Functionality**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

5. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Loss of Control Center Functionality standard? If not, please explain in the comment area.

Yes

No

Comments: Requirement R1 - outlines that TOP shall have procedures, processes, tools or facilities to continue to operate its RC Area under "single occurrence" for each of conditions listed. This needs to be clarified and revised to state that RC's shall continue to operate for any combination of conditions rather than single occurrence alone.

In addition R1, Bullet 5 is too general and should be specific with respect to building support functions.. Suggest "Loss of control center building functions, e.g., HVAC, power, water, etc."

6. During the 2<sup>nd</sup> posting of the TOP Certification Standards, industry consensus was obtained for the Introduction, Requirements, Measures, and Compliance elements of:

**ORG-005 - Transmission Operator Certification — System Analysis**

**ORG-006 - Transmission Operator Certification — Emergency Operations**

**ORG-008 - Transmission Operator Certification — Restoration.**

The Drafting Team is not asking any specific questions related to these standards, but is providing an opportunity for comments related to them.

Comments: a). With regards to Emergency Operations, please see the comments below:

(i)- The entity seeking certification must have the capability to continue operations during emergency conditions. The entity must have communication protocols in place to allow other transmission entities to communicate vital information via more than one communication media. This needs to be clearly reflected/updated in the standard.

(ii)- re: R1: It needs to be indicated that TOP's processes and directing the actions are applicable to Generator Operators(s), Transmission Owner(s), Load Serving entities and Distribution Provider(s). It should be consistent with ORG-002 (TOP Certification- Agreements).

(iii)- ORG-006, change A3 from Transmission Operators to Transmission Operator

b). With regards to the "Restoration" Standard, there may be a need to included a minimum list of items that need to be included in the TOP restoration plan.

7. Please identify any elements that should be included in the standards that have not been identified?

Comments: (i)- The IESO has a general concern with regard to the existing NERC Registration Process and the ultimate TOP Certification Process. The concern regards the consistency, or lack thereof, of TOP registrations already performed, and the various interpretations within the industry of what constitutes a TOP. The IESO believes that guidelines must be established that provide consistency in registration and ultimately certification. Our understanding is that these issues continue to be under consideration at the Functional Model Working Group and we would ask that these guidelines be developed and included in the revised Functional Model or be included in the implementation plan for the TOP Certification Standard.

(ii)- With regards to the definition of the Agreement, we recommend that following wording should be used for the proposed statement/definition of Agreement, i.e. "For purposes of applying the term 'Agreement' within this standard it shall mean:

a contract or other document delineating an arrangement that expresses assent and or obligation by two or more parties to the same object. This arrangement determines a course of action to be followed by all parties involved in the situation. The key components of the agreement must identify the ability, intent, and authority of the parties. The requirement for an agreement can be satisfied in

## Comment Form – Transmission Operator Certification Standards, Draft 3

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a variety of ways, including but not limited to: contracts, designation of authority documents, market rules, policies, and procedures.

(iii)- It is expected that audits will be conducted for these standards. In that case, we suggest that a retention period for any audit records and results be specified.

8. Please identify any regional differences that should be included in the standards? (Please identify the standard, the requirement, and specific difference that needs to be included in the requirement)

Comments:

9. Do you agree with the proposed implementation plan? If not, please explain in the comment area.

Yes

No

Comments: The implementation and application of this standard in terms of coordination with other Functional Model related entities should need to allow for a transition period until the other FM related entities are either fully registered or certified. Moreover, these entities (such as GOP, DP, etc.) need to be clearly defined and registered/certified before the implementation of this certification standard.

10. The Drafting Team believes that the TOP Certification standards are ready for ballot. Do you support this position? If not, please explain in the comment area.

Yes

No

Comments: Once our above comments are incorporated then we would consider these ready for balloting.

**Comment Form – Transmission Operator Certification Standards, Draft 3**

---

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Roger Champagne	
Organization:	Hydro-Québec TransÉnergie	
Telephone:	514-289-2211; ext. 2766	
Email:	champagne.roger.2@hydro.qc.ca	
NERC Region	Registered Ballot Body Segment	
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities
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**Background Information:**

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Changes were made in the drafting of the standard to reflect the revisions made to the Functional Model since the drafting of the SAR.

The Certification Standard Drafting Team would like to receive industry comments on this group of standards. Accordingly, we request your comments included on this form, emailed to [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the subject “Transmission Operator Certification Standards Comments” by **October 15, 2005**.

**Standard – ORG-001-1 – Transmission Operator Certification – Certification**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard. In addition, the Drafting Team removed the requirement of a site-visit because it was redundant with the elements of the administrative process. The removal of this requirement does not eliminate the need for a site visit from the process, but merely places the elements in the certification administrative process.

1. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Certification standard? If not, please explain in the comment area.

Yes

No

Comments: R3 implies a single TOP for each Control Area. NERC guidance allows multiple TOPs to register with a single Control Area. The Version 0 Matrix of Requirements by Function identifies tasks are not necessarily under the purview of a single entity. We request clarification from the Drafting Team on which is appropriate. In many cases there is no delegation of responsibilities in performing certain task but rather agreements that detail which entity performs any given task.

We would suggest a statement such as the following be added to the document:

"Agreements between any entities performing Transmission Operating tasks referenced in R-1 of ORG-002-1 shall not be superceded by those in R-3 in ORG-001-1. The entities signing such agreements must take steps to ensure that all requirements stated in the standards are performed by at least one entity, i.e. there are no gaps in responsibilities."

**Standard – ORG-002-1 – Transmission Operator Certification – Agreements**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting Team has made modification to provide clarification to the standard. In addition, the Drafting Team has removed the requirement for the TOP to sign the NERC Confidentiality Agreement. It was identified during the comment period that some TOPs can perform their responsibilities without having access to this ISN data. If this can be accomplished, there is no justification for this requirement. The removal of this requirement from the standard does not eliminate the need to sign the confidentiality agreement if the entity requires access to the ISN data.

2. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Agreements standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-003-1 – Transmission Operator Certification – Personnel**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

3. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Personnel standard? If not, please explain in the comment area.

Yes

No

Comments: We recommend that the word "operate" be removed from the first bullet in R1.1 to demonstrate that field personnel who may physically operate equipment do not necessarily require this certification.

R2.1 (training program) is extremely general and completely subjective. This Requirement needs more specificity.

**Standard – ORG-004-1 – Transmission Operator Certification – Data Acquisition and Monitoring**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

4. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Data Acquisition and Monitoring standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-007-1 – Transmission Operator Certification – Loss of Control Center Functionality**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

5. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Loss of Control Center Functionality standard? If not, please explain in the comment area.

Yes

No

Comments: R1, Bullet 5: This is too general. We suggest changing to "Loss of control center building functions, i.e. HVAC, power, water, etc."

6. During the 2<sup>nd</sup> posting of the TOP Certification Standards, industry consensus was obtained for the Introduction, Requirements, Measures, and Compliance elements of:

**ORG-005 - Transmission Operator Certification — System Analysis**

**ORG-006 - Transmission Operator Certification — Emergency Operations**

**ORG-008 - Transmission Operator Certification — Restoration.**

The Drafting Team is not asking any specific questions related to these standards, but is providing an opportunity for comments related to them.

Comments: ORG-006, change A3 from Transmission Operators to Transmission Operator

7. Please identify any elements that should be included in the standards that have not been identified?

Comments: See Question 1 Response above.

8. Please identify any regional differences that should be included in the standards? (Please identify the standard, the requirement, and specific difference that needs to be included in the requirement)

Comments:

9. Do you agree with the proposed implementation plan? If not, please explain in the comment area.

Yes

No

Comments:

10. The Drafting Team believes that the TOP Certification standards are ready for ballot. Do you support this position? If not, please explain in the comment area.

Yes

No

Comments: If the above comments are satisfied, then these standards are ready for ballot.

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<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	Scott N. Peterson
Organization:	San Diego Gas & Electric
Telephone:	(619) 725-8639
Email:	speterson@semprautilities.com
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
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<input type="checkbox"/> SPP	<input type="checkbox"/> 9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	
<input type="checkbox"/> NA - Not Applicable	

Group Comments (Complete this page if comments are from a group.)			
<b>Group Name:</b>			
<b>Lead Contact:</b>			
<b>Contact Organization:</b>			
<b>Contact Segment:</b>			
<b>Contact Telephone:</b>			
<b>Contact Email:</b>			

Additional Member Name	Additional Member Organization	Region*	Segment*

\*If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

**Background Information:**

To understand the Standard Drafting Team’s philosophy used to create the standard, refer to the Transmission Operator Certification SAR, the Functional Model, and its Technical Discussion Document. These documents were used in the drafting of the standard and can be accessed at the following links:

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Changes were made in the drafting of the standard to reflect the revisions made to the Functional Model since the drafting of the SAR.

The Certification Standard Drafting Team would like to receive industry comments on this group of standards. Accordingly, we request your comments included on this form, emailed to [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the subject “Transmission Operator Certification Standards Comments” by **October 15, 2005**.

**Standard – ORG-001-1 – Transmission Operator Certification – Certification**

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1. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Certification standard? If not, please explain in the comment area.

Yes

No

Comments: In California, the CAISO and member regulated utilities have both registered as TOPs for the same equipment. Most of the TOP functions are performed by the CAISO, but a number of tasks have either been retained by the member utilities or have been delegated from the CAISO to those utilities. How do the standards deal with this situation? The member utilities do not believe they are responsible for those tasks not delegated to them by the CAISO even though they have registered as a TOP.

**Standard – ORG-002-1 – Transmission Operator Certification – Agreements**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting Team has made modification to provide clarification to the standard. In addition, the Drafting Team has removed the requirement for the TOP to sign the NERC Confidentiality Agreement. It was identified during the comment period that some TOPs can perform their responsibilities without having access to this ISN data. If this can be accomplished, there is no justification for this requirement. The removal of this requirement from the standard does not eliminate the need to sign the confidentiality agreement if the entity requires access to the ISN data.

2. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Agreements standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-003-1 – Transmission Operator Certification – Personnel**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

3. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Personnel standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-004-1 – Transmission Operator Certification – Data Acquisition and Monitoring**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

4. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Data Acquisition and Monitoring standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-007-1 – Transmission Operator Certification – Loss of Control Center Functionality**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

5. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Loss of Control Center Functionality standard? If not, please explain in the comment area.

Yes

No

Comments:

6. During the 2<sup>nd</sup> posting of the TOP Certification Standards, industry consensus was obtained for the Introduction, Requirements, Measures, and Compliance elements of:

**ORG-005 - Transmission Operator Certification — System Analysis**

**ORG-006 - Transmission Operator Certification — Emergency Operations**

**ORG-008 - Transmission Operator Certification — Restoration.**

The Drafting Team is not asking any specific questions related to these standards, but is providing an opportunity for comments related to them.

Comments: Under System Analysis, member utilities under CAISO control area have also registered as TOP along with the CAISO. In these cases, these member report system analysis directly to CAISO rather than RC.

7. Please identify any elements that should be included in the standards that have not been identified?

Comments:

8. Please identify any regional differences that should be included in the standards? (Please identify the standard, the requirement, and specific difference that needs to be included in the requirement)

Comments:

9. Do you agree with the proposed implementation plan? If not, please explain in the comment area.

Yes

No

Comments: In all sub sections the proposed effective date of April 1, 2006 should be extend to October 1, 2006 to allow for Agreements, documentation, and training records to be completed.

10. The Drafting Team believes that the TOP Certification standards are ready for ballot. Do you support this position? If not, please explain in the comment area.

Yes

No

Comments: See above comments.

**Comment Form – Transmission Operator Certification Standards, Draft 3**

---

This form is to be used to submit comments on the proposed Draft 3 of the Transmission Operator Certification Standards. Comments must be submitted by **October 15, 2005**. You may submit the completed form by emailing it to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the words “Transmission Operator Certification Standards Comments” in the subject line. If you have questions please contact Mark Ladrow at [mark.ladrow@nerc.net](mailto:mark.ladrow@nerc.net) or by telephone at 609-452-8060.

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  - Do use punctuation and capitalization as needed (except quotations).
  - Do use more than one form if responses do not fit in the spaces provided.
  - Do submit any formatted text or markups in a separate WORD file.

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  - Do not submit a response in an unprotected copy of this form.

<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	
Organization:	
Telephone:	
Email:	
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/> 3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/> 4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/> 5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/> 6 - Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input type="checkbox"/> 7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/> 8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/> 9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	
<input type="checkbox"/> NA - Not Applicable	

**Comment Form – Transmission Operator Certification Standards, Draft 3**

Group Comments (Complete this page if comments are from a group.)

**Group Name:** FRCC  
**Lead Contact:** Eric Senkowicz  
**Contact Organization:** FRCC  
**Contact Segment:** 2  
**Contact Telephone:** 813-289-5644  
**Contact Email:** esenkowicz@frcc.com

<b>Additional Member Name</b>	<b>Additional Member Organization</b>	<b>Region*</b>	<b>Segment*</b>
Linda Campbell	FRCC	FRCC	2
Alan Gale	City of Tallahassee	FRCC	5
Steve Wallace	Seminole Electric Cooperative	FRCC	4
Ron Donahey	Tampa Electric Company	FRCC	1
Bob Remley	Clay Electric Cooperative	FRCC	3
Mark Bennett	Gainesville Regional Utilities	FRCC	5
Bill Rouse	Orlando Utilities Commission	FRCC	1

\*If more than one Region or Segment applies, indicate the best fit for the purpose of these comments.  
Regional acronyms and segment numbers are shown on prior page.

**Background Information:**

To understand the Standard Drafting Team’s philosophy used to create the standard, refer to the Transmission Operator Certification SAR, the Functional Model, and its Technical Discussion Document. These documents were used in the drafting of the standard and can be accessed at the following links:

[ftp://www.nerc.com/pub/sys/all\\_updl/standards/sar/TOP\\_CERTIFICATION\\_01\\_03.pdf](ftp://www.nerc.com/pub/sys/all_updl/standards/sar/TOP_CERTIFICATION_01_03.pdf)  
<http://www.nerc.com/~filez/functionalmode.html>

Changes were made in the drafting of the standard to reflect the revisions made to the Functional Model since the drafting of the SAR.

The Certification Standard Drafting Team would like to receive industry comments on this group of standards. Accordingly, we request your comments included on this form, emailed to [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the subject “Transmission Operator Certification Standards Comments” by **October 15, 2005**.

**Standard – ORG-001-1 – Transmission Operator Certification – Certification**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard. In addition, the Drafting Team removed the requirement of a site-visit because it was redundant with the elements of the administrative process. The removal of this requirement does not eliminate the need for a site visit from the process, but merely places the elements in the certification administrative process.

1. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Certification standard? If not, please explain in the comment area.

Yes

No

Comments: As these standards have been refined, the FRCC has had increasing concerns with the redundancy of Reliability Standards Requirements in multiple standards. Duplication of Requirements and "one-time" certification Measures will lead to confusion, dilute recognition of Requirements, weaken the standards process and potentially introduce synchronization issues between the Requirements across the different standards in which they occur.

In an effort to clarify the overall standards process, reduce documentation and focus the compliance process the FRCC suggests to replace these eight standards with a single certification standard which addresses the certification process only, as defined in the Standard Authorization Request (SAR) which initiated these standards. This single standard would only include the unique requirements of the certification process (as described in the SAR) and would address the specific Transmission Operator process requirements by global or specific reference. This would eliminate redundancy, eliminate the need for additional synchronization controls and maintain the integrity of the current TOP applicable Requirements. This would also help focus the compliance elements rather than weaken and dilute them.

There is a Requirements database which currently exists, that sorts applicable requirements applicable to each entity. The end product of a single certification process only standard, would be that TOPs going through the certification process would come out of it with a focused and clearer understanding of the actual Reliability Standards and associated Requirements for which they will be required to comply with on a day-to-day basis.

**Standard – ORG-002-1 – Transmission Operator Certification – Agreements**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting Team has made modification to provide clarification to the standard. In addition, the Drafting Team has removed the requirement for the TOP to sign the NERC Confidentiality Agreement. It was identified during the comment period that some TOPs can perform their responsibilities without having access to this ISN data. If this can be accomplished, there is no justification for this requirement. The removal of this requirement from the standard does not eliminate the need to sign the confidentiality agreement if the entity requires access to the ISN data.

2. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Agreements standard? If not, please explain in the comment area.

Yes

No

Comments: See comment to number 1.

**Standard – ORG-003-1 – Transmission Operator Certification – Personnel**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

3. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Personnel standard? If not, please explain in the comment area.

Yes

No

Comments: See comment to number 1.

**Standard – ORG-004-1 – Transmission Operator Certification – Data Acquisition and Monitoring**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

4. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Data Acquisition and Monitoring standard? If not, please explain in the comment area.

Yes

No

Comments: See comment to number 1.

**Standard – ORG-007-1 – Transmission Operator Certification – Loss of Control Center Functionality**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

5. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Loss of Control Center Functionality standard? If not, please explain in the comment area.

Yes

No

Comments: See comment to number 1.

## Comment Form – Transmission Operator Certification Standards, Draft 3

---

6. During the 2<sup>nd</sup> posting of the TOP Certification Standards, industry consensus was obtained for the Introduction, Requirements, Measures, and Compliance elements of:

**ORG-005 - Transmission Operator Certification — System Analysis**

**ORG-006 - Transmission Operator Certification — Emergency Operations**

**ORG-008 - Transmission Operator Certification — Restoration.**

The Drafting Team is not asking any specific questions related to these standards, but is providing an opportunity for comments related to them.

Comments: See comment to number 1.

7. Please identify any elements that should be included in the standards that have not been identified?

Comments:

8. Please identify any regional differences that should be included in the standards? (Please identify the standard, the requirement, and specific difference that needs to be included in the requirement)

Comments:

9. Do you agree with the proposed implementation plan? If not, please explain in the comment area.

Yes

No

Comments: See comment to number 1.

10. The Drafting Team believes that the TOP Certification standards are ready for ballot. Do you support this position? If not, please explain in the comment area.

Yes

No

Comments: See comment to number 1.

**Comment Form – Transmission Operator Certification Standards, Draft 3**

---

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  - Do not submit a response in an unprotected copy of this form.

<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	Carter B. Edge
Organization:	Southeastern Power Administration
Telephone:	706-213-3863
Email:	cartere@sepa.doe.gov
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/> 3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input checked="" type="checkbox"/> 4 - Transmission-dependent Utilities
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<input type="checkbox"/> SPP	<input type="checkbox"/> 9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	
<input type="checkbox"/> NA - Not Applicable	



**Background Information:**

To understand the Standard Drafting Team’s philosophy used to create the standard, refer to the Transmission Operator Certification SAR, the Functional Model, and its Technical Discussion Document. These documents were used in the drafting of the standard and can be accessed at the following links:

[ftp://www.nerc.com/pub/sys/all\\_updl/standards/sar/TOP\\_CERTIFICATION\\_01\\_03.pdf](ftp://www.nerc.com/pub/sys/all_updl/standards/sar/TOP_CERTIFICATION_01_03.pdf)  
<http://www.nerc.com/~filez/functionalmode.html>

Changes were made in the drafting of the standard to reflect the revisions made to the Functional Model since the drafting of the SAR.

The Certification Standard Drafting Team would like to receive industry comments on this group of standards. Accordingly, we request your comments included on this form, emailed to [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the subject “Transmission Operator Certification Standards Comments” by **October 15, 2005**.

**Standard – ORG-001-1 – Transmission Operator Certification – Certification**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard. In addition, the Drafting Team removed the requirement of a site-visit because it was redundant with the elements of the administrative process. The removal of this requirement does not eliminate the need for a site visit from the process, but merely places the elements in the certification administrative process.

1. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Certification standard? If not, please explain in the comment area.

Yes

No

Comments: As these standards have been refined, SEPA has had increasing concerns with the redundancy of Reliability Standards Requirements in multiple standards. Duplication of Requirements and "one-time" certification Measures will lead to confusion, dilute recognition of Requirements, weaken the standards process and potentially introduce synchronization issues between the Requirements across the different standards in which they occur.

The specific standards referenced in ORG-001-1, R1 are :

- Transmission Operator Certification — Certification (ORG-001-1)
- Transmission Operator Certification — Agreements (ORG-002-1)
- Transmission Operator Certification — Personnel (ORG-003-1)
- Transmission Operator Certification — Data Acquisition and Monitoring (ORG-004-1)
- Transmission Operator Certification — System Analysis (ORG-005-1)
- Transmission Operator Certification — Emergency Operations (ORG-006-1)
- Transmission Operator Certification — Loss of Control Center Functionality (ORG-007-1)
- Transmission Operator Certification — Restoration (ORG-008-1)

ORG-001-1, R3 – Similar language is found in IRO-001-0, R1 for the Reliability Coordinator, but not in any of the TOP standards for the Transmission Operator. We probably need to be consistent for all entities and put it in one set of standards or the other (Organizational Certification Standards or Reliability Standards), but not both. Since this is something that can be done after initial certification, it should probably be in the Reliability Standards and referenced by the Organizational Certification Standards.

ORG-001-1, R4 – This is a reference to the NERC Reliability Standards generically. If they can be referenced generically, why can they not be referenced specifically?

ORG-001-1, R5 – Seems redundant. Why do you need a requirement saying that certification will be conditional on another (single) requirement?

**Standard – ORG-002-1 – Transmission Operator Certification – Agreements**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting Team has made modification to provide clarification to the standard. In addition, the Drafting Team has removed the requirement for the TOP to sign the NERC Confidentiality Agreement. It was identified during the comment period that some TOPs can perform their responsibilities without having access to this ISN data. If this can be accomplished, there is no justification for this requirement. The removal of this requirement from the standard does not eliminate the need to sign the confidentiality agreement if the entity requires access to the ISN data.

2. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Agreements standard? If not, please explain in the comment area.

Yes

No

Comments: ORG-002-1, R1 – The agreements listed in this requirement are neither complete nor definitive nor can they be. We highly suggest that they be modified to reference agreements required to meet the functional requirements of the appropriate NERC Reliability Standards. In addition, some, if not most, of the entities referred to by this requirement are not well defined in the existing Functional Model. Nor has there been any effort to register these entities in the regions. It would seem more useful to require agreements with functional requirements with the proper entities rather than depend upon Functional Model entities that have not been defined or that do not yet exist.

**Standard – ORG-003-1 – Transmission Operator Certification – Personnel**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

3. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Personnel standard? If not, please explain in the comment area.

Yes

No

Comments: ORG-003-1, R1.1 – This requirements goes into specific detail well beyond that of the currently approved NERC Reliability Standard PER-003-0, which requires certified personnel in R1.1 for -Positions that have the primary responsibility, either directly or through communications with others, for the real-time operation of the interconnected Bulk Electric System- and in R1.2. - Positions directly responsible for complying with NERC standards-. In our opinion, it is inappropriate to -make up- new personnel certification requirement details in Organizational Certification Standards that are not supported in the appropriate NERC Reliability Standard.

ORG-003-1, R2 – This requirement does not appear to support the specific training requirements of NERC Reliability Standard PER-002-0 and is therefore inadequate as the sole training requirement for organizational certification.

**Standard – ORG-004-1 – Transmission Operator Certification – Data Acquisition and Monitoring**

## Comment Form – Transmission Operator Certification Standards, Draft 3

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Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

4. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Data Acquisition and Monitoring standard? If not, please explain in the comment area.

Yes

No

Comments: ORG-004-1, R1, R2 and R4 – The specific details within these requirements are neither complete nor definitive nor can they be. We highly suggest that they be modified to reference the functional requirements of the appropriate NERC Reliability Standards for data acquisition periodicity and accuracy (see, for example BAL-005-0, R8, R16 and R17).

### **Standard – ORG-007-1 – Transmission Operator Certification – Loss of Control Center Functionality**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

5. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Loss of Control Center Functionality standard? If not, please explain in the comment area.

Yes

No

Comments:

6. During the 2<sup>nd</sup> posting of the TOP Certification Standards, industry consensus was obtained for the Introduction, Requirements, Measures, and Compliance elements of:

**ORG-005 - Transmission Operator Certification — System Analysis**

**ORG-006 - Transmission Operator Certification — Emergency Operations**

**ORG-008 - Transmission Operator Certification — Restoration.**

The Drafting Team is not asking any specific questions related to these standards, but is providing an opportunity for comments related to them.

Comments: ORG-005-1, R1thru R5 – The specific details within these requirements are neither complete nor definitive nor can they be. We highly suggest that they be modified to reference the functional requirements of the appropriate NERC Reliability Standards for transmission operations (TOP-001-0 thru TOP-008-0) and Reliability Coordinator interaction (IRO-001-0 thru IRO-006-0)  
ORG-006-1, R1– The specific details within these requirements are neither complete nor definitive nor can they be. I highly suggest that they be modified to reference the functional requirements of

## Comment Form – Transmission Operator Certification Standards, Draft 3

---

the appropriate NERC Reliability Standards for Emergency Operations (EOP-001-0 thru EOP-008-0).

7. Please identify any elements that should be included in the standards that have not been identified?

Comments:

8. Please identify any regional differences that should be included in the standards? (Please identify the standard, the requirement, and specific difference that needs to be included in the requirement)

Comments:

9. Do you agree with the proposed implementation plan? If not, please explain in the comment area.

Yes

No

Comments:

10. The Drafting Team believes that the TOP Certification standards are ready for ballot. Do you support this position? If not, please explain in the comment area.

Yes

No

Comments: It should be pointed out during the V-0 standard development process and in the subsequent Version 1 standards development process, and on many other drafting teams, the drafting teams were instructed not to place duplicated requirements in two different standards. The appropriate procedure was to include the requirement in one standard and reference it in the other standard to prevent mistakenly updating it in one standard but not in the other as changes are required.

We understand that the Certification drafting team has received different guidance which does not allow -referencing- of other standards. We feel this is a mistake and will cause potential problems with the standards themselves, and possibly jeopardizing reliability. We request that the drafting team provide the specific reference or source of the directives which forbids referencing the NERC Reliability Standards from within the Organizational Certification Standards. We believe that directive to be incorrect. This -no reference- directive appears to be particularly inappropriate for

Organizational Certification Standards, which appear to be fundamentally different from other NERC Reliability Standards.

**Comment Form – Transmission Operator Certification Standards, Draft 3**

---

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
Email:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/>	5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers
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<input type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	<input type="checkbox"/>	
<input type="checkbox"/> NA - Not Applicable	<input type="checkbox"/>	

**Comment Form – Transmission Operator Certification Standards, Draft 3**

---

Group Comments (Complete this page if comments are from a group.)

**Group Name:** Operating Reliability Working Group (ORWG)

**Lead Contact:** Robert Rhodes, Secretary

**Contact Organization:** Southwest Power Pool

**Contact Segment:** 2

**Contact Telephone:** 501-614-3241

**Contact Email:** rrhodes@spp.org

Additional Member Name	Additional Member Organization	Region*	Segment*
Mike Anderson	AEP	SPP	1
Bob Cochran	SPS	SPP	1
Mike Gammon	KCP&L	SPP	1
Don Hargrove	OG&E	SPP	1
Allen Klassen	Westar	SPP	1
Pete Kuebeck	OG&E	SPP	1
Bill Nolte	SECI	SPP	1
Robert Rhodes	SPP	SPP	2

\*If more than one Region or Segment applies, indicate the best fit for the purpose of these comments.  
Regional acronyms and segment numbers are shown on prior page.

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To understand the Standard Drafting Team's philosophy used to create the standard, refer to the Transmission Operator Certification SAR, the Functional Model, and its Technical Discussion Document. These documents were used in the drafting of the standard and can be accessed at the following links:

[ftp://www.nerc.com/pub/sys/all\\_updl/standards/sar/TOP\\_CERTIFICATION\\_01\\_03.pdf](ftp://www.nerc.com/pub/sys/all_updl/standards/sar/TOP_CERTIFICATION_01_03.pdf)  
<http://www.nerc.com/~filez/functionalmode.html>

Changes were made in the drafting of the standard to reflect the revisions made to the Functional Model since the drafting of the SAR.

The Certification Standard Drafting Team would like to receive industry comments on this group of standards. Accordingly, we request your comments included on this form, emailed to [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the subject "Transmission Operator Certification Standards Comments" by **October 15, 2005**.

**Standard – ORG-001-1 – Transmission Operator Certification – Certification**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard. In addition, the Drafting Team removed the requirement of a site-visit because it was redundant with the elements of the administrative process. The removal of this requirement does not eliminate the need for a site visit from the process, but merely places the elements in the certification administrative process.

1. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Certification standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-002-1 – Transmission Operator Certification – Agreements**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting Team has made modification to provide clarification to the standard. In addition, the Drafting Team has removed the requirement for the TOP to sign the NERC Confidentiality Agreement. It was identified during the comment period that some TOPs can perform their responsibilities without having access to this ISN data. If this can be accomplished, there is no justification for this requirement. The removal of this requirement from the standard does not eliminate the need to sign the confidentiality agreement if the entity requires access to the ISN data.

2. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Agreements standard? If not, please explain in the comment area.

Yes

No

Comments: In our comments filed on the second draft of this proposed standard we mentioned concerns we had about the apparent conflict in R1.1.6.1 with the FERC Code of Conduct. In its reply to our comments, the SDT indicated that the requirement was not intended to cause the TOP to violate the Code of Conduct and that the standard has been modified per our suggestion. However, this draft of the standard contains the exact same language as the second draft. This issue still needs to be resolved. We would again suggest including language which would add "such as allowed under the FERC Code of Conduct" to the requirement.

**Standard – ORG-003-1 – Transmission Operator Certification – Personnel**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

3. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Personnel standard? If not, please explain in the comment area.

Yes

No

Comments: The third bullet under R1.1 contains a similar requirement as that mentioned in ORG-002-1, R1.1.6.1 and commented on in Question 2 above.

**Standard – ORG-004-1 – Transmission Operator Certification – Data Acquisition and Monitoring**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

4. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Data Acquisition and Monitoring standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-007-1 – Transmission Operator Certification – Loss of Control Center Functionality**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

5. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Loss of Control Center Functionality standard? If not, please explain in the comment area.

Yes

No

Comments: Although the SDT made an effort to clarify that loss of only primary systems is the intent in R1, the footnotes are still not totally clear that this is the case. For example, Footnote 1 could be reworded to say "Loss of communications is meant to include only primary communications..."

6. During the 2<sup>nd</sup> posting of the TOP Certification Standards, industry consensus was obtained for the Introduction, Requirements, Measures, and Compliance elements of:

**ORG-005 - Transmission Operator Certification — System Analysis**

**ORG-006 - Transmission Operator Certification — Emergency Operations**

**ORG-008 - Transmission Operator Certification — Restoration.**

The Drafting Team is not asking any specific questions related to these standards, but is providing an opportunity for comments related to them.

Comments: Bulk Electric System (BES) is used in ORG-006 and ORG-008 but is not capitalized even though it is a defined term in the Standards Glossary.

7. Please identify any elements that should be included in the standards that have not been identified?

Comments:

8. Please identify any regional differences that should be included in the standards? (Please identify the standard, the requirement, and specific difference that needs to be included in the requirement)

Comments:

9. Do you agree with the proposed implementation plan? If not, please explain in the comment area.

Yes

No

Comments:

10. The Drafting Team believes that the TOP Certification standards are ready for ballot. Do you support this position? If not, please explain in the comment area.

Yes

No

Comments: We could support submitting the standard for ballot provided the issue in ORG-002-1, R1.1.6.1 (Question 2) and ORG-003-1, R1.1 (Question 3) and the additional clarification requested on ORG-007-1, R1 (Question 5) are adequately addressed.

**Comment Form – Transmission Operator Certification Standards, Draft 3**

---

This form is to be used to submit comments on the proposed Draft 3 of the Transmission Operator Certification Standards. Comments must be submitted by **October 15, 2005**. You may submit the completed form by emailing it to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the words “Transmission Operator Certification Standards Comments” in the subject line. If you have questions please contact Mark Ladrow at [mark.ladrow@nerc.net](mailto:mark.ladrow@nerc.net) or by telephone at 609-452-8060.

**ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE AND IT IS THEREFORE IMPORTANT TO ADHERE TO THE FOLLOWING REQUIREMENTS:**

- DO:**
- Do enter text only, with no formatting or styles added.
  - Do use punctuation and capitalization as needed (except quotations).
  - Do use more than one form if responses do not fit in the spaces provided.
  - Do submit any formatted text or markups in a separate WORD file.

- DO NOT:**
- Do not insert tabs or paragraph returns in any data field.
  - Do not use numbering or bullets in any data field.
  - Do not use quotation marks in any data field.
  - Do not submit a response in an unprotected copy of this form.

<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
Email:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/>	5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users
<input checked="" type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	<input type="checkbox"/>	
<input type="checkbox"/> NA - Not Applicable		

**Comment Form – Transmission Operator Certification Standards, Draft 3**

---

Group Comments (Complete this page if comments are from a group.)

**Group Name:** Southern Company - Transmission

**Lead Contact:** Marc M. Butts

**Contact Organization:** Southern Company Services

**Contact Segment:** 1

**Contact Telephone:** 205-257-4839

**Contact Email:** mmbutts@southernco.com

<b>Additional Member Name</b>	<b>Additional Member Organization</b>	<b>Region*</b>	<b>Segment*</b>
Raymond Vice	Southern Company Services	SERC	1
Doug McLaughlin	Southern Company Services	SERC	1
Mike Oatts	Southern Company Services	SERC	1
Keith Calhoun	Southern Company Services	SERC	1
Jim Viikinsalo	Southern Company Services	SERC	1
Jim Griffith	Southern Company Services	SERC	1
Jim Busbin	Southern Company Services	SERC	1
Wade Pugh	Southern Company Services	SERC	1
Phil Winston	Georgia Power Company	SERC	3

\*If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

**Background Information:**

To understand the Standard Drafting Team’s philosophy used to create the standard, refer to the Transmission Operator Certification SAR, the Functional Model, and its Technical Discussion Document. These documents were used in the drafting of the standard and can be accessed at the following links:

[ftp://www.nerc.com/pub/sys/all\\_updl/standards/sar/TOP\\_CERTIFICATION\\_01\\_03.pdf](ftp://www.nerc.com/pub/sys/all_updl/standards/sar/TOP_CERTIFICATION_01_03.pdf)  
<http://www.nerc.com/~filez/functionalmode.html>

Changes were made in the drafting of the standard to reflect the revisions made to the Functional Model since the drafting of the SAR.

The Certification Standard Drafting Team would like to receive industry comments on this group of standards. Accordingly, we request your comments included on this form, emailed to [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the subject “Transmission Operator Certification Standards Comments” by **October 15, 2005**.

**Standard – ORG-001-1 – Transmission Operator Certification – Certification**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard. In addition, the Drafting Team removed the requirement of a site-visit because it was redundant with the elements of the administrative process. The removal of this requirement does not eliminate the need for a site visit from the process, but merely places the elements in the certification administrative process.

1. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Certification standard? If not, please explain in the comment area.

Yes

No

Comments: ORG-001-1, R1 – Southern Company - Transmission previously commented that the certification standards should -...reference the various standards (approved NERC Reliability Standards) that truly apply and not list each specific task that is required. Having a list may lead to the standards being changed at different times and the two getting out of synch with each other.- The Standard Drafting Team replied that -The Reliability Standards process is to avoid referencing standards within another standard to prevent discrepancies between the intended standard elements and future changes that may be made to the referenced standard.- We can not find the source of this directive and request that the drafting team provide the specific reference which forbids referencing the NERC Reliability St from within the Organizational Certification Standards. However, even if this is appropriate for NERC Reliability Standards in general, it does not appear to be appropriate for Organizational Certification Standards which appear to be fundamentally different from other NERC Reliability Standards. We request that the Standard Drafting Team, perhaps with the support of NERC Vice President of Standards, reconsider their position on this issue and make all efforts to avoid developing new reliability standards within the Organizational Certification Standards that potentially conflict with the NERC Reliability Standards.

Note that the Standard Drafting Team violates its own direction concerning referencing other NERC standards from within a standard in ORG-001-1, R1 when it specifically references the other TOP Organizational Certification Standards (ORG-001-1, ORG-002-1, etc., although R1 doesn't list their numbers we have done so below in parentheses for your convenience). How can you reference these standards within ORG-001-1 when you can not reference other NERC Reliability Standards? Per your reply above, you can't and these references should be removed, thus eliminating ORG-001-1, R1 entirely. This is an obvious inconsistency. In addition, no such guidance was issued to the Revision 0 Standards Drafting Team and references to other standards were utilized in that process.

The specific standards referenced in ORG-001-1, R1 are :

- Transmission Operator Certification — Certification (ORG-001-1)
- Transmission Operator Certification — Agreements (ORG-002-1)
- Transmission Operator Certification — Personnel (ORG-003-1)
- Transmission Operator Certification — Data Acquisition and Monitoring (ORG-004-1)
- Transmission Operator Certification — System Analysis (ORG-005-1)
- Transmission Operator Certification — Emergency Operations (ORG-006-1)
- Transmission Operator Certification — Loss of Control Center Functionality (ORG-007-1)
- Transmission Operator Certification — Restoration (ORG-008-1)

ORG-001-1, R3 – Similar language is found in IRO-001-0, R1 for the Reliability Coordinator, but not in any of the TOP standards for the Transmission Operator. We probably need to be consistent for all entities and put it in one set of standards or the other (Organizational Certification Standards or Reliability Standards), but not both. Since this is something that can be done after initial certification, it should probably be in the Reliability Standards and referenced by the Organizational Certification Standards.

ORG-001-1, R4 – This is a reference to the NERC Reliability Standards generically. If they can be referenced generically, why can they not be referenced specifically?

ORG-001-1, R5 – Seems redundant. Why do you need a requirement saying that certification will be conditional on another (single) requirement?

**Standard – ORG-002-1 – Transmission Operator Certification – Agreements**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting Team has made modification to provide clarification to the standard. In addition, the Drafting Team has removed the requirement for the TOP to sign the NERC Confidentiality Agreement. It was identified during the comment period that some TOPs can perform their responsibilities without having access to this ISN data. If this can be accomplished, there is no justification for this requirement. The removal of this requirement from the standard does not eliminate the need to sign the confidentiality agreement if the entity requires access to the ISN data.

2. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Agreements standard? If not, please explain in the comment area.

Yes

No

Comments: ORG-002-1, R1 – The agreements listed in this requirement are neither complete nor definitive nor can they be. We highly suggest that they be modified to reference agreements required to meet the functional requirements of the appropriate NERC Reliability Standards. In addition, some, if not most, of the entities referred to by this requirement are not well defined in the existing Functional Model. Nor has there been any effort to register these entities in the regions. It would seem more useful to require agreements with functional requirements with the proper entities rather than depend upon Functional Model entities that have not been defined or that do not yet exist.

**Standard – ORG-003-1 – Transmission Operator Certification – Personnel**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

3. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Personnel standard? If not, please explain in the comment area.

Yes

No

Comments: ORG-003-1, R1.1 – This requirements goes into specific detail well beyond that of the currently approved NERC Reliability Standard PER-003-0, which requires certified personnel in R1.1 for -Positions that have the primary responsibility, either directly or through communications with others, for the real-time operation of the interconnected Bulk Electric System- and in R1.2. - Positions directly responsible for complying with NERC standards-. In our opinion, it is inappropriate to -make up- new personnel certification requirement details in Organizational Certification Standards that are not supported in the appropriate NERC Reliability Standard.

ORG-003-1, R2 – This requirement does not appear to support the specific training requirements of NERC Reliability Standard PER-002-0 and is therefore inadequate as the sole training requirement for organizational certification.

**Standard – ORG-004-1 – Transmission Operator Certification – Data Acquisition and Monitoring**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

4. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Data Acquisition and Monitoring standard? If not, please explain in the comment area.

Yes

No

Comments: ORG-004-1, R1, R2 and R4 – The specific details within these requirements are neither complete nor definitive nor can they be. We highly suggest that they be modified to reference the functional requirements of the appropriate NERC Reliability Standards for data acquisition periodicity and accuracy (see, for example BAL-005-0, R8, R16 and R17).

**Standard – ORG-007-1 – Transmission Operator Certification – Loss of Control Center Functionality**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

5. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Loss of Control Center Functionality standard? If not, please explain in the comment area.

Yes

No

Comments:

6. During the 2<sup>nd</sup> posting of the TOP Certification Standards, industry consensus was obtained for the Introduction, Requirements, Measures, and Compliance elements of:  
**ORG-005 - Transmission Operator Certification — System Analysis**  
**ORG-006 - Transmission Operator Certification — Emergency Operations**  
**ORG-008 - Transmission Operator Certification — Restoration.**

The Drafting Team is not asking any specific questions related to these standards, but is providing an opportunity for comments related to them.

Comments: ORG-005-1, R1 thru R5 – The specific details within these requirements are neither complete nor definitive nor can they be. We highly suggest that they be modified to reference the functional requirements of the appropriate NERC Reliability Standards for transmission operations (TOP-001-0 thru TOP-008-0) and Reliability Coordinator interaction (IRO-001-0 thru IRO-006-0)  
ORG-006-1, R1– The specific details within these requirements are neither complete nor definitive nor can they be. I highly suggest that they be modified to reference the functional requirements of the appropriate NERC Reliability Standards for Emergency Operations (EOP-001-0 thru EOP-008-0).

7. Please identify any elements that should be included in the standards that have not been identified?

Comments:

8. Please identify any regional differences that should be included in the standards? (Please identify the standard, the requirement, and specific difference that needs to be included in the requirement)

Comments:

9. Do you agree with the proposed implementation plan? If not, please explain in the comment area.

Yes

No

Comments:

10. The Drafting Team believes that the TOP Certification standards are ready for ballot. Do you support this position? If not, please explain in the comment area.

Yes

No

Comments: It should be pointed out during the V-0 standard development process and in the subsequent Version 1 standards development process, and on many other drafting teams, the drafting teams were instructed not to place duplicated requirements in two different standards. The appropriate procedure was to include the requirement in one standard and reference it in the other standard to prevent mistakenly updating it in one standard but not in the other as changes are required.

We understand that the Certification drafting team has received different guidance which does not allow -referencing- of other standards. We feel this is a mistake and will cause potential problems with the standards themselves, and possibly jeopardizing reliability. We request that the drafting team provide the specific reference or source of the directives which forbids referencing the NERC Reliability Standards from within the Organizational Certification Standards. We believe that directive to be incorrect. This -no reference- directive appears to be particularly inappropriate for Organizational Certification Standards, which appear to be fundamentally different from other NERC Reliability Standards.

**Comment Form – Transmission Operator Certification Standards, Draft 3**

---

This form is to be used to submit comments on the proposed Draft 3 of the Transmission Operator Certification Standards. Comments must be submitted by **October 15, 2005**. You may submit the completed form by emailing it to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the words “Transmission Operator Certification Standards Comments” in the subject line. If you have questions please contact Mark Ladrow at [mark.ladrow@nerc.net](mailto:mark.ladrow@nerc.net) or by telephone at 609-452-8060.

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  - Do not use quotation marks in any data field.
  - Do not submit a response in an unprotected copy of this form.

<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Ed Davis	
Organization:	Entergy Services	
Telephone:	504-495-2635	
Email:	edavis@entergy.com	
NERC Region	Registered Ballot Body Segment	
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 - Transmission-dependent Utilities
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<input type="checkbox"/> MAPP	<input type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users
<input checked="" type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users
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<input type="checkbox"/> WECC	<input type="checkbox"/>	
<input type="checkbox"/> NA - Not Applicable		

**Comment Form – Transmission Operator Certification Standards, Draft 3**

---

Group Comments (Complete this page if comments are from a group.)

**Group Name:**

**Lead Contact:**

**Contact Organization:**

**Contact Segment:**

**Contact Telephone:**

**Contact Email:**

<b>Additional Member Name</b>	<b>Additional Member Organization</b>	<b>Region*</b>	<b>Segment*</b>

\*If more than one Region or Segment applies, indicate the best fit for the purpose of these comments.  
Regional acronyms and segment numbers are shown on prior page.

**Background Information:**

To understand the Standard Drafting Team’s philosophy used to create the standard, refer to the Transmission Operator Certification SAR, the Functional Model, and its Technical Discussion Document. These documents were used in the drafting of the standard and can be accessed at the following links:

[ftp://www.nerc.com/pub/sys/all\\_updl/standards/sar/TOP\\_CERTIFICATION\\_01\\_03.pdf](ftp://www.nerc.com/pub/sys/all_updl/standards/sar/TOP_CERTIFICATION_01_03.pdf)  
<http://www.nerc.com/~filez/functionalmode.html>

Changes were made in the drafting of the standard to reflect the revisions made to the Functional Model since the drafting of the SAR.

The Certification Standard Drafting Team would like to receive industry comments on this group of standards. Accordingly, we request your comments included on this form, emailed to [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the subject “Transmission Operator Certification Standards Comments” by **October 15, 2005**.

**Standard – ORG-001-1 – Transmission Operator Certification – Certification**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard. In addition, the Drafting Team removed the requirement of a site-visit because it was redundant with the elements of the administrative process. The removal of this requirement does not eliminate the need for a site visit from the process, but merely places the elements in the certification administrative process.

1. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Certification standard? If not, please explain in the comment area.

Yes

No

Comments:

There does not seem to be a requirement that in order to be certified the TOP must demonstrate how it adheres to all the NERC cyber security standards. Cyber Security references in this existing certification document are limited to Loss of Control Center and Emergencies.

**Standard – ORG-002-1 – Transmission Operator Certification – Agreements**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting Team has made modification to provide clarification to the standard. In addition, the Drafting Team has removed the requirement for the TOP to sign the NERC Confidentiality Agreement. It was identified during the comment period that some TOPs can perform their responsibilities without having access to this ISN data. If this can be accomplished, there is no justification for this requirement. The removal of this requirement from the standard does not eliminate the need to sign the confidentiality agreement if the entity requires access to the ISN data.

2. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Agreements standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-003-1 – Transmission Operator Certification – Personnel**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

3. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Personnel standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-004-1 – Transmission Operator Certification – Data Acquisition and Monitoring**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

4. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Data Acquisition and Monitoring standard? If not, please explain in the comment area.

Yes

No

Comments:

**Standard – ORG-007-1 – Transmission Operator Certification – Loss of Control Center Functionality**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

5. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Loss of Control Center Functionality standard? If not, please explain in the comment area.

Yes

No

Comments:

6. During the 2<sup>nd</sup> posting of the TOP Certification Standards, industry consensus was obtained for the Introduction, Requirements, Measures, and Compliance elements of:

**ORG-005 - Transmission Operator Certification — System Analysis**

**ORG-006 - Transmission Operator Certification — Emergency Operations**

**ORG-008 - Transmission Operator Certification — Restoration.**

The Drafting Team is not asking any specific questions related to these standards, but is providing an opportunity for comments related to them.

Comments:

Please modify these Certification Standards to reference specific existing Standards requirements and delete all restatements or rewording of those Standards requirements in these Certification Standards. These Certification Standards should require the TOP to prove how it meets the requirements of the existing Standards. It should not be imposing new requirements on the TOP, or providing the opportunity for new requirements to be imposed on the TOP.

7. Please identify any elements that should be included in the standards that have not been identified?

Comments:

8. Please identify any regional differences that should be included in the standards? (Please identify the standard, the requirement, and specific difference that needs to be included in the requirement)

Comments:

9. Do you agree with the proposed implementation plan? If not, please explain in the comment area.

Yes

No

Comments:

10. The Drafting Team believes that the TOP Certification standards are ready for ballot. Do you support this position? If not, please explain in the comment area.

Yes

No

Comments:

Entergy suggests this standard will not be ready for balloting until the cyber security requirements are added. There does not seem to be a requirement that in order to be certified the TOP must demonstrate how it adheres to all the NERC cyber security standards. Cyber Security references in this existing certification document are limited to Loss of Control Center and Emergencies.

We also suggest all specific requirements be deleted from these certification standards. TOP's should show how they meet the requirements in the Standards, not how they meet the requirements of these certification standards which may not be the same as the Standards.



**Comment Form – Transmission Operator Certification Standards, Draft 3**

---

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  - Do not submit a response in an unprotected copy of this form.

<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	Anita Lee
Organization:	AESO - Alberta Electric System Operators
Telephone:	403 539-2497
Email:	anita.lee@aeso.ca
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
<input type="checkbox"/> ECAR	<input checked="" type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
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<input type="checkbox"/> NA - Not Applicable	



**Background Information:**

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<http://www.nerc.com/~filez/functionalmode.html>

Changes were made in the drafting of the standard to reflect the revisions made to the Functional Model since the drafting of the SAR.

The Certification Standard Drafting Team would like to receive industry comments on this group of standards. Accordingly, we request your comments included on this form, emailed to [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the subject “Transmission Operator Certification Standards Comments” by **October 15, 2005**.

**Standard – ORG-001-1 – Transmission Operator Certification – Certification**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard. In addition, the Drafting Team removed the requirement of a site-visit because it was redundant with the elements of the administrative process. The removal of this requirement does not eliminate the need for a site visit from the process, but merely places the elements in the certification administrative process.

1. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Certification standard? If not, please explain in the comment area.

Yes

No

Comments: i). With regards to R3, Is there a defined "NERC certification process transmission operators"?

**Standard – ORG-002-1 – Transmission Operator Certification – Agreements**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting Team has made modification to provide clarification to the standard. In addition, the Drafting Team has removed the requirement for the TOP to sign the NERC Confidentiality Agreement. It was identified during the comment period that some TOPs can perform their responsibilities without having access to this ISN data. If this can be accomplished, there is no justification for this requirement. The removal of this requirement from the standard does not eliminate the need to sign the confidentiality agreement if the entity requires access to the ISN data.

2. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Agreements standard? If not, please explain in the comment area.

Yes

No

Comments: For each element in Requirements 1.1 to 1.7, we suggest to replace the word "commitment" with "obligation". Obligation is a stronger word.

**Standard – ORG-003-1 – Transmission Operator Certification – Personnel**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

3. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Personnel standard? If not, please explain in the comment area.

Yes

No

Comments: R2.1 (training program) is general and completely subjective. This Requirement needs more specificity.

**Standard – ORG-004-1 – Transmission Operator Certification – Data Acquisition and Monitoring**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

4. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Data Acquisition and Monitoring standard? If not, please explain in the comment area.

Yes

No

Comments: (i)- Requirement 1 - "periodicity of transmittal" and "time frame" appear to mean the same thing.

(ii)- In order to be consistent with the content and intent of this certification standard, the wording in the Purpose section need to be modified to include more than real-time data (e.g. generator maintenance plan, transmission maintenance plan, etc).

(iii)- The sub-requirements of R2 should include "synchronizing facilities"

**Standard – ORG-007-1 – Transmission Operator Certification – Loss of Control Center Functionality**

Based on comments received during the 2<sup>nd</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

5. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Loss of Control Center Functionality standard? If not, please explain in the comment area.

Yes

No

Comments: R1, Bullet 5: This is too general and allows much wiggle room. Suggest "Loss of control center building functions, e.g., HVAC, power, water, etc."

6. During the 2<sup>nd</sup> posting of the TOP Certification Standards, industry consensus was obtained for the Introduction, Requirements, Measures, and Compliance elements of:

**ORG-005 - Transmission Operator Certification — System Analysis**

**ORG-006 - Transmission Operator Certification — Emergency Operations**

**ORG-008 - Transmission Operator Certification — Restoration.**

The Drafting Team is not asking any specific questions related to these standards, but is providing an opportunity for comments related to them.

Comments: a). With regards to Emergency Operations, please see the comments below:

(i)- The entity seeking certification must have the capability to continue operations during emergency conditions. The entity must have communication protocols in place to allow other transmission entities to communicate vital information via more than one communication media. This needs to be clearly reflected/updated in the standard.

(ii)- re: R1: It needs to be indicated that TOP's processes and directing the actions are applicable to Generator Operator(s), Transmission Owner(s), Load Serving entities and Distribution Provider(s). It should be consistent with ORG-002 (TOP Certification- Agreements).

(iii)- ORG-006, change A3 from Transmission Operators to Transmission Operator

b). With regards to "Restoration" Standard, please see the comments below:

(i) There may be a need to included a minimum list of items that need to be included in the TOP restoration plan

7. Please identify any elements that should be included in the standards that have not been identified?

Comments: i)- The AESO has a general concern with regard to the existing NERC Registration Process and the ultimate TOP Certification Process. The concern regards the consistency, or lack thereof, of TOP registrations already performed, and the various interpretations within the industry of what constitutes a TOP. The ISO/RTO Council believes that guidelines must be established that provide consistency in registration and ultimately certification. Our understanding is that these issues are under consideration at the Functional Model Working Group and we would ask that these guidelines be developed and included in the revised Functional Model or be included in the implementation plan for the TOP Certification Standard.

(ii)- With regards to the definition of the Agreement, we recommend that following wording should be used for the proposed statement/definition of Agreement, i.e. "For purposes of applying the term 'Agreement' within this standard it shall mean: A contract or other document delineating an arrangement that expresses assent and or obligation by two or more parties to the same object. This arrangement determines a course of action to be followed by all parties involved in the situation. The key components of the agreement must identify the ability, intent, and authority of the parties. The requirement for an agreement can be satisfied in a variety of ways, including but not limited to: contracts, designation of authority documents, market rules, policies, and procedures.

(iii)- It is expected that audits will be conducted for these standards. In that case, we suggest that a retention period for any audit records and results be specified.

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8. Please identify any regional differences that should be included in the standards? (Please identify the standard, the requirement, and specific difference that needs to be included in the requirement)

Comments:

9. Do you agree with the proposed implementation plan? If not, please explain in the comment area.

Yes

No

Comments: The implementation and application of this standard in terms of coordination with other Functional Model related entities should need to allow for a transition period until the other FM related entities are either fully registered or certified. Moreover, these entities (such as GOP, DP, etc..) need to be clearly defined and registered/certified before the implementation of this certification standard.

10. The Drafting Team believes that the TOP Certification standards are ready for ballot. Do you support this position? If not, please explain in the comment area.

Yes

No

Comments: Once our above comments are incorporated then we would consider these ready for balloting.