

## **SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

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

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

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

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

### **Background**

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

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

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

Certification Criteria are those requirements that an entity must meet to be “Certified” by NERC or another certifying entity such as one of the NERC Regions. NERC Certification is an indication that an organization has the resources in place and the ability to perform a reliability function, such as a Balancing Authority, Interchange Authority, etc. Entities that attain their Certification status must comply with applicable NERC Reliability Standards and criteria.

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

**Questions 1-7 address the proposed Process for certifying Transmission Operator**

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

Yes  
 No  
 Neutral

Comments:

**2. Who should certify the Transmission Operator?**

Region  
 NERC  
 RTO  
 Independent Team

Comments:

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

In the certification process we expect to use questionnaires to collect much of the data. An area of concern is with the number of questionnaires that could be required. We will have several entities applying for certification at one time, and each entity may apply for more than one type of certification. We need some guidance on a fair method of determining how many questionnaires are needed.

**3. When we are certifying the Transmission Operator, please indicate how many of the Adjacent Transmission Operators should complete a questionnaire:**

All

Some fair percentage

Suggestions on how to determine a fair percentage:

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

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

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

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

Yes

No

**Comments:**

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

- Yes  
 No

Comments:

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

- Yes  
 No

Comments:

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

- Yes  
 No

Comments:

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

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

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

- Each applicable Reliability Authority  
 Each applicable Transmission Service Provider  
 Each applicable Distribution Provider

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

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

Comments:

**10. Do you think there is a need to have the entity performing the Transmission Operator function sign the NERC Confidentiality Agreement?**

- Yes
- No
- Neutral

Comments:

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

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

Comments:

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

- Yes
- No

Comments:

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

Yes

No

Comments: Allow a single certification for traditional Control Areas.

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

Regional Difference:

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

Comments:

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

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

Check all that apply

Periodic

Significant change in footprint, corporate organization, or operation

Repetitive Non-Compliance with Reliability Standards

Flagrant violation of Reliability Standards

**Comments:**

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

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

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

### **Background**

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

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

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Certification Criteria are those requirements that an entity must meet to be “Certified” by NERC or another certifying entity such as one of the NERC Regions. NERC Certification is an indication that an organization has the resources in place and the ability to perform a reliability function, such as a Balancing Authority, Interchange Authority, etc. Entities that attain their Certification status must comply with applicable NERC Reliability Standards and criteria.

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

**Questions 1-7 address the proposed Process for certifying Transmission Operator**

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

Yes  
 No  
 Neutral

Comments: This SAR requires certification of the Organizations who will 'operate and maintain the transmission facilities, and execute switching orders'. The reliability Standards that govern these activities have not been developed. It is therefore premature to certify a performing organization when the rules have not been developed. In addition, operation, maintenance and switching are distinct activities that may not be performed by the same organization. That renders this certification of no value.

**2. Who should certify the Transmission Operator?**

Region  
 NERC  
 RTO  
 Independent Team

Comments: Any transmission operation certification should be handled by the cognizant RTO.

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In the certification process we expect to use questionnaires to collect much of the data. An area of concern is with the number of questionnaires that could be required. We will have several entities applying for certification at one time, and each entity may apply for more than one type of certification. We need some guidance on a fair method of determining how many questionnaires are needed.

**3. When we are certifying the Transmission Operator, please indicate how many of the Adjacent Transmission Operators should complete a questionnaire:**

All

Some fair percentage

Suggestions on how to determine a fair percentage: None, NERC shouldn't be doing this.

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

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

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

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

Yes

No

**Comments: This list is a mix of functions and organizations. Any review team members need to have appropriate knowledge and experience in Transmission Operations. Perhaps you should provide for Certification of review team members.**

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

Yes

No

Comments: Certification of a Transmission Operating Organization (vs. personnel operating transmission) is not a core reliability function and is out of NERC scope.

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

Yes

No

Comments: The NERC Functional Model specifically states that it is not aligned with any organizational structure, nor will it define how functions are implemented. Establishing certification of an Organization performing a function changes the functional model into an organizational driver. This SAR should be cancelled.

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

Yes

No

Comments: Certification of the Transmission Operating Organizations will impose costs on the target organizations, the Regional Council and NERC. Recovery of these costs are not included in current Tariffs and operating agreements. If the operation, maintenance and switching activities are performed by multiple organizations, then multiple certifications would be needed. Until a thorough cost-benefit analysis is performed that clearly demonstrates a measurable reliability enhancement that justifies these costs, this SAR should be cancelled.

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

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

An agreement defining responsibilities and authority (during normal and emergency

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conditions) of the Transmission Operator with respect to

- Each applicable Reliability Authority
- Each applicable Transmission Service Provider
- Each applicable Distribution Provider

Comments: This is independent of any certification program.

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

Comments: Not sure why the balancing authority is singled out for this question.

**10. Do you think there is a need to have the entity performing the Transmission Operator function sign the NERC Confidentiality Agreement?**

- Yes
- No
- Neutral

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

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

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

Comments: See comment above.

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

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Yes

No

Comments: Eliminate Establishing limits (5.4.2) as this is not the operator's function

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

Yes

No

Comments: The entity that operates and maintains should have provisions for the physical security of the installed transmission equipment. It should also have requirements for the development, review and approval of switching procedures to assure that switching operations do not compromise reliability.

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

Regional Difference:

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

Comments: This SAR should be cancelled.

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

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

Check all that apply

Periodic

Significant change in footprint, corporate organization, or operation

Repetitive Non-Compliance with Reliability Standards

Flagrant violation of Reliability Standards

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

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

**Questions 1-7 address the proposed Process for certifying Transmission Operator**

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

- Yes  
 No  
 Neutral

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

**2. Who should certify the Transmission Operator?**

- Region  
 NERC  
 RTO  
 Independent Team

Comments:

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

In the certification process we expect to use questionnaires to collect much of the data. An area of concern is with the number of questionnaires that could be required. We will have several entities applying for certification at one time, and each entity may apply for more than one type of certification. We need some guidance on a fair method of determining how many questionnaires are needed.

**3. When we are certifying the Transmission Operator, please indicate how many of the Adjacent Transmission Operators should complete a questionnaire:**

- All
- Some fair percentage

Suggestions on how to determine a fair percentage: 75

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

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

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

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

- Yes
- No

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

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

Yes

No

Comments:

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

Yes

No

Comments:

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

Yes

No

Comments:

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

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

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

Each applicable Reliability Authority

Each applicable Transmission Service Provider

Each applicable Distribution Provider

Comments:

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

Comments:

**10. Do you think there is a need to have the entity performing the Transmission Operator function sign the NERC Confidentiality Agreement?**

- Yes
- No
- Neutral

Comments:

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

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

Comments:

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

- Yes
- No

Comments:

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

**Questions 1-7 address the proposed Process for certifying Transmission Operator**

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

- Yes  
 No  
 Neutral

Comments: TOs need to be certified because they perform reliability functions. But I feel certification should be considered a business practice and should not be included in this SAR. See also #15.

**2. Who should certify the Transmission Operator?**

- Region  
 NERC  
 RTO  
 Independent Team

Comments:

## **SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

In the certification process we expect to use questionnaires to collect much of the data. An area of concern is with the number of questionnaires that could be required. We will have several entities applying for certification at one time, and each entity may apply for more than one type of certification. We need some guidance on a fair method of determining how many questionnaires are needed.

### **3. When we are certifying the Transmission Operator, please indicate how many of the Adjacent Transmission Operators should complete a questionnaire:**

All

Some fair percentage

Suggestions on how to determine a fair percentage:

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

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

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

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

Yes

No

**Comments:**

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

- Yes  
 No

Comments: It's not clear to me why NERC Staff was singled out in this questionnaire. Review teams should be comprised of individuals with appropriate transmission operation expertise and experience. Few, if any, current NERC staff members have relevant transmission operations experience.

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

- Yes  
 No

Comments: See also #15. The certification process should not be included in this SAR. The criteria for a TO should be included in a SAR, however.

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

- Yes  
 No

Comments: The certification procedure should also include a process for decertification. We have found this necessary as control areas merge or cease to operate. TOs may also be subject to mergers and acquisitions so a decertification process is desirable.

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

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

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

- Each applicable Reliability Authority

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

**Questions 1-7 address the proposed Process for certifying Transmission Operator**

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

Yes  
 No  
 Neutral

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

**2. Who should certify the Transmission Operator?**

Region  
 NERC  
 RTO  
 Independent Team

## **SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

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**3. When we are certifying the Transmission Operator, please indicate how many of the Adjacent Transmission Operators should complete a questionnaire:**

All

Some fair percentage

Suggestions on how to determine a fair percentage: All means ALL

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

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

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

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

Yes

No

**Comments: The Review Team MUST be composed of representatives of each applicable Authority and Function that is immediately and directly effected by the activities and function of the Transmission Operator. Procedures and Processes must also be developed as to what composes "consensus", Is it 100% of the review team, 90%, 75%, 51% ?**

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

Yes

No

Comments: It will simply drive up the COST to all participants

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

Yes

No

Comments: Much of what is included is ill defined and subject to individual interpretation .

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

Yes

No

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

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

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

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

Each applicable Reliability Authority

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Each applicable Transmission Service Provider

Each applicable Distribution Provider

Comments:

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

Comments: The same as those described in the other related SARs

**10. Do you think there is a need to have the entity performing the Transmission Operator function sign the NERC Confidentiality Agreement?**

Yes

No

Neutral

Comments:

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

Reliability Authorities

Balancing Authorities

Interchange Authorities

Transmission Operators

Transmission Service Providers

Comments:

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

Yes

No

Comments: see my previous answer

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

Yes

No

Comments: see my previous answer

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

Regional Difference: There are Multiple Differences and Variations, to many to be cited herein.

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

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

We have the cart before the Horse.

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

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

Check all that apply

Periodic

Significant change in footprint, corporate organization, or operation

Repetitive Non-Compliance with Reliability Standards

Flagrant violation of Reliability Standards

**Comments:**

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

<b>SAR Commenter Information</b>	<b>Which Industry Segment do you represent?</b>
Name            Dave Christiano	<input type="checkbox"/> Trans Owners <input type="checkbox"/> <b>Brokers, Aggregators, and Marketers</b>
Organization    City Utilities of Springfield	<input type="checkbox"/> RTOs, ISOs, RRCs <input type="checkbox"/> Large Electricity End Users
Telephone        417-831-8559	<input checked="" type="checkbox"/> LSEs <input type="checkbox"/> Small Electricity Users
E-mail s.net                dave.christiano@cityutilitie	<input type="checkbox"/> TDUs <input type="checkbox"/> <b>Federal, State, and Provincial Regulatory or other Government Entities</b>
	<input type="checkbox"/> Generators

**Questions 1-7 address the proposed Process for certifying Transmission Operator**

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

Yes  
 No  
 Neutral

Comments:

**2. Who should certify the Transmission Operator?**

Region  
 NERC  
 RTO  
 Independent Team

Comments:

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

In the certification process we expect to use questionnaires to collect much of the data. An area of concern is with the number of questionnaires that could be required. We will have several entities applying for certification at one time, and each entity may apply for more than one type of certification. We need some guidance on a fair method of determining how many questionnaires are needed.

**3. When we are certifying the Transmission Operator, please indicate how many of the Adjacent Transmission Operators should complete a questionnaire:**

- All
- Some fair percentage

Suggestions on how to determine a fair percentage:

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

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

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

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

- Yes
- No

**Comments:**

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

- Yes  
 No

Comments:

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

- Yes  
 No

Comments: The SAR looks more like the Standard itself rather than a SAR. I agree that the Organization Certification Task Force is probably well qualified to draft the Standard, yet isn't this the task for the Standards Drafting Team? I realize the OCTF held workshops and posted a white-paper but it just seems that it was out-of-sync with the standards adoption procedure (i.e. premature).

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

- Yes  
 No

Comments: See comment in #6 above.

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

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

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

- Each applicable Reliability Authority  
 Each applicable Transmission Service Provider

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

Each applicable Distribution Provider

Comments:

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

Comments:

**10. Do you think there is a need to have the entity performing the Transmission Operator function sign the NERC Confidentiality Agreement?**

Yes

No

Neutral

Comments:

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

Reliability Authorities

Balancing Authorities

Interchange Authorities

Transmission Operators

Transmission Service Providers

Comments:

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

Yes

No

Comments: See answer to #6 above.

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

Yes

No

Comments:

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

Regional Difference: None

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

Comments:

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

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

Check all that apply

Periodic

Significant change in footprint, corporate organization, or operation

Repetitive Non-Compliance with Reliability Standards

Flagrant violation of Reliability Standards

**Comments:**

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

SAR Commenter Information		Which Industry Segment do you represent?	
Name	Joseph J. Krupar	<input type="checkbox"/> Trans Owners	<input type="checkbox"/> <b>Brokers, Aggregators, and Marketers</b>
Organization	Florida Municipal Power Agency	<input type="checkbox"/> RTOs, ISOs, RRCs	<input type="checkbox"/> Large Electricity End Users
Telephone	407-355-7767	<input checked="" type="checkbox"/> LSEs	<input type="checkbox"/> Small Electricity Users
E-mail	joe.krupar@fmpa.com	<input type="checkbox"/> TDUs	<input type="checkbox"/> <b>Federal, State, and Provincial Regulatory or other Government Entities</b>
		<input type="checkbox"/> Generators	

**Questions 1-7 address the proposed Process for certifying Transmission Operator**

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

- Yes  
 No  
 Neutral

Comments: The second whereas in the NERC BYLAWS is as follows: "WHEREAS, the principal mission of the North American Electric Reliability Council, hereinafter referred to as the Corporation, is to promote the reliability and adequacy of electric supply by the electric systems of North America, including through standards that provide for an adequate level of reliability of the bulk electric power systems of North America;" The phrase "through standards that provide for an adequate level of reliability of the bulk electric power systems of North America" is important when looking at SARs. Then looking at the Certification of Transmission Operators SAR, I wonder how certification of a Transmission Operator that does not affect the reliability of the bulk electric power system fits within the NERC BYLAWS. It is recommended that the SAR be changed to certify only the bulk electric power system Transmission Operator function.

**2. Who should certify the Transmission Operator?**

- Region  
 NERC  
 RTO  
 Independent Team

Comments:

## **SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

In the certification process we expect to use questionnaires to collect much of the data. An area of concern is with the number of questionnaires that could be required. We will have several entities applying for certification at one time, and each entity may apply for more than one type of certification. We need some guidance on a fair method of determining how many questionnaires are needed.

### **3. When we are certifying the Transmission Operator, please indicate how many of the Adjacent Transmission Operators should complete a questionnaire:**

- All
- Some fair percentage

Suggestions on how to determine a fair percentage: Only adjacent bulk electric power system Transmission Operators.

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

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

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

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

- Yes
- No

**Comments: The Transmission Operator should be changed to the bulk electric power system Transmission Operator.**

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

Yes

No

Comments:

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

Yes

No

Comments: Reference to the IDC should be removed in step 6. The phrase "for the IDC" should be removed in step 6.

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

Yes

No

Comments:

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

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

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

Each applicable Reliability Authority

Each applicable Transmission Service Provider

Each applicable Distribution Provider

Comments:

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

Comments: No other agreements should be required for the Transmission Operator.

**10. Do you think there is a need to have the entity performing the Transmission Operator function sign the NERC Confidentiality Agreement?**

- Yes
- No
- Neutral

Comments: The Standards of Conduct should be all that is necessary.

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

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

Comments:

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

- Yes
- No

Comments: The Transmission Operator Criteria should be changed to include only the bulk electric power system Transmission Operator.

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

Yes

No

Comments:

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

Regional Difference:

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

Comments:

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

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

Check all that apply

Periodic

Significant change in footprint, corporate organization, or operation

Repetitive Non-Compliance with Reliability Standards

Flagrant violation of Reliability Standards

**Comments:**

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

**Questions 1-7 address the proposed Process for certifying Transmission Operator**

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

Yes  
 No  
 Neutral

Comments:

**2. Who should certify the Transmission Operator?**

Region  
 NERC  
 RTO  
 Independent Team

Comments:

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

In the certification process we expect to use questionnaires to collect much of the data. An area of concern is with the number of questionnaires that could be required. We will have several entities applying for certification at one time, and each entity may apply for more than one type of certification. We need some guidance on a fair method of determining how many questionnaires are needed.

**3. When we are certifying the Transmission Operator, please indicate how many of the Adjacent Transmission Operators should complete a questionnaire:**

All

Some fair percentage

Suggestions on how to determine a fair percentage:

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

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

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

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

Yes

No

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

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

Yes

No

Comments:

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

Yes

No

Comments:

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

Yes

No

Comments:

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

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

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

Each applicable Reliability Authority

Each applicable Transmission Service Provider

Each applicable Distribution Provider

Comments:

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

Comments:

**10. Do you think there is a need to have the entity performing the Transmission Operator function sign the NERC Confidentiality Agreement?**

- Yes
- No
- Neutral

Comments:

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

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

Comments: IAs should only be required to sign a confidentiality agreement if they are an independent entity. We believe IAs are market participants.

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

- Yes
- No

Comments:

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

Yes

No

Comments:

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

Regional Difference:

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

Comments:

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

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

Check all that apply

Periodic

Significant change in footprint, corporate organization, or operation

Repetitive Non-Compliance with Reliability Standards

Flagrant violation of Reliability Standards

**Comments:**

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

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

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

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

Yes  
 No  
 Neutral

Comments:

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

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

Comments

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

- Region
- NERC
- RTO
- Independent Team

Comments:

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

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

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

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

- Yes
- No

Comments:

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

- Yes
- No

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



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

Yes

No

Comments:

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

Yes

No

Comments:

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

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

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

Each adjacent Reliability Authority

Each applicable Balancing Authority

Each applicable Interchange Authority

Each applicable Transmission Operator

Each applicable Transmission Service Provider

Comments:

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

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

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

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

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

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

- Yes
- No

Comments:

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

- Yes
- No

Comments:

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

Regional Difference: None

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

Comments: None

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

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

Check all that apply

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

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

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

<b>SAR Commenter Information</b>		<b>Which Industry Segment do you represent?</b>	
Name	James R. Regg	<input checked="" type="checkbox"/> Trans Owners	<input type="checkbox"/> <b>Brokers, Aggregators, and Marketers</b>
Organization	Tennessee Valley Authority	<input type="checkbox"/> RTOs, ISOs, RRCs	<input type="checkbox"/> Large Electricity End Users
Telephone	423.751.6027	<input type="checkbox"/> LSEs	<input type="checkbox"/> Small Electricity Users
E-mail	jregg@tva.gov	<input type="checkbox"/> TDUs	<input type="checkbox"/> <b>Federal, State, and Provincial Regulatory or other Government Entities</b>
		<input type="checkbox"/> Generators	

**Questions 1-7 address the proposed Process for certifying Transmission Operator**

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

Yes  
 No  
 Neutral

Comments:

**2. Who should certify the Transmission Operator?**

Region  
 NERC  
 RTO  
 Independent Team

Comments:

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

In the certification process we expect to use questionnaires to collect much of the data. An area of concern is with the number of questionnaires that could be required. We will have several entities applying for certification at one time, and each entity may apply for more than one type of certification. We need some guidance on a fair method of determining how many questionnaires are needed.

**3. When we are certifying the Transmission Operator, please indicate how many of the Adjacent Transmission Operators should complete a questionnaire:**

- All  
 Some fair percentage

Suggestions on how to determine a fair percentage: 20% would be a fair representation of the group.

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

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

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

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

- Yes  
 No

**Comments: The listed positions make up a fair group from TVA's perspective.**

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

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

- Yes  
 No

Comments: Only if he/she meets qualifications to understand the position.

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

- Yes  
 No

Comments: The Transmissio Operator position is covered well.

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

- Yes  
 No

Comments:

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

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

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

- Each applicable Reliability Authority  
 Each applicable Transmission Service Provider  
 Each applicable Distribution Provider

Comments:

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

Comments: None.

**10. Do you think there is a need to have the entity performing the Transmission Operator function sign the NERC Confidentiality Agreement?**

- Yes
- No
- Neutral

Comments:

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

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

Comments:

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

- Yes
- No

Comments:

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

Yes

No

Comments:

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

Regional Difference: None.

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

Comments: None.

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

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

Check all that apply

Periodic

Significant change in footprint, corporate organization, or operation

Repetitive Non-Compliance with Reliability Standards

Flagrant violation of Reliability Standards

**Comments:**

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

<b>SAR Commenter Information</b>	<b>Which Industry Segment do you represent?</b>
Name           Walter Cintron	<input checked="" type="checkbox"/> Trans Owners <input type="checkbox"/> <b>Brokers, Aggregators, and Marketers</b>
Organization   Con Edison of N.Y.	<input type="checkbox"/> RTOs, ISOs, RRCs <input type="checkbox"/> Large Electricity End Users
Telephone       212 5808684	<input type="checkbox"/> LSEs <input type="checkbox"/> Small Electricity Users
E-mail           cintronw@coned.com	<input type="checkbox"/> TDUs <input type="checkbox"/> <b>Federal, State, and Provincial Regulatory or other Government Entities</b>
	<input type="checkbox"/> Generators

**Questions 1-7 address the proposed Process for certifying Transmission Operator**

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

Yes  
 No  
 Neutral

Comments:

**2. Who should certify the Transmission Operator?**

Region  
 NERC  
 RTO  
 Independent Team

Comments:

## **SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

In the certification process we expect to use questionnaires to collect much of the data. An area of concern is with the number of questionnaires that could be required. We will have several entities applying for certification at one time, and each entity may apply for more than one type of certification. We need some guidance on a fair method of determining how many questionnaires are needed.

**3. When we are certifying the Transmission Operator, please indicate how many of the Adjacent Transmission Operators should complete a questionnaire:**

All

Some fair percentage

Suggestions on how to determine a fair percentage:

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

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

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

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

Yes

No

**Comments:**

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

Yes

No

Comments:

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

Yes

No

Comments:

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

Yes

No

Comments:

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

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

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

Each applicable Reliability Authority

Each applicable Transmission Service Provider

Each applicable Distribution Provider

Comments:

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

Comments:

**10. Do you think there is a need to have the entity performing the Transmission Operator function sign the NERC Confidentiality Agreement?**

Yes

No

Neutral

Comments:

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

Reliability Authorities

Balancing Authorities

Interchange Authorities

Transmission Operators

Transmission Service Providers

Comments:

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

Yes

No

Comments:

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

Yes

No

Comments:

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

Regional Difference:

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

Comments: This SAR for the ISO's seems to be appropriate. When the decision for certification is made for member transmission control centers that are part of an ISO then that process must be reviewed as the current method of testing for the transmission operator leaves much to be desired.

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

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

Check all that apply

Periodic

Significant change in footprint, corporate organization, or operation

Repetitive Non-Compliance with Reliability Standards

Flagrant violation of Reliability Standards

**Comments:**

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

**Questions 1-7 address the proposed Process for certifying Transmission Operator**

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

Yes  
 No  
 Neutral

Comments:

**2. Who should certify the Transmission Operator?**

Region  
 NERC  
 RTO  
 Independent Team

Comments:

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

In the certification process we expect to use questionnaires to collect much of the data. An area of concern is with the number of questionnaires that could be required. We will have several entities applying for certification at one time, and each entity may apply for more than one type of certification. We need some guidance on a fair method of determining how many questionnaires are needed.

**3. When we are certifying the Transmission Operator, please indicate how many of the Adjacent Transmission Operators should complete a questionnaire:**

- All
- Some fair percentage

Suggestions on how to determine a fair percentage:

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

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

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

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

- Yes
- No

**Comments:**

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

- Yes  
 No

Comments:

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

- Yes  
 No

Comments:

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

- Yes  
 No

Comments:

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

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

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

- Each applicable Reliability Authority  
 Each applicable Transmission Service Provider  
 Each applicable Distribution Provider

Comments:

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

Comments:

**10. Do you think there is a need to have the entity performing the Transmission Operator function sign the NERC Confidentiality Agreement?**

- Yes
- No
- Neutral

Comments:

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

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

Comments:

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

- Yes
- No

Comments:

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

Yes

No

Comments:

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

Regional Difference:

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

Comments:

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

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

Check all that apply

Periodic

Significant change in footprint, corporate organization, or operation

Repetitive Non-Compliance with Reliability Standards

Flagrant violation of Reliability Standards

**Comments:**

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

**Questions 1-7 address the proposed Process for certifying Transmission Operator**

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

Yes  
 No  
 Neutral

Comments:

**2. Who should certify the Transmission Operator?**

Region  
 NERC  
 RTO  
 Independent Team

Comments:

## **SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

In the certification process we expect to use questionnaires to collect much of the data. An area of concern is with the number of questionnaires that could be required. We will have several entities applying for certification at one time, and each entity may apply for more than one type of certification. We need some guidance on a fair method of determining how many questionnaires are needed.

**3. When we are certifying the Transmission Operator, please indicate how many of the Adjacent Transmission Operators should complete a questionnaire:**

All

Some fair percentage

Suggestions on how to determine a fair percentage:

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

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

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

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

Yes

No

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

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

- Yes  
 No

Comments: NERC Staff should review the certification decision for consistency.

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

- Yes  
 No

Comments:

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

- Yes  
 No

Comments:

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

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

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

- Each applicable Reliability Authority  
 Each applicable Transmission Service Provider  
 Each applicable Distribution Provider

Comments:

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

Comments:

**10. Do you think there is a need to have the entity performing the Transmission Operator function sign the NERC Confidentiality Agreement?**

Yes

No

Neutral

Comments:

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

Reliability Authorities

Balancing Authorities

Interchange Authorities

Transmission Operators

Transmission Service Providers

Comments:

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

Yes

No

Comments:

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

Yes

No

Comments:

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

Regional Difference:

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

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

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

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

Check all that apply

Periodic

Significant change in footprint, corporate organization, or operation

Repetitive Non-Compliance with Reliability Standards

Flagrant violation of Reliability Standards

**Comments:**

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

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

**Questions 1-7 address the proposed Process for certifying Transmission Operator**

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

- Yes  
 No  
 Neutral

Comments: National Grid agrees that the TO function is a reliability function as it relates to operation of Bulk Power Systems however there may be instances where control of various parts of the electric system may not be required to be operated by certified personnel or may be under the direction of other senior personnel who are certified.

**2. Who should certify the Transmission Operator?**

- Region  
 NERC  
 RTO  
 Independent Team

Comments:

## **SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

In the certification process we expect to use questionnaires to collect much of the data. An area of concern is with the number of questionnaires that could be required. We will have several entities applying for certification at one time, and each entity may apply for more than one type of certification. We need some guidance on a fair method of determining how many questionnaires are needed.

**3. When we are certifying the Transmission Operator, please indicate how many of the Adjacent Transmission Operators should complete a questionnaire:**

- All
- Some fair percentage

Suggestions on how to determine a fair percentage: National Grid recommends the greater of, 25% or 2 adjacent operators.

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

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

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

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

- Yes
- No

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

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

the four categories, IA,RA,BA, and TO.

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

Yes

No

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

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

Yes

No

Comments:

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

Yes

No

Comments: National Grid agrees that the TO function is a reliability function as it relates to operation of Bulk Power Systems however there may be instances where control of various parts of the electric system may not be required to be operated by certified personnel or may be under the direction of other senior personnel who are certified.

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

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

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

## **SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

- Each applicable Reliability Authority
- Each applicable Transmission Service Provider
- Each applicable Distribution Provider

Comments: While National Grid recognizes that these entities must have agreements with the listed entities they may already reside in previous agreements.

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

Comments: Assuming this question was posed regarding the TO, NPCC believes no additional agreements would be necessary.

### **10. Do you think there is a need to have the entity performing the Transmission Operator function sign the NERC Confidentiality Agreement?**

- Yes
- No
- Neutral

Comments:

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

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

Comments: National Grid feels that all of the above need to sign the NERC Confidentiality Agreement if this is the "agreement" being referred to.

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

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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Yes

No

Comments:

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

Yes

No

Comments:

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

Regional Difference:

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

Comments: National Grid agrees that the TO function is a reliability function as it relates to operation of Bulk Power Systems however there may be instances where control of various parts of the electric system may not be required to be operated by certified personnel or may be under the direction of other senior personnel who are certified.

In addition the SAR doesn't seem clear whether it is applicable to the TO entity or the actual individual who are seeking NERC Operator Certification but rather both. It seems inconsistent.

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

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

Check all that apply

Periodic

Significant change in footprint, corporate organization, or operation

Repetitive Non-Compliance with Reliability Standards

Flagrant violation of Reliability Standards

**Comments:**

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

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

**Questions 1-7 address the proposed Process for certifying Transmission Operator**

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

- Yes  
 No  
 Neutral

Comments: NPCC agrees that the TO function is a reliability function as it relates to operation of Bulk Power Systems however there may be instances where control of various parts of the electric system may not be required to be operated by certified personnel or may be under the direction of other senior personnel who are certified.

**2. Who should certify the Transmission Operator?**

- Region  
 NERC  
 RTO  
 Independent Team

Comments:

## **SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

In the certification process we expect to use questionnaires to collect much of the data. An area of concern is with the number of questionnaires that could be required. We will have several entities applying for certification at one time, and each entity may apply for more than one type of certification. We need some guidance on a fair method of determining how many questionnaires are needed.

**3. When we are certifying the Transmission Operator, please indicate how many of the Adjacent Transmission Operators should complete a questionnaire:**

- All
- Some fair percentage

Suggestions on how to determine a fair percentage: NPCC recommends the greater of, 25% or 2 adjacent operators.

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

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

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

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

- Yes
- No

**Comments: If this question refers to categories yes-the categories are appropriate. NPCC also recommends that the individuals selected have broad, system wide operating system experience. NERC staff, while listed as a category, should not be a voting member. NPCC feels there should be a minimum of one representative from each of the four**

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

categories, IA,RA,BA, and TO.

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

- Yes  
 No

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

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

- Yes  
 No

Comments:

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

- Yes  
 No

Comments: NPCC agrees that the TO function is a reliability function as it relates to operation of Bulk Power Systems however there may be instances where control of various parts of the electric system may not be required to be operated by certified personnel or may be under the direction of other senior personnel who are certified.

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

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

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

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

- Each applicable Reliability Authority
- Each applicable Transmission Service Provider
- Each applicable Distribution Provider

Comments: While NPCC recognizes that these entities must have agreements with the listed entities they may already reside in previous agreements.

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

Comments: Assuming this question was posed regarding the TO, NPCC believes no additional agreements would be necessary.

### 10. Do you think there is a need to have the entity performing the Transmission Operator function sign the NERC Confidentiality Agreement?

- Yes
- No
- Neutral

Comments:

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

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

Comments: NPCC feels that all of the above need to sign the NERC Confidentiality Agreement if this is the "agreement" being referred to.

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

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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Yes

No

Comments:

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

Yes

No

Comments:

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

Regional Difference:

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

Comments: NPCC agrees that the TO function is a reliability function as it relates to operation of Bulk Power Systems however there may be instances where control of various parts of the electric system may not be required to be operated by certified personnel or may be under the direction of other senior personnel who are certified.

In addition the SAR doesn't seem clear whether it is applicable to the TO entity or the actual individual who are seeking NERC Operator Certification but rather both. It seems inconsistent.

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

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

Check all that apply

Periodic

Significant change in footprint, corporate organization, or operation

Repetitive Non-Compliance with Reliability Standards

Flagrant violation of Reliability Standards

**Comments:**

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

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

**Questions 1-7 address the proposed Process for certifying Transmission Operator**

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

- Yes  
 No  
 Neutral

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

**2. Who should certify the Transmission Operator?**

- Region  
 NERC  
 RTO  
 Independent Team

Comments:

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

In the certification process we expect to use questionnaires to collect much of the data. An area of concern is with the number of questionnaires that could be required. We will have several entities applying for certification at one time, and each entity may apply for more than one type of certification. We need some guidance on a fair method of determining how many questionnaires are needed.

**3. When we are certifying the Transmission Operator, please indicate how many of the Adjacent Transmission Operators should complete a questionnaire:**

All

Some fair percentage

Suggestions on how to determine a fair percentage:

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

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

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

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

Yes

No

**Comments: LSE's that are served by the TOP should be included as they are affected by TOP's action**

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

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

- Yes  
 No

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

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

- Yes  
 No

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

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

- Yes  
 No

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

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

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

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

- Each applicable Reliability Authority  
 Each applicable Transmission Service Provider  
 Each applicable Distribution Provider

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

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

Comments:

**10. Do you think there is a need to have the entity performing the Transmission Operator function sign the NERC Confidentiality Agreement?**

- Yes
- No
- Neutral

Comments:

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

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

Comments: Entities handling commercially sensitive information

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

- Yes
- No

Comments:

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

Yes

No

Comments: Definition of TOp functions insufficient, TOp should monitor, assess and maintain local reliability.

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

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

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

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

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

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

Check all that apply

Periodic

Significant change in footprint, corporate organization, or operation

Repetitive Non-Compliance with Reliability Standards

Flagrant violation of Reliability Standards

**Comments:**

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

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

**Questions 1-7 address the proposed Process for certifying Transmission Operator**

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

- Yes  
 No  
 Neutral

Comments: NYPA, as does NPCC, agrees that the TO function is a reliability function as it relates to operation of Bulk Power Systems however there may be instances where control of various parts of the electric system may not be required to be operated by certified personnel or may be under the direction of other senior personnel who are certified.

**2. Who should certify the Transmission Operator?**

- Region  
 NERC  
 RTO  
 Independent Team

Comments:

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

In the certification process we expect to use questionnaires to collect much of the data. An area of concern is with the number of questionnaires that could be required. We will have several entities applying for certification at one time, and each entity may apply for more than one type of certification. We need some guidance on a fair method of determining how many questionnaires are needed.

**3. When we are certifying the Transmission Operator, please indicate how many of the Adjacent Transmission Operators should complete a questionnaire:**

- All
- Some fair percentage

Suggestions on how to determine a fair percentage: NYPA, as does NPCC, recommends the greater of, 25% or 2 adjacent operators.

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

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

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

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

- Yes
- No

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

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

representative from each of the four categories, IA,RA,BA, and TO.

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

- Yes  
 No

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

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

- Yes  
 No

Comments:

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

- Yes  
 No

Comments: NYPA, as does NPCC, agrees that the TO function is a reliability function as it relates to operation of Bulk Power Systems however there may be instances where control of various parts of the electric system may not be required to be operated by certified personnel or may be under the direction of other senior personnel who are certified.

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

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

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

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

- Each applicable Reliability Authority
- Each applicable Transmission Service Provider
- Each applicable Distribution Provider

Comments: While NYPA, as does NPCC, recognizes that these entities must have agreements with the listed entities they may already reside in previous agreements.

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

Comments: Assuming this question was posed regarding the TO, NPCC believes no additional agreements would be necessary.

### 10. Do you think there is a need to have the entity performing the Transmission Operator function sign the NERC Confidentiality Agreement?

- Yes
- No
- Neutral

Comments:

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

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

Comments: NPCC feels that all of the above need to sign the NERC Confidentiality Agreement if this is the "agreement" being referred to.

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

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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Yes

No

Comments:

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

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

Yes

No

Comments:

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

Regional Difference:

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

Comments: NYPA, as does NPCC, agrees that the TO function is a reliability function as it relates to operation of Bulk Power Systems however there may be instances where control of various parts of the electric system may not be required to be operated by certified personnel or may be under the direction of other senior personnel who are certified.

In addition the SAR doesn't seem clear whether it is applicable to the TO entity or the actual individual who are seeking NERC Operator Certification but rather both. It seems inconsistent.

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

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

Check all that apply

Periodic

Significant change in footprint, corporate organization, or operation

Repetitive Non-Compliance with Reliability Standards

Flagrant violation of Reliability Standards

**Comments:**

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

**Questions 1-7 address the proposed Process for certifying Transmission Operator**

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

Yes  
 No  
 Neutral

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

**2. Who should certify the Transmission Operator?**

Region  
 NERC  
 RTO  
 Independent Team

Comments: Are you asking whether TO areas should be constrained by Regional boundaries? If more than one Region were to be involved in the TO certification, what process would be used if some Regions approved the certification and some declined? NERC should be the organization that certifies TO's. This removes a problem of conflicting regional requirements. MIPS and LTIS identified two scenarios: 1) NERC may elect to delegate that responsibility to a Regional Council in those cases where the area of the TO is contained entirely in one Region, and 2) In cases where the TO crosses regional boundaries, NERC should establish a balanced, cross-regional panel that would conduct a single certification process.

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

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**



In the certification process we expect to use questionnaires to collect much of the data. An area of concern is with the number of questionnaires that could be required. We will have several entities applying for certification at one time, and each entity may apply for more than one type of certification. We need some guidance on a fair method of determining how many questionnaires are needed.

**3. When we are certifying the Transmission Operator, please indicate how many of the Adjacent Transmission Operators should complete a questionnaire:**

All

Some fair percentage

Suggestions on how to determine a fair percentage:

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

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

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

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

Yes

No

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

**Any list should also require that those members of the certification team be knowledgeable in the relevant functions that would be performed by the TO requesting certification, and at least one member of the team should be NERC certified as a TO.**

**The certification process should clearly explain what would constitute consensus.**

**The Review Team must be composed of representatives of members from each applicable type of Authority and Function that is immediately and directly effected by the activities and function of the Transmission Operator.**

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

Yes

No

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

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

Yes

No

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

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

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

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

Yes

No

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

prior to completion of the certification process.

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

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

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

- Each applicable Reliability Authority
- Each applicable Transmission Service Provider
- Each applicable Distribution Provider

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

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

Comments: (Balancing Authority above should be Transmission Operator)

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

**10. Do you think there is a need to have the entity performing the Transmission Operator function sign the NERC Confidentiality Agreement?**

- Yes
- No
- Neutral

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

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

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

Comments: Relative to certifying TO's, the status of the other groups' signing is irrelevant. This question is beyond the scope of TO certification by asking about organizations other than the TO.

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

- Yes
- No

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

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

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

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

**Questions 1-7 address the proposed Process for certifying Transmission Operator**

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

Yes  
 No  
 Neutral

Comments:

**2. Who should certify the Transmission Operator?**

Region  
 NERC  
 RTO  
 Independent Team

Comments:

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

In the certification process we expect to use questionnaires to collect much of the data. An area of concern is with the number of questionnaires that could be required. We will have several entities applying for certification at one time, and each entity may apply for more than one type of certification. We need some guidance on a fair method of determining how many questionnaires are needed.

**3. When we are certifying the Transmission Operator, please indicate how many of the Adjacent Transmission Operators should complete a questionnaire:**

All

Some fair percentage

Suggestions on how to determine a fair percentage:

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

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

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

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

Yes

No

**Comments:**

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

- Yes  
 No

Comments:

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

- Yes  
 No

Comments:

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

- Yes  
 No

Comments:

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

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

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

- Each applicable Reliability Authority  
 Each applicable Transmission Service Provider  
 Each applicable Distribution Provider

Comments:

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

Comments:

**10. Do you think there is a need to have the entity performing the Transmission Operator function sign the NERC Confidentiality Agreement?**

- Yes
- No
- Neutral

Comments:

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

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

Comments:

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

- Yes
- No

Comments:

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

Yes

No

Comments:

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

Regional Difference:

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

Comments:

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

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

Check all that apply

Periodic

Significant change in footprint, corporate organization, or operation

Repetitive Non-Compliance with Reliability Standards

Flagrant violation of Reliability Standards

**Comments:**

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

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

**Questions 1-7 address the proposed Process for certifying Transmission Operator**

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

- Yes  
 No  
 Neutral

Comments: NPCC agrees that the TO function is a reliability function as it relates to operation of Bulk Power Systems however there may be instances where control of various parts of the electric system may not be required to be operated by certified personnel or may be under the direction of other senior personnel who are certified.

**2. Who should certify the Transmission Operator?**

- Region  
 NERC  
 RTO  
 Independent Team

Comments:

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

In the certification process we expect to use questionnaires to collect much of the data. An area of concern is with the number of questionnaires that could be required. We will have several entities applying for certification at one time, and each entity may apply for more than one type of certification. We need some guidance on a fair method of determining how many questionnaires are needed.

**3. When we are certifying the Transmission Operator, please indicate how many of the Adjacent Transmission Operators should complete a questionnaire:**

- All
- Some fair percentage

Suggestions on how to determine a fair percentage: NPCC recommends the greater of, 25% or 2 adjacent operators.

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

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

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

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

- Yes
- No

**Comments: If this question refers to categories yes-the categories are appropriate. NPCC also recommends that the individuals selected have broad, system wide operating system experience. NERC staff, while listed as a category, should not be a voting member. NPCC feels there should be a minimum of one representative from each of the four**

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categories, IA,RA,BA, and TO.

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

- Yes  
 No

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

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

- Yes  
 No

Comments:

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

- Yes  
 No

Comments: NPCC agrees that the TO function is a reliability function as it relates to operation of Bulk Power Systems however there may be instances where control of various parts of the electric system may not be required to be operated by certified personnel or may be under the direction of other senior personnel who are certified.

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

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

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

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

- Each applicable Reliability Authority
- Each applicable Transmission Service Provider
- Each applicable Distribution Provider

Comments: While NPCC recognizes that these entities must have agreements with the listed entities they may already reside in previous agreements.

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

Comments: Assuming this question was posed regarding the TO, NPCC believes no additional agreements would be necessary.

### 10. Do you think there is a need to have the entity performing the Transmission Operator function sign the NERC Confidentiality Agreement?

- Yes
- No
- Neutral

Comments:

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

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

Comments: NPCC feels that all of the above need to sign the NERC Confidentiality Agreement if this is the "agreement" being referred to.

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

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Yes

No

Comments:

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

Yes

No

Comments:

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

Regional Difference:

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

Comments: NPCC agrees that the TO function is a reliability function as it relates to operation of Bulk Power Systems however there may be instances where control of various parts of the electric system may not be required to be operated by certified personnel or may be under the direction of other senior personnel who are certified.

In addition the SAR doesn't seem clear whether it is applicable to the TO entity or the actual individual who are seeking NERC Operator Certification but rather both. It seems inconsistent.

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

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

Check all that apply

Periodic

Significant change in footprint, corporate organization, or operation

Repetitive Non-Compliance with Reliability Standards

Flagrant violation of Reliability Standards

**Comments:**

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

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

**Questions 1-7 address the proposed Process for certifying Transmission Operator**

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

- Yes  
 No  
 Neutral

Comments:

**2. Who should certify the Transmission Operator?**

- Region  
 NERC  
 RTO  
 Independent Team

Comments:

## **SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

In the certification process we expect to use questionnaires to collect much of the data. An area of concern is with the number of questionnaires that could be required. We will have several entities applying for certification at one time, and each entity may apply for more than one type of certification. We need some guidance on a fair method of determining how many questionnaires are needed.

**3. When we are certifying the Transmission Operator, please indicate how many of the Adjacent Transmission Operators should complete a questionnaire:**

- All
- Some fair percentage

Suggestions on how to determine a fair percentage: Greater of 25% or 2.

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

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

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

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

- Yes
- No

**Comments:**

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

Yes

No

Comments:

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

Yes

No

Comments:

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

Yes

No

Comments:

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

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

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

Each applicable Reliability Authority

Each applicable Transmission Service Provider

Each applicable Distribution Provider

Comments:

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

Comments:

**10. Do you think there is a need to have the entity performing the Transmission Operator function sign the NERC Confidentiality Agreement?**

Yes

No

Neutral

Comments:

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

Reliability Authorities

Balancing Authorities

Interchange Authorities

Transmission Operators

Transmission Service Providers

Comments:

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

Yes

No

Comments:

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

Yes

No

Comments:

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

Regional Difference:

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

Comments:

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

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

Check all that apply

Periodic

Significant change in footprint, corporate organization, or operation

Repetitive Non-Compliance with Reliability Standards

Flagrant violation of Reliability Standards

**Comments:**

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

**Questions 1-7 address the proposed Process for certifying Transmission Operator**

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

Yes  
 No  
 Neutral

Comments:

**2. Who should certify the Transmission Operator?**

Region  
 NERC  
 RTO  
 Independent Team

Comments:

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

In the certification process we expect to use questionnaires to collect much of the data. An area of concern is with the number of questionnaires that could be required. We will have several entities applying for certification at one time, and each entity may apply for more than one type of certification. We need some guidance on a fair method of determining how many questionnaires are needed.

**3. When we are certifying the Transmission Operator, please indicate how many of the Adjacent Transmission Operators should complete a questionnaire:**

- All
- Some fair percentage

Suggestions on how to determine a fair percentage: 0% - Do not feel that it is necessary to question adjacent Transmission Operators as part of the certification process.

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

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

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

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

- Yes
- No

**Comments:**

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

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

- Yes  
 No

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

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

- Yes  
 No

Comments:

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

- Yes  
 No

Comments:

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

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

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

- Each applicable Reliability Authority  
 Each applicable Transmission Service Provider  
 Each applicable Distribution Provider

Comments:

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

Comments: You mean Transission Operator? None come to mind.

**10. Do you think there is a need to have the entity performing the Transmission Operator function sign the NERC Confidentiality Agreement?**

- Yes
- No
- Neutral

Comments:

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

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

Comments:

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

- Yes
- No

Comments:

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

Yes

No

Comments:

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

Regional Difference:

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

Comments:

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

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

Check all that apply

Periodic

Significant change in footprint, corporate organization, or operation

Repetitive Non-Compliance with Reliability Standards

Flagrant violation of Reliability Standards

**Comments:**

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

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

**Questions 1-7 address the proposed Process for certifying Transmission Operator**

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

- Yes  
 No  
 Neutral

Comments: If Transmission Operators are certified why not certify Generators?

**2. Who should certify the Transmission Operator?**

- Region  
 NERC  
 RTO  
 Independent Team

Comments:

## **SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

In the certification process we expect to use questionnaires to collect much of the data. An area of concern is with the number of questionnaires that could be required. We will have several entities applying for certification at one time, and each entity may apply for more than one type of certification. We need some guidance on a fair method of determining how many questionnaires are needed.

**3. When we are certifying the Transmission Operator, please indicate how many of the Adjacent Transmission Operators should complete a questionnaire:**

All

Some fair percentage

Suggestions on how to determine a fair percentage:

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

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

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

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

Yes

No

**Comments: Independent team guided by NERC would be the best combination**

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

Yes

No

Comments: See previous

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

Yes

No

Comments: There is a lot of specific criteria identified that appears to be based on existing standards. Would it be better for the criteria to be identified in future standards.

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

Yes

No

Comments:

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

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

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

Each applicable Reliability Authority

Each applicable Transmission Service Provider

Each applicable Distribution Provider

Comments: Will probably need agreements with generators to provide voltage support

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

Comments: see above (Should this say TO instead of BA)

**10. Do you think there is a need to have the entity performing the Transmission Operator function sign the NERC Confidentiality Agreement?**

- Yes
- No
- Neutral

Comments:

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

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

Comments: I think so, what is in the confidentiality agreement

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

- Yes
- No

Comments: See question 6

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

Yes

No

Comments:

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

Regional Difference:

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

Comments:

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

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

Check all that apply

Periodic

Significant change in footprint, corporate organization, or operation

Repetitive Non-Compliance with Reliability Standards

Flagrant violation of Reliability Standards

**Comments:**Major industry changes

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

**Questions 1-7 address the proposed Process for certifying Transmission Operator**

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

Yes  
 No  
 Neutral

Comments:

**2. Who should certify the Transmission Operator?**

Region  
 NERC  
 RTO  
 Independent Team

Comments:

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

In the certification process we expect to use questionnaires to collect much of the data. An area of concern is with the number of questionnaires that could be required. We will have several entities applying for certification at one time, and each entity may apply for more than one type of certification. We need some guidance on a fair method of determining how many questionnaires are needed.

**3. When we are certifying the Transmission Operator, please indicate how many of the Adjacent Transmission Operators should complete a questionnaire:**

- All
- Some fair percentage

Suggestions on how to determine a fair percentage: Randomly select a statistically valid sample of the adjacent TO's to complete the questionnaire.

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

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

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

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

- Yes
- No

**Comments:**

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

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

- Yes  
 No

Comments: Don't think its necessary to have a NERC staff peron assigned to each review team, but would not be opposed to it. A NERC staff person could bring useful insight from other regions to the process.

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

- Yes  
 No

Comments:

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

- Yes  
 No

Comments: Need to include language to cover the possibility of multiple region involvement. Step 15 could be modified to note that the Review Team's report will be provided to all of the regions involved (not just the lead region). Step 16 could be modified to note that each region (not just the lead region) must accept the Review Team's recommendation for certification. Also, in step 17, I think clarity should be provided as to what time period NERC has to determine a start date for the approved Applicant and the criteria that will be used to make said determination.

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

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

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

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

- Each applicable Reliability Authority
- Each applicable Transmission Service Provider
- Each applicable Distribution Provider

Comments: I concur that responsibilities and authority amongst the RA, TSP and DP must be defined. However, not sure that additional agreements are necessary. This may be covered by existing service agreements and in the case of the RA inherent to being certified.

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

Comments: None

### 10. Do you think there is a need to have the entity performing the Transmission Operator function sign the NERC Confidentiality Agreement?

- Yes
- No
- Neutral

Comments: If the TO is going to have access to market data, then it should be subject to NERC Confidentiality Agreement

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

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

Comments: Any entity that has access to information used to maintain the operational security of the bulk electric system should be required to sign a confidentiality agreement. However, in some cases this may be covered by the code of conduct applicable to the entities involved.

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

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

---

Yes

No

Comments:

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

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

Yes

No

Comments:

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

Regional Difference:

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

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

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

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

Check all that apply

Periodic

Significant change in footprint, corporate organization, or operation

Repetitive Non-Compliance with Reliability Standards

Flagrant violation of Reliability Standards

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

## FRCC OC COMMENT 1/8/03

### SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

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

**Questions 1-7 address the proposed Process for certifying Transmission Operator**

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

Yes  
 No  
 Neutral

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

**2. Who should certify the Transmission Operator?**

Region  
 NERC  
 RTO  
 Independent Team

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

## FRCC OC COMMENT 1/8/03

### SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

In the certification process we expect to use questionnaires to collect much of the data. An area of concern is with the number of questionnaires that could be required. We will have several entities applying for certification at one time, and each entity may apply for more than one type of certification. We need some guidance on a fair method of determining how many questionnaires are needed.

**3. When we are certifying the Transmission Operator, please indicate how many of the Adjacent Transmission Operators should complete a questionnaire:**

- All  
 Some fair percentage

Suggestions on how to determine a fair percentage: In selecting All, we are under the assumption that adjacent means interconnected. Since actions of the TOp's could impact each other, all interconnected transmission system operators should participate in this process.

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

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

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

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

- Yes  
 No

**Comments:** Since transmission operators can direct Distribution providers to interrupt customers, should a distribution provider be one of the categories? Also, a representative from

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

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

Regional staff should also be included.

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

- Yes  
 No

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

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

- Yes  
 No

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

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

- Yes  
 No

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

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

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

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

- Each applicable Reliability Authority
- Each applicable Transmission Service Provider
- Each applicable Distribution Provider

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

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

Comments: You mean the transmission operator..and as stated above, the FRCC is not sure that any agreements are necessary.

**10. Do you think there is a need to have the entity performing the Transmission Operator function sign the NERC Confidentiality Agreement?**

- Yes
- No
- Neutral

Comments: Anyone providing a reliability function with access to commercially sensitive information should be required to sign a confidentiality agreement. A region may also have a separate confidentiality agreement in addition to the NERC agreement. However; is this more of a commercial issue and should it be considered by NAESB rather than NERC?

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

- Reliability Authorities
- Balancing Authorities
- Interchange Authorities

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

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

Transmission Operators

Transmission Service Providers

Comments: The other entities identified in this question should be addressed through their own respective SAR.

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

Yes

No

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

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

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

Yes

No

Comments: In the definition of the TOp function, the TOp should monitor, assess AND MAINTAIN local reliability. Also, the TOp may be performing switching needed for their own local system, not just in support of (or approved by) the RA as long as it does not negatively impact the grid. Also, there are no requirements listed for communication tools or systems, especially between the TOp and the RA.

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

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

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

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

Comments: The process for certification should be removed completely.

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

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

Check all that apply

Periodic

Significant change in footprint, corporate organization, or operation

Repetitive Non-Compliance with Reliability Standards

Flagrant violation of Reliability Standards

**Comments:** FRCC does not believe a re-certification process is necessary. The TOp will be monitored through the compliance measures included in the standard. A separate re-certification process is an unnecessary and costly make-work effort. Having said that, we do believe that a process for de-certification should be developed to address repetitive non-compliance or flagrant

## FRCC OC COMMENT 1/8/03

### SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

violation of reliability standards.

The following is a list of the FRCC OC members and guests that submit this comment form. This comment form was approved by all OC members on 1/8/03. The SAR drafting team or requester should consider this in weighting the comments submitted.

#### **Transmission Owners**

Chuck Harper, Progress Energy – Florida  
Eric Grant – Progress Energy – Florida  
Bill Slater – Progress Energy - Florida  
Marty Mennes – Florida Power & Light Company  
Beth Young – Tampa Electric Company  
Jose Quintas – Tampa Electric Company

#### **Load Serving Entity**

Mark Bennett – Gainesville Regional Utilities  
Ted Hobson – JEA  
Richard Gilbert – Lakeland Electric  
Paul Shipps – Lakeland Electric  
Tom Calabro – Orlando Utilities Commission  
Rusty Foster – City of Tallahassee  
Robert Miller – Kissimmee Utility Authority  
Greg Woessner – Kissimmee Utility Authority  
Bob Remley – Clay Electric Cooperative  
Steve Treece – Ft. Pierce Utilities Authority  
Joe Roos – Ocala Electric Utility  
Tim Beyrle – Utilities Commission of New Smyrna Beach  
John Giddens – Reedy Creek Improvement District

#### **Generator**

Gary Jackson – Calpine Corporation  
Douglas Bullock – Indiantown Cogeneration, L.P.  
John Twitchell – Mirant Corporation  
Mike Antonell – Reliant Energy Services

#### **Transmission Dependent Utilities**

Steve Wallace – Seminole Electric Cooperative  
Joe Welborn – Seminole Electric Cooperative

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

<b>SAR Commenter Information</b>		<b>Which Industry Segment do you represent?</b>	
Name	Ken Githens	<input type="checkbox"/> Trans Owners	<input type="checkbox"/> <b>Brokers, Aggregators, and Marketers</b>
Organization	Allegheny Energy Supply	<input type="checkbox"/> RTOs, ISOs, RRCs	<input type="checkbox"/> Large Electricity End Users
Telephone	412-858-1635	<input type="checkbox"/> LSEs	<input type="checkbox"/> Small Electricity Users
E-mail com	kgithen@alleghenyenergy.com	<input type="checkbox"/> TDUs	<input type="checkbox"/> <b>Federal, State, and Provincial Regulatory or other Government Entities</b>
		<input checked="" type="checkbox"/> Generators	

**Questions 1-7 address the proposed Process for certifying Transmission Operator**

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

Yes  
 No  
 Neutral

Comments: But, the certification process should not be a standard. The certification process could be covered by a business procedure.

**2. Who should certify the Transmission Operator?**

Region  
 NERC  
 RTO  
 Independent Team

Comments: The independent team should be composed of representatives from NERC, NAESB, and possibly RTO/ISO's. Certifying entities need to certify not only reliability standards but also the associated market/commercial standards. All certifications would be completed at the same time.

## **SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

In the certification process we expect to use questionnaires to collect much of the data. An area of concern is with the number of questionnaires that could be required. We will have several entities applying for certification at one time, and each entity may apply for more than one type of certification. We need some guidance on a fair method of determining how many questionnaires are needed.

**3. When we are certifying the Transmission Operator, please indicate how many of the Adjacent Transmission Operators should complete a questionnaire:**

All

Some fair percentage

Suggestions on how to determine a fair percentage:

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

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

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

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

Yes

No

**Comments: See comment for question 3.**

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

- Yes  
 No

Comments:

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

- Yes  
 No

Comments:

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

- Yes  
 No

Comments:

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

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

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

- Each applicable Reliability Authority  
 Each applicable Transmission Service Provider  
 Each applicable Distribution Provider

Comments:

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

Comments:

**10. Do you think there is a need to have the entity performing the Transmission Operator function sign the NERC Confidentiality Agreement?**

Yes

No

Neutral

Comments:

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

Reliability Authorities

Balancing Authorities

Interchange Authorities

Transmission Operators

Transmission Service Providers

Comments:

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

Yes

No

Comments:

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

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

Yes

No

Comments:

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

Regional Difference:

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

Comments: Any certification team member should not be an employee of the organization being certified.

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

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

Check all that apply

Periodic

Significant change in footprint, corporate organization, or operation

Repetitive Non-Compliance with Reliability Standards

Flagrant violation of Reliability Standards

**Comments:** Periodic recertification time intervals should be extended if other items are included.

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

<b>SAR Commenter Information</b>	<b>Which Industry Segment do you represent?</b>
Name            Ed Groce	<input type="checkbox"/> Trans Owners <input type="checkbox"/> <b>Brokers, Aggregators, and Marketers</b>
Organization    Avista Utilities	<input type="checkbox"/> RTOs, ISOs, RRCs <input type="checkbox"/> Large Electricity End Users
Telephone        509-495-4164	<input type="checkbox"/> LSEs <input type="checkbox"/> Small Electricity Users
E-mail            ed.groce@avistacorp.com	<input type="checkbox"/> TDUs <input type="checkbox"/> <b>Federal, State, and Provincial Regulatory or other Government Entities</b>
	<input checked="" type="checkbox"/> Generators

**Questions 1-7 address the proposed Process for certifying Transmission Operator**

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

Yes  
 No  
 Neutral

Comments:

**2. Who should certify the Transmission Operator?**

Region  
 NERC  
 RTO  
 Independent Team

Comments:

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

In the certification process we expect to use questionnaires to collect much of the data. An area of concern is with the number of questionnaires that could be required. We will have several entities applying for certification at one time, and each entity may apply for more than one type of certification. We need some guidance on a fair method of determining how many questionnaires are needed.

**3. When we are certifying the Transmission Operator, please indicate how many of the Adjacent Transmission Operators should complete a questionnaire:**

- All
- Some fair percentage

Suggestions on how to determine a fair percentage: 50% not to exceed 6

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

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

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

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

- Yes
- No

**Comments:**

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

Yes

No

Comments:

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

Yes

No

Comments:

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

Yes

No

Comments:

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

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

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

Each applicable Reliability Authority

Each applicable Transmission Service Provider

Each applicable Distribution Provider

Comments:

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

Comments: Need to change your survey question to reflect Trans Operator

**10. Do you think there is a need to have the entity performing the Transmission Operator function sign the NERC Confidentiality Agreement?**

- Yes
- No
- Neutral

Comments:

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

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

Comments:

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

- Yes
- No

Comments:

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

Yes

No

Comments:

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

Regional Difference:

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

Comments:

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

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

Check all that apply

Periodic

Significant change in footprint, corporate organization, or operation

Repetitive Non-Compliance with Reliability Standards

Flagrant violation of Reliability Standards

**Comments:**

## **SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

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

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

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

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

### **Background**

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

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

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

Certification Criteria are those requirements that an entity must meet to be “Certified” by NERC or another certifying entity such as one of the NERC Regions. NERC Certification is an indication that an organization has the resources in place and the ability to perform a reliability function, such as a Balancing Authority, Interchange Authority, etc. Entities that attain their Certification status must comply with applicable NERC Reliability Standards and criteria.

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

<b>SAR Commenter Information</b>	<b>Which Industry Segment do you represent?</b>	
Name            Thomas J. Vandervort, Transmission Subcommittee Secretary	<input type="checkbox"/> Trans Owners	<input type="checkbox"/> <b>Brokers, Aggregators, and Marketers</b>
Organization    Transmission Subcommitt	<input type="checkbox"/> RTOs, ISOs, RRCs	<input type="checkbox"/> Large Electricity End Users
Telephone        609 452-8060	<input checked="" type="checkbox"/> LSEs	<input type="checkbox"/> Small Electricity Users
E-mail            tom.vandervort@nerc.net	<input type="checkbox"/> TDUs	<input type="checkbox"/> <b>Federal, State, and Provincial Regulatory or other Government Entities</b>
	<input checked="" type="checkbox"/> Generators	

**Questions 1-7 address the proposed Process for certifying Transmission Operator**

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

Yes  
 No  
 Neutral

Comments: 4 - Yes, 0 - No, 1 - Neutral;

Comment: (1) I do agree some such standard is needed. However, the SAR needs to make the case for this, and it fails to do so adequately. The Purpose/Industry Need Section is too weak; this section needs to contain a summary of the reasons such certification are needed - it needs to contain the goals that are achieved by such certification. If a person picked up the SAR thinking that there was no such need, the SAR, as presently written, does little to change their mind.

(2) The Purpose/Industry Need, as written, appears to be inappropriate. It appears to give an option to those entities that "want to be recognized as a Transmission Operator." It should state that this standard is the certification requirement required to perform Transmission Operator functions.

**2. Who should certify the Transmission Operator?**

Region  
 NERC  
 RTO  
 Independent Team

Comments: 2 - Region, 3 - NERC, 0 - RTO, 2 - Independent Team. No Comments

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

In the certification process we expect to use questionnaires to collect much of the data. An area of concern is with the number of questionnaires that could be required. We will have several entities applying for certification at one time, and each entity may apply for more than one type of certification. We need some guidance on a fair method of determining how many questionnaires are needed.

### 3. When we are certifying the Transmission Operator, please indicate how many of the Adjacent Transmission Operators should complete a questionnaire:

- All
- Some fair percentage

Suggestions on how to determine a fair percentage: 1 - All, 2 - Some Fair Percentage

Comments: (1) "Some Fair Percentage" - At least 4 adjacent Transmission Operators should complete a questionnaire. If there are 4 or less than all should complete a questionnaire. If there are 5 or more, then either 4 or 50% should complete a questionnaire, whichever is greater.

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

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

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

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

- Yes
- No

Comments: 3 - Yes, 0 - No

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

Comments: (1) Why is there an alternative? I don't see a need for a team consisting of members outside the ones listed.

(2) There should always be a Reliability Authority involved/included in the Review Team.

(3) This appears to be a confusing question. The list does appear to be satisfactory, which answers the stated question. However, a second question should be asked about the acceptability of the "alternative Review Team." The concept of an "alternative Review Team" made up of a completely independent team contradicts the question.

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

Yes

No

Comments: 2 - Yes, 2 - No

Comments: (1) A regional person may be sufficient.

(2) A person that represents the entity responsible for regional compliance should be assigned to each review team. NERC staff is not necessary.

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

Yes

No

Comments: 1 - Yes, 2 - No

Comments: (1) Is it necessary to make changes to the IDC?

(2) The structure of the SAR should be a general high level overview of the final standard. This allows the Standard Drafting Team to complete the document. The present SAR, as written, will proverbially "tie the hands" of the Standard Drafting Team and restrict their window of opportunity to create the standard.

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

Yes

No

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

Comments: 0 - Yes, 3 - No, no comments

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

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

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

- Each applicable Reliability Authority
- Each applicable Transmission Service Provider
- Each applicable Distribution Provider

Comments: 3 - Each applicable RA, 3 - Each applicable TSP, 2 - Each applicable DP, No Comments

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

Comments: No Comments

### 10. Do you think there is a need to have the entity performing the Transmission Operator function sign the NERC Confidentiality Agreement?

- Yes
- No
- Neutral

Comments: 2 - Yes, 0 - No, 1 - Neutral, No Comments

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

- Reliability Authorities
- Balancing Authorities
- Interchange Authorities

## **SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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Transmission Operators

Transmission Service Providers

Comments: 3 - RA, 1 - BA, 2 - IA, 2 - TOP, 1 - TSP, No Comments

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

Yes

No

Comments: 1 - Yes, 2 - No,

Comments: (1) The majority of what is written should not be included in the "SAR" phase of the standards process. The SAR should be high level generalities with Standard Drafting Team completing the detailed document.

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

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

Yes

No

Comments: 0 - Yes, 3 - No, No Comments

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

Regional Difference: No Regional Differences noted

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

Comments: (1) My biggest concern about this SAR is that I believe much of the language should not be "adopted" at the SAR stage, and some important aspects that should be delineated at the SAR stage are not yet. According to the NERC Reliability Standards Process Manual (see page 11 of the June 14 version), the public posting of the SAR is "to allow the parties to review and provide comments on the need for the proposed standard and the expected outcomes and impacts from implementing the proposed standard." Unfortunately, the case about what this standard is needed for isn't really presented in the SAR. The SAR needs to contain detail about the reliability benefits/requirements that are behind the need for the SAR. This stage is the time to answer big picture questions and present a compelling reason to go forward, not the stage to spell out a lot of detail about what Certification Criteria should be - that stuff should be developed by the Standard drafting team. Most of the detail under the "Transmission Operator Certification Process" and "Transmission Operator Criteria" Sections should not be approved at the SAR stage of the process. If there is a feeling that it should be presented to the industry just for the reason of giving more background, it should be put in section delineated as background and it should be clarified that this stuff could indeed be changed during the Standards development phase.

In addition to including too much, there has also been stuff left out that needs to be clarified to achieve the stated aim of the SAR phase of establishing the expected outcomes and impacts. Examples include: Are existing entities subject to these certification requirements? What is the expectation if an entity "fails" certification, and how might those expectations be different for an existing entity or a new entity? What happens if an entity decides it doesn't "want to be recognized as a Transmission Operator"? Will there be a waiver process for any entities, such as small ones - do only those that "affect bulk reliability" fall under these requirements?

(2) The SAR, if accepted as written, will restrict the Standard Drafting Team from the choice of wording, language and expanding the requirements.

**Procedures currently exist for re-certification of control areas. Considerations are being**

**given for inclusion of re -certification in the certification standards.**

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

Check all that apply

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

**Comments:** 3 - Periodic, 2 - Significant change in footprint, corporate organization, or operation, 2 - Repetitive Non-Compliance with Reliability Standards, 2 - Flagrant violation of Reliability Standards

Comments: (1) Given that there is a compelling reliability need for certification, any of these events would necessarily result in the need to assure continued alignment with achieving those reliability goals. I would fear that a periodic requirement would be too burdensome without compelling need.

This should definitely be sorted out prior to this SAR moving to the Standards drafting process. These key concepts about how this is to be administered need to be focused on instead of all detail currently given under "Transmission Operator Criteria," much of which should really wait until the Standard Drafting phase.

## **SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

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

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

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

### **Background**

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

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

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

Certification Criteria are those requirements that an entity must meet to be “Certified” by NERC or another certifying entity such as one of the NERC Regions. NERC Certification is an indication that an organization has the resources in place and the ability to perform a reliability function, such as a Balancing Authority, Interchange Authority, etc. Entities that attain their Certification status must comply with applicable NERC Reliability Standards and criteria.

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

<b>SAR Commenter Information</b>	<b>Which Industry Segment do you represent?</b>
Name            Ray Gross	<input type="checkbox"/> Trans Owners <input type="checkbox"/> <b>Brokers, Aggregators, and Marketers</b>
Organization    PJM Interconnection, LLC	<input checked="" type="checkbox"/> RTOs, ISOs, RRCs <input type="checkbox"/> Large Electricity End Users
Telephone        610-666-8890	<input type="checkbox"/> LSEs <input type="checkbox"/> Small Electricity Users
E-mail            grossrc@pjm.com	<input type="checkbox"/> TDUs <input type="checkbox"/> <b>Federal, State, and Provincial Regulatory or other Government Entities</b>
	<input type="checkbox"/> Generators

**Questions 1-7 address the proposed Process for certifying Transmission Operator**

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

Yes  
 No  
 Neutral

Comments:

**2. Who should certify the Transmission Operator?**

Region  
 NERC  
 RTO  
 Independent Team

Comments: Transmission Operator entities operating at the direction of an RTO need to be certified by the RTO, all other Transmission Operator entities can be certified by NERC and/or the Region(s) within which they operate.

System operators employed by a Transmission Operator entity and directly responsible for conforming with NERC policies need to be NERC certified. System operators employed by entities which operate at the direction of an RTO need to be certified by that RTO.

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

In the certification process we expect to use questionnaires to collect much of the data. An area of concern is with the number of questionnaires that could be required. We will have several entities applying for certification at one time, and each entity may apply for more than one type of certification. We need some guidance on a fair method of determining how many questionnaires are needed.

**3. When we are certifying the Transmission Operator, please indicate how many of the Adjacent Transmission Operators should complete a questionnaire:**

All

Some fair percentage

Suggestions on how to determine a fair percentage:

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

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

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

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

Yes

No

**Comments:**

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

- Yes  
 No

Comments:

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

- Yes  
 No

Comments:

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

- Yes  
 No

Comments:

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

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

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

- Each applicable Reliability Authority  
 Each applicable Transmission Service Provider  
 Each applicable Distribution Provider

Comments:

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

Comments:

**10. Do you think there is a need to have the entity performing the Transmission Operator function sign the NERC Confidentiality Agreement?**

- Yes
- No
- Neutral

Comments:

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

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

Comments:

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

- Yes
- No

Comments:

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

Yes

No

Comments:

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

Regional Difference:

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

Comments:

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

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

Check all that apply

Periodic

Significant change in footprint, corporate organization, or operation

Repetitive Non-Compliance with Reliability Standards

Flagrant violation of Reliability Standards

**Comments:**

## **SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

<b>SAR Commenter Information</b>	<b>Which Industry Segment do you represent?</b>
Name            Tony Jankowski	<input type="checkbox"/> Trans Owners <input type="checkbox"/> <b>Brokers, Aggregators, and Marketers</b>
Organization    Wisconsin Electric Power Co (We Energies)	<input type="checkbox"/> RTOs, ISOs, RRCs <input type="checkbox"/> Large Electricity End Users
Telephone        262-673-9607	<input checked="" type="checkbox"/> LSEs <input type="checkbox"/> Small Electricity Users
E-mail            tony.jankowski@we-energies.com	<input checked="" type="checkbox"/> TDUs <input type="checkbox"/> <b>Federal, State, and Provincial Regulatory or other Government Entities</b>
	<input checked="" type="checkbox"/> Generators

**Questions 1-7 address the proposed Process for certifying Transmission Operator**

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

- Yes  
 No  
 Neutral

Comments: Should also include clarification on how the area of responsibility of the TOP is defined.

**2. Who should certify the Transmission Operator?**

- Region  
 NERC  
 RTO  
 Independent Team

Comments: Only NERC should certify. There are already enough conflicting rules between Regions without adding a certifying authority that may have new rule conflicts between Regions.

As a minimum, NERC should perform the generic certification. Also, because very unique operational concerns can exist in specific regions, it may be reasonable to enable an additional regional certification (or NERC sub-certification).

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

In the certification process we expect to use questionnaires to collect much of the data. An area of concern is with the number of questionnaires that could be required. We will have several entities applying for certification at one time, and each entity may apply for more than one type of certification. We need some guidance on a fair method of determining how many questionnaires are needed.

**3. When we are certifying the Transmission Operator, please indicate how many of the Adjacent Transmission Operators should complete a questionnaire:**

All

Some fair percentage

Suggestions on how to determine a fair percentage: Questionnaires should be sent to all affected parties -- including the TOP's, RA and all BA's.

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

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

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

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

Yes

No

Comments: Any list should also require that those members of the certification team be knowledgeable in the relevant functions that would be performed by the TOP requesting certification, and at least one member of the team should be NERC certified as a TOP. The certification process should clearly define what constitutes consensus. The review team must be composed of representatives of members from each applicable type of authority and function that is immediately and directly affected by the activities and functions of the organization being

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

certified.

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

Yes

No

Comments: The staff person should be from the NERC Compliance department and be familiar with the certification process and the requirements of the TOP function. It would help ensure that a consistent methodology is applied to the certification process.

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

Yes

No

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

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

The process assumes that the IDC continues to exist. This should be removed.

On page SAR-2 under Transmission Operator Certification Process #3, we feel the timeframe for completion listed at nine months is excessive. A three to six month timeframe would be preferred. The entity making the application deserves to have a resolution in a timely manner. A nine month waiting period is unreasonable.

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

Yes

No

Comments: There is not a provision for review of certification criteria and requirements by organization that would be interacting with the TOP. This should be part of the initial questionnaire.

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

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

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

- Each applicable Reliability Authority
- Each applicable Transmission Service Provider
- Each applicable Distribution Provider

The boundary of responsibility should be conducted through a registration process facilitated by NERC: The Transmission Owner designates its Transmission Operator, which may be itself, and each Transmission Operator designates its Reliability Authority.

This registration conveys the expectation that the operator and TOP will comply with NERC standards and has the responsibility to carry out good utility practice.

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

Comments: The TOP should have agreements in place that support the concept of the "Coordinate Operations" standard with boundary connected authorities and operators.

**10. Do you think there is a need to have the entity performing the Transmission Operator function sign the NERC Confidentiality Agreement?**

- Yes
- No
- Neutral

Comments: The TOP should sign the NERC Confidentiality Agreement.

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

- Reliability Authorities
- Balancing Authorities
- Interchange Authorities

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

Transmission Operators

Transmission Service Providers

Comments: Relative to certifying TOP's, the status of the other groups' signing is irrelevant. The TOP should be required to sign at least a NERC confidentiality agreement.

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

Yes

No

Comments: The certification criteria and requirements contained in the standard need to be more specific and contain what constitutes failure to meet.

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

Yes

No

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

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

Need to clearly state that "All" listed criteria and requirements must be met – no exceptions.

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

Regional Difference: None – All organization certifications need to be consistent.

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

Comments: Throughout the text the SAR implies that the Region has authority for conducting

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

the certification process, up to and including dispute resolution. This conflicts with your questions asking who should conduct the certification and the concept of NERC as the Certification Authority.

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

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

Check all that apply

- Periodic 3 – 5 years
- Significant change in area of responsibility, corporate organization, or operation
- Repetitive Non-Compliance with Reliability Standards
- Flagrant violation of Reliability Standards

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

## **SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

<b>SAR Commenter Information</b>		<b>Which Industry Segment do you represent?</b>	
Name	Jim S. Griffith	<input checked="" type="checkbox"/> Trans Owners	<input type="checkbox"/> <b>Brokers, Aggregators, and Marketers</b>
Organization	Southern Company	<input type="checkbox"/> RTOs, ISOs, RRCs	<input type="checkbox"/> Large Electricity End Users
Telephone	205-257-6892	<input type="checkbox"/> LSEs	<input type="checkbox"/> Small Electricity Users
E-mail	jsgriffi@southernco.com	<input type="checkbox"/> TDUs	<input type="checkbox"/> <b>Federal, State, and Provincial Regulatory or other Government Entities</b>
		<input type="checkbox"/> Generators	

**Questions 1-7 address the proposed Process for certifying Transmission Operator**

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

Yes  
 No  
 Neutral

Comments: This function performs reliability operation functions which will require certification.

**2. Who should certify the Transmission Operator?**

Region  
 NERC  
 RTO  
 Independent Team

Comments: If the RTO is in place, it should be involved in this process.

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

In the certification process we expect to use questionnaires to collect much of the data. An area of concern is with the number of questionnaires that could be required. We will have several entities applying for certification at one time, and each entity may apply for more than one type of certification. We need some guidance on a fair method of determining how many questionnaires are needed.

**3. When we are certifying the Transmission Operator, please indicate how many of the Adjacent Transmission Operators should complete a questionnaire:**

- All  
 Some fair percentage

Suggestions on how to determine a fair percentage: All must be included.

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

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

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

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

- Yes  
 No

**Comments:**

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

Yes

No

Comments:

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

Yes

No

Comments:

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

Yes

No

Comments: Changes in the certification requirements should be addressed.

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

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

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

Each applicable Reliability Authority

Each applicable Transmission Service Provider

Each applicable Distribution Provider

Comments: The balancing authority should be included in the agreements required.

## **SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

Comments: The should be changed to say "Interchange Authority" instead of Balancing Authority.

### **10. Do you think there is a need to have the entity performing the Transmission Operator function sign the NERC Confidentiality Agreement?**

- Yes
- No
- Neutral

Comments:

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

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

Comments:

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

- Yes
- No

Comments:

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

Yes

No

Comments:

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

Regional Difference:

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

Comments:

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

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

Check all that apply

Periodic

Significant change in footprint, corporate organization, or operation

Repetitive Non-Compliance with Reliability Standards

Flagrant violation of Reliability Standards

**Comments:**

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

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

### **Background**

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

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

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

Certification Criteria are those requirements that an entity must meet to be “Certified” by NERC or another certifying entity such as one of the NERC Regions. NERC Certification is an indication that an organization has the resources in place and the ability to perform a reliability function, such as a Balancing Authority, Interchange Authority, etc. Entities that attain their Certification status must comply with applicable NERC Reliability Standards and criteria.

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

<b>SAR Commenter Information</b>		<b>Which Industry Segment do you represent?</b>	
Name	Michael Desselle	<input checked="" type="checkbox"/> Trans Owners	<input type="checkbox"/> <b>Brokers, Aggregators, and Marketers</b>
Organization	American Electric Power	<input type="checkbox"/> RTOs, ISOs, RRCs	<input type="checkbox"/> Large Electricity End Users
Telephone	215-777-1826	<input type="checkbox"/> LSEs	<input type="checkbox"/> Small Electricity Users
E-mail	mddesselle@aep.com	<input type="checkbox"/> TDUs	<input type="checkbox"/> <b>Federal, State, and Provincial Regulatory or other Government Entities</b>
		<input type="checkbox"/> Generators	

**Questions 1-7 address the proposed Process for certifying Transmission Operator**

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

Yes  
 No  
 Neutral

Comments: We agree that TOPs should be staffed with NERC Certified operators (with exception to new TOP employees who are in the process of becoming certified and who are supervised by a Certified NERC operator) and that they should be subject to performance audits and penalties for non-compliance to NERC standards. The key entities that need up-front certification are the functional model authorities: 1) the Reliability Authority 2) the Balance Authority and 3) the Interchange Authority. The authorities are the key to tying everything together. We do not believe the operating functions (per the NERC model they are the Generator, Purchasing-Selling Entity, Load-Serving Entity, Transmission Owner, and Transmission Operator) need certification. They need performance auditing with appropriate penalties to ensure they operate within the NERC/NAESB standards. Even the RTOs and ISOs do not need certification, because, they will be reviewed and certified based upon the NERC authority functions they perform (i.e. Balance Authority, Interchange Authority, and/or Reliability Authority functions). We fully support the recommendations of the NERC CACTF which developed the NERC Functional Model. They recommended:

1. The CACTF believes that system operators who perform the Reliability Authority, Balancing Authority, Interchange Authority, and Transmission Operator functions are responsible for the real-time operation of the Bulk Electric System and comprise the set of "Operating Authorities" whose personnel should be certified by NERC.

2. The CACTF also recommends that those organizations that provide the Reliability Authority, Balancing Authority, and Interchange Authority functions be certified by the Regional Reliability Organization (or NERC) just as Control Areas are today. Furthermore, because the Transmission Service Provider's role in accurately calculating Available Transfer Capability is

## **SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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critical to ensuring operating reliability and minimizing congestion, the Task Force also believes that the organization serving as the TSP function should be certified.

Therefore, we do not believe it appropriate to require a certification procedure for the Transmission Operator. Accordingly, we have not commented on the rest of this SAR.

### **2. Who should certify the Transmission Operator?**

- Region
- NERC
- RTO
- Independent Team

Comments: see comments to no. 1 above

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

In the certification process we expect to use questionnaires to collect much of the data. An area of concern is with the number of questionnaires that could be required. We will have several entities applying for certification at one time, and each entity may apply for more than one type of certification. We need some guidance on a fair method of determining how many questionnaires are needed.

**3. When we are certifying the Transmission Operator, please indicate how many of the Adjacent Transmission Operators should complete a questionnaire:**

- All
- Some fair percentage

Suggestions on how to determine a fair percentage:

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

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

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

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

- Yes
- No

**Comments: see comments to no. 1 above**

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

- Yes  
 No

Comments: see comments to no. 1 above

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

- Yes  
 No

Comments: see comments to no. 1 above

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

- Yes  
 No

Comments: see comments to no. 1 above

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

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

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

- Each applicable Reliability Authority  
 Each applicable Transmission Service Provider  
 Each applicable Distribution Provider

Comments:

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

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

Comments: see comments to no. 1 above

### 10. Do you think there is a need to have the entity performing the Transmission Operator function sign the NERC Confidentiality Agreement?

- Yes
- No
- Neutral

Comments:

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

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

Comments:

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

- Yes
- No

Comments: See comments to no. 1 above

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

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

Yes

No

Comments:

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

Regional Difference: Standards should be agreed upon by NERC/NAESB to settle regional differences.

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

Comments:

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

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

Check all that apply

Periodic

Significant change in footprint, corporate organization, or operation

Repetitive Non-Compliance with Reliability Standards

Flagrant violation of Reliability Standards

**Comments:** see comments for no. 1 above

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### **Background**

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

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

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

Certification Criteria are those requirements that an entity must meet to be “Certified” by NERC or another certifying entity such as one of the NERC Regions. NERC Certification is an indication that an organization has the resources in place and the ability to perform a reliability function, such as a Balancing Authority, Interchange Authority, etc. Entities that attain their Certification status must comply with applicable NERC Reliability Standards and criteria.

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

SAR Commenter Information		Which Industry Segment do you represent?	
Name	Carter B. Edge	<input type="checkbox"/> Trans Owners	<input type="checkbox"/> Brokers, Aggregators, and Marketers
Organization	Southeastern Power Administration	<input type="checkbox"/> RTOs, ISOs, RRCs	<input type="checkbox"/> Large Electricity End Users
Telephone	706-213-3855	<input type="checkbox"/> LSEs	<input type="checkbox"/> Small Electricity Users
E-mail	cartere@sepa.doe.gov	<input checked="" type="checkbox"/> TDUs	<input type="checkbox"/> Federal, State, and Provincial Regulatory or other Government Entities
		<input checked="" type="checkbox"/> Generators	

**Questions 1-7 address the proposed Process for certifying Transmission Operator**

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

- Yes  
 No  
 Neutral

Comments: To ensure that those entities performing the Transmission Operator Function are validated.

**2. Who should certify the Transmission Operator?**

- Region  
 NERC  
 RTO  
 Independent Team

Comments: Reliability issues can be identified and more readily resolved when the Applicant is answering to one "lead" review team. The Regions should identify a process whereby concerns are resolved and uniform practices are adopted by the entity seeking certification across those regional boundaries.

In the certification process we expect to use questionnaires to collect much of the data. An area of concern is with the number of questionnaires that could be required. We will have several entities applying for certification at one time, and each entity may apply for more than one type of certification. We need some guidance on a fair method of determining how many questionnaires are needed.

**3. When we are certifying the Transmission Operator, please indicate how many of the Adjacent Transmission Operators should complete a questionnaire:**

All

Some fair percentage

Suggestions on how to determine a fair percentage: If an adjacent transmission operator has reliability concerns, they should be allowed to voice them.

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

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

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

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

Yes

No

**Comments: The Regions are best suited to certify entities. The NERC should continue to develop the Standards to which the functions operate.**

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

Yes

No

Comments: This would be unnecessary as the Regions would follow the NERC process for certification.

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

Yes

No

Comments:

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

Yes

No

Comments: It is unclear how the "agreed upon date" is derived or who agrees on it for beginning Transmission Operations in step #17.

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

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

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

Each applicable Reliability Authority

Each applicable Transmission Service Provider

Each applicable Distribution Provider

## **SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

Comments: It is still unclear what is meant by "agreements". Under the Functional Model the TOP interacts with Distribution Providers, TOP's and RA's. There should be an understanding that defines the relationship between the entities performing those functions.

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

Comments: It is still unclear what is meant by "agreements". There should be an understanding of the relationship between the entities interacting with the TOP function.

### **10. Do you think there is a need to have the entity performing the Transmission Operator function sign the NERC Confidentiality Agreement?**

- Yes
- No
- Neutral

Comments: Only those entities desiring/having access to confidential information. It should NOT be made a criteria of certification.

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

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

Comments: Only those entities desiring/having access to confidential information. It should NOT be made a criteria of certification.

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

- Yes
- No

## **SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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Comments: It is unclear what is meant by "code of conduct" in section 4 of the criteria. If this is referring to the FERC Code of Conduct it should NOT be included as a criteria of certification. There are entities performing the Transmission Operation today who are unable to bind themselves to the FERC. Please explain the rationale in having both a confidentiality agreement and code of conduct criteria.

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

Yes

No

Comments:

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

Regional Difference: none

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

Comments: Question # 9 should refer to the TOP and not the BA.

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

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

Check all that apply

Periodic

Significant change in footprint, corporate organization, or operation

Repetitive Non-Compliance with Reliability Standards

Flagrant violation of Reliability Standards

**Comments:** This seems to imply that certification is granted time-certain rather than at-will. Periodic audits should be a part of the process to ensure that the entities performing the BA function are validated.

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### **Background**

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## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

SAR Commenter Information		Which Industry Segment do you represent?	
Name	Lee A. Gladish	<input type="checkbox"/> Trans Owners	<input type="checkbox"/> <b>Brokers, Aggregators, and Marketers</b>
Organization	CWLP	<input type="checkbox"/> RTOs, ISOs, RRCs	<input type="checkbox"/> Large Electricity End Users
Telephone	217-757-8520	<input type="checkbox"/> LSEs	<input type="checkbox"/> Small Electricity Users
E-mail	lgladish@cwlp.com	<input checked="" type="checkbox"/> TDUs	<input type="checkbox"/> <b>Federal, State, and Provincial Regulatory or other Government Entities</b>
		<input type="checkbox"/> Generators	

**Questions 1-7 address the proposed Process for certifying Transmission Operator**

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

- Yes  
 No  
 Neutral

Comments: And thank you for adding this function to the organizational certification requirements.

**2. Who should certify the Transmission Operator?**

- Region  
 NERC  
 RTO  
 Independent Team

Comments: Same as comments to the RA SAR.

## **SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

In the certification process we expect to use questionnaires to collect much of the data. An area of concern is with the number of questionnaires that could be required. We will have several entities applying for certification at one time, and each entity may apply for more than one type of certification. We need some guidance on a fair method of determining how many questionnaires are needed.

### **3. When we are certifying the Transmission Operator, please indicate how many of the Adjacent Transmission Operators should complete a questionnaire:**

- All
- Some fair percentage

Suggestions on how to determine a fair percentage: For small systems, this may be only one or two. Use them all in that case. For large systems there may be dozens. Use a minimum of a small, medium, and large neighbor. May try to diversify among TDU's, Co-op's Muni's IOU's, etc., if they exist in the mix available.

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

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

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

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

- Yes**
- No**

**Comments: Same as my comments to the RA SAR.**

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

Yes

No

Comments: Same as my comments to the RA SAR.

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

Yes

No

Comments:

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

Yes

No

Comments: Same as my comments to the RA SAR.

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

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

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

Each applicable Reliability Authority

Each applicable Transmission Service Provider

Each applicable Distribution Provider

Comments:

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

Comments:

**10. Do you think there is a need to have the entity performing the Transmission Operator function sign the NERC Confidentiality Agreement?**

Yes

No

Neutral

Comments:

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

Reliability Authorities

Balancing Authorities

Interchange Authorities

Transmission Operators

Transmission Service Providers

Comments:

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

Yes

No

Comments:

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

Yes

No

Comments: Same a smy comments to the RA SAR.

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

Regional Difference:

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

Comments:

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

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

Check all that apply

Periodic

Significant change in footprint, corporate organization, or operation

Repetitive Non-Compliance with Reliability Standards

Flagrant violation of Reliability Standards

**Comments:**

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## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

SAR Commenter Information		Which Industry Segment do you represent?	
Name	Roman Carter on behalf of Tony Reed	<input type="checkbox"/> Trans Owners	<input checked="" type="checkbox"/> <b>Brokers, Aggregators, and Marketers</b>
Organization	Southern Co. Generation and Energy Marketing	<input type="checkbox"/> RTOs, ISOs, RRCs	<input type="checkbox"/> Large Electricity End Users
Telephone	205.257.6027	<input checked="" type="checkbox"/> LSEs	<input type="checkbox"/> Small Electricity Users
E-mail	jrcarter@southernco.com	<input type="checkbox"/> TDUs	<input type="checkbox"/> <b>Federal, State, and Provincial Regulatory or other Government Entities</b>
		<input checked="" type="checkbox"/> Generators	

**Questions 1-7 address the proposed Process for certifying Transmission Operator**

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

- Yes  
 No  
 Neutral

Comments:

**2. Who should certify the Transmission Operator?**

- Region  
 NERC  
 RTO  
 Independent Team

Comments: Each region should already have the fundamental structure/organization, collective expertise, reliability knowledge and experience, and representation (including a minimum of 1 merchant function entity) among its members to handle this appropriately.

In the certification process we expect to use questionnaires to collect much of the data. An area of concern is with the number of questionnaires that could be required. We will have several entities applying for certification at one time, and each entity may apply for more than one type of certification. We need some guidance on a fair method of determining how many questionnaires are needed.

**3. When we are certifying the Transmission Operator, please indicate how many of the Adjacent Transmission Operators should complete a questionnaire:**

All

Some fair percentage

Suggestions on how to determine a fair percentage:

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

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

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

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

Yes

No

**Comments: The Review Team above is heavily weighted with Reliability function entities. The review team should have representation from the Generation sector in each of the affected Regions. Actions and decisions made by the Transmission Operator could have direct and indirect impacts on the Generators.**

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

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

Yes

No

Comments: While regions are taking the lead role with the certification process, having a NERC staff person involved to help facilitate the process should help complete the process more quickly and avoid certain pitfalls..

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

Yes

No

Comments: As the standard itself is being developed, the industry may identify additional elements or details that would enhance or streamline the process. Therefore, provisions should be made in the SAR to permit enhancing or streamlining the certification process during development of the standard itself.

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

Yes

No

Comments: However, as the standard itself is being developed, the industry may identify additional elements or details that would enhance or streamline the process. Therefore, provisions should be made in the SAR to permit enhancing or streamlining the certification process during development of the standard itself.

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

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

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

- Each applicable Reliability Authority
- Each applicable Transmission Service Provider
- Each applicable Distribution Provider

Comments: It is important that the Authorities have sufficient arrangements (e.g. agreements) in place to carry out its duties and to support the other certified Authorities. However, we do not believe that agreements defining their authority is necessary in the SAR stage. We do agree that the Transmission Operator candidate should have the necessary elements prepared to initiate the agreements once certified.

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

Comments: We believe this question should state " What other agreements should be required for the Transmission Operator?" Once the Transmission Operator becomes certified, it should include agreements defining responsibilities and authority (during normal and emergency conditions) with respect to Generators. This would include nuclear plants because they not only generate power to the grid, they also rely on the grid as their preferred power source for safe shutdown equipment.

**10. Do you think there is a need to have the entity performing the Transmission Operator function sign the NERC Confidentiality Agreement?**

- Yes
- No
- Neutral

Comments:

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

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

Comments: Without knowing details of the confidentiality agreement and whether it would prevent an entity from performing other economic generator-related functions, it is unclear whether

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

a Balancing Authority should be required to sign.

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

Yes

No

Comments: Generally, the structure of a SAR is at a high level overview. The SAR, as written, would include specific details normally provided by the Standards Drafting Team in the Standards process. Including these details in the SAR will restrict the Standards Drafting Team and their flexibility to draft the Standard.

Transmission Operator Criteria 5.4.1 states "Performing reliability analyses, both real-time and contingency analyses". While performing this is fine as a secondary responsibility, it is the Reliability Authority who has the primary responsibility for performing this function. It is recommended that 5.4.1 be removed from the Criteria process.

Would like clarification on the criteria in 4.3 "Documentation identifying the code of conduct for personnel performing the Transmission Operator responsibilities". What type of documentation?

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

Yes

No

Comments: Section 5-Data Acquisition and System Analysis: Need to add "5.7 Process/Procedures in place for coordinating with generator operators." This is a must for nuclear plants in order to ensure appropriate notifications are made to nuclear plant operators and appropriate operational studies and contingency analyses of the nuclear plant offsite power source are performed.

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

Regional Difference:

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

Comments: If a Transmission Operator also serves as a Balancing Authority, what processes are in place to prevent a code of conduct violation resulting from operation of generation facilities.

Do existing Transmission Operators have to become certified or are they Grandfathered in? What happens if an existing Transmission Operator fails the certification process?

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

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

Check all that apply

Periodic

Significant change in footprint, corporate organization, or operation

Repetitive Non-Compliance with Reliability Standards

Flagrant violation of Reliability Standards

**Comments:** For periodic re-certification, this should not occur any sooner than every 3 years.

## **SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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

### **Background**

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

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

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Certification Criteria are those requirements that an entity must meet to be “Certified” by NERC or another certifying entity such as one of the NERC Regions. NERC Certification is an indication that an organization has the resources in place and the ability to perform a reliability function, such as a Balancing Authority, Interchange Authority, etc. Entities that attain their Certification status must comply with applicable NERC Reliability Standards and criteria.

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

<b>SAR Commenter Information</b>	<b>Which Industry Segment do you represent?</b>
Name Kathleen Goodman	<input type="checkbox"/> Trans Owners <input type="checkbox"/> <b>Brokers, Aggregators, and Marketers</b>
Organization ISO New England Inc.	<input checked="" type="checkbox"/> RTOs, ISOs, RRCs <input type="checkbox"/> Large Electricity End Users
Telephone (413) 535-4111	<input type="checkbox"/> LSEs <input type="checkbox"/> Small Electricity Users
E-mail kgoodman@iso-ne.com	<input type="checkbox"/> TDUs <input type="checkbox"/> <b>Federal, State, and Provincial Regulatory or other Government Entities</b>
	<input type="checkbox"/> Generators

**Questions 1-7 address the proposed Process for certifying Transmission Operator**

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

Yes  
 No  
 Neutral

Comments:

**2. Who should certify the Transmission Operator?**

Region  
 NERC  
 RTO  
 Independent Team

Comments:

## **SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

In the certification process we expect to use questionnaires to collect much of the data. An area of concern is with the number of questionnaires that could be required. We will have several entities applying for certification at one time, and each entity may apply for more than one type of certification. We need some guidance on a fair method of determining how many questionnaires are needed.

**3. When we are certifying the Transmission Operator, please indicate how many of the Adjacent Transmission Operators should complete a questionnaire:**

- All
- Some fair percentage

Suggestions on how to determine a fair percentage:

**The recommended Review Team consists of a minimum of three individuals selected from at least three of the categories listed below:**

- **Interchange Authority**
- **Balancing Authority**
- **Reliability Authority**
- **Transmission Operator**
- **Regional Compliance Committee member**
- **Regional Operating Committee member**
- **Representative of NERC Staff**
- **Representative from another NERC Region**
- **Representative from an RTO, when applicable**

**In the alternative, the Region may elect, with the applicant agreement, to engage a completely independent review team.**

**4. Do we have the appropriate review team members identified?**

- Yes**
- No**

**Comments: Should exercise caution when selecting review team members. Having members who perform merchant functions on the team, which is the current practice, could be a violation of the Applicant's code of conduct.**

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

**5. Should a NERC staff person be assigned to each review team?**

Yes

No

Comments:

**6. Have we included anything in the certification process that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

Yes

No

Comments: Entities requiring appropriate conduct likely already bound by FERC Order 888 / 889. This is a duplicative effort and should not be included.

**7. Have we missed a step in the certification process that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

Comments:

**Questions 8-13 address the proposed Criteria included in the SAR.**

**8. Which of the following agreements do you think are necessary? (Check all that you feel should apply)**

An agreement defining responsibilities and authority (during normal and emergency conditions) of the Transmission Operator with respect to

Each applicable Reliability Authority

Each applicable Transmission Service Provider

Each applicable Distribution Provider

Comments:

**9. What other agreements should be required for the Balancing Authority?**

Comments:

**10. Do you think there is a need to have the entity performing the Transmission Operator function sign the NERC Confidentiality Agreement?**

- Yes
- No
- Neutral

Comments: See comment Item 6.

**11. Who should be required to sign a confidentiality agreement?**

- Reliability Authorities
- Balancing Authorities
- Interchange Authorities
- Transmission Operators
- Transmission Service Providers

Comments: See comment Item 6.

**12. Have we included anything in the certification criteria that you think is unnecessary?  
If yes, please provide details on what you think we should eliminate.**

- Yes
- No

Comments:

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

**13. Have we missed anything in the certification criteria that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

Comments: Having a process/procedure in place does not ensure that the reliability requirements are being fulfilled.

**14. If you are aware of any Regional Differences that need to be addressed in this SAR, please highlight them here.**

Regional Difference:

**15. Other Comments on this Certification SAR:**

Comments:

**Procedures currently exist for re-certification of control areas. Considerations are being given for inclusion of re -certification in the certification standards.**

**16. When should re -certification occur?**

Check all that apply

Periodic

Significant change in footprint, corporate organization, or operation

Repetitive Non-Compliance with Reliability Standards

Flagrant violation of Reliability Standards

**Comments:** Periodic should be something like 5 years.

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Certification Criteria are those requirements that an entity must meet to be “Certified” by NERC or another certifying entity such as one of the NERC Regions. NERC Certification is an indication that an organization has the resources in place and the ability to perform a reliability function, such as a Balancing Authority, Interchange Authority, etc. Entities that attain their Certification status must comply with applicable NERC Reliability Standards and criteria.

SAR Commenter Information		Which Industry Segment do you represent?	
Name	Martin Boisvert	<input checked="" type="checkbox"/> Trans Owners	<input type="checkbox"/> Brokers, Aggregators, and Marketers
Organization	HQ <i>TransÉnergie</i>	<input type="checkbox"/> RTOs, ISOs, RRCs	<input type="checkbox"/> Large Electricity End Users
Telephone	514-289-2211 ext.3870	<input type="checkbox"/> LSEs	<input type="checkbox"/> Small Electricity Users
E-mail	Boisvert.Martin@hydro.qc.ca	<input type="checkbox"/> TDUs	<input type="checkbox"/> Federal, State, and Provincial Regulatory or other Government Entities
		<input type="checkbox"/> Generators	

**Questions 1-7 address the proposed Process for certifying Transmission Operator**

### 1. Do you agree that there is a reliability-related need to certify the Transmission Operator function?

- Yes  
 No  
 Neutral

Comments: *NERC certification should only be required for all system operators performing actions associated with the Reliability Authority(Reliability Coordinator)/Balancing Authority and Interchange Authority in accordance with the NERC model. The Transmission operator performs his reliability activities under the responsibility and supervision of the Reliability Coordinator.*

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

**2. Who should certify the Transmission Operator?**

- Region
- NERC
- RTO
- Independent Team

Comments: *Refer to Question 1*

In the certification process we expect to use questionnaires to collect much of the data. An area of concern is with the number of questionnaires that could be required. We will have several entities applying for certification at one time, and each entity may apply for more than one type of certification. We need some guidance on a fair method of determining how many questionnaires are needed.

**3. When we are certifying the Transmission Operator, please indicate how many of the Adjacent Transmission Operators should complete a questionnaire:**

- All
- Some fair percentage

Suggestions on how to determine a fair percentage: *Refer to Question 1*

**The recommended Review Team consists of a minimum of three individuals selected from at least three of the categories listed below:**

- Interchange Authority
- Balancing Authority
- Reliability Authority
- Transmission Operator
- Regional Compliance Committee member
- Regional Operating Committee member
- Representative of NERC Staff
- Representative from another NERC Region
- Representative from an RTO, when applicable

In the alternative, the Region may elect, with the applicant agreement, to engage a completely independent review team.

**4. Do we have the appropriate review team members identified?**

- Yes
- No

Comments: *Refer to Question 1*

**5. Should a NERC staff person be assigned to each review team?**

- Yes
- No

Comments: *Refer to Question 1*

**6. Have we included anything in the certification process that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

- Yes
- No

Comments: *Refer to Question 1*

**7. Have we missed a step in the certification process that you think is necessary? If yes, please provide details on what you think should be added.**

- Yes
- No

Comments: *Refer to Question 1*

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

Questions 8-13 address the proposed Criteria included in the SAR.

**8. Which of the following agreements do you think are necessary? (Check all that you feel should apply)**

An agreement defining responsibilities and authority (during normal and emergency conditions) of the Transmission Operator with respect to

- Each applicable Reliability Authority
- Each applicable Transmission Service Provider
- Each applicable Distribution Provider

Comments:

**9. What other agreements should be required for the Balancing Authority?**

Comments: ? *This question is not applicable*

**10. Do you think there is a need to have the entity performing the Transmission Operator function sign the NERC Confidentiality Agreement?**

- Yes
- No
- Neutral

Comments: ***Organizations' (Corporate) Standards of Conduct should also apply***

**11. Who should be required to sign a confidentiality agreement?**

- Reliability Authorities
- Balancing Authorities
- Interchange Authorities
- Transmission Operators
- Transmission Service Providers

Comments: ***Either each individual or the management***

**12. Have we included anything in the certification criteria that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

- Yes       No      Comments: ***Refer to Question 1***

**13. Have we missed anything in the certification criteria that you think is necessary? If yes, please provide details on what you think should be added.**

- Yes       No      Comments: ***Refer to Question 1***

**14. If you are aware of any Regional Differences that need to be addressed in this SAR, please highlight them here.**

Regional Difference:

**15. Other Comments on this Certification SAR:**

Comments:

**Procedures currently exist for re-certification of control areas. Considerations are being given for inclusion of re-certification in the certification standards.**

**16. When should re-certification occur? Check all that apply**

- Periodic
- Significant change in footprint, corporate organization, or operation
- Repetitive Non-Compliance with Reliability Standards
- Flagrant violation of Reliability Standards

**Comments:**

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**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

<b>SAR Commenter Information</b>		<b>Which Industry Segment do you represent?</b>	
Name	Peter Burke [submitting responses for ATC's Alan Staats, Paul Steinberger, and Bobbi Welch]	<input checked="" type="checkbox"/> Trans Owners	<input type="checkbox"/> <b>Brokers, Aggregators, and Marketers</b>
Organization	American Transmission Company	<input type="checkbox"/> RTOs, ISOs, RRCs	<input type="checkbox"/> Large Electricity End Users
Telephone	262-506-6863	<input type="checkbox"/> LSEs	<input type="checkbox"/> Small Electricity Users
E-mail	PBurke@atcllc.com	<input type="checkbox"/> TDUs	<input type="checkbox"/> <b>Federal, State, and Provincial Regulatory or other Government Entities</b>
		<input type="checkbox"/> Generators	

**Questions 1-7 address the proposed Process for certifying Transmission Operator**

**1. Do you agree that there is a reliability-related need to certify the Transmission Operator function?**

Yes  
 No  
 Neutral

Comments:

**2. Who should certify the Transmission Operator?**

Region  
 NERC  
 RTO  
 Independent Team

Comments: The SAR addresses the problem where a Transmission Operator's system crosses Regional boundaries. Regions do not have uniform Policies and Procedures thus, setting the stage for conflicts. With regard to a Transmission Operator that operates in more than one Region, we believe that at least one representative from each Region should be involved in the certification process, perhaps in the make-up of a single team. Our concern with having multiple Regions involved in separate evaluation processes is that it introduces additional layers of approvals and has the potential to introduce conflicting certification criteria if there are differing requirements between Regions. In addition, the time commitment involved in receiving certification could increase dramatically if multiple certifications are required. That being said, if an entity is actually operating as two or more Transmission Operators in various Regions, then each Transmission Operator should be required to be certified under the certification requirements in its respective Region. Alternatively, having one Region as the lead Region responsible for certifying a large Transmission Operator with a major presence in several Regions, undercuts the ability of the

## **SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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other involved, non-lead Regions to provide adequate input into the process. Therefore, we feel that each Region should be represented equally/adequately. Finally, it would help solve the bias problem if NERC were the lead body in the certification process when multiple Regions are involved.

In the certification process we expect to use questionnaires to collect much of the data. An area of concern is with the number of questionnaires that could be required. We will have several entities applying for certification at one time, and each entity may apply for more than one type of certification. We need some guidance on a fair method of determining how many questionnaires are needed.

**3. When we are certifying the Transmission Operator, please indicate how many of the Adjacent Transmission Operators should complete a questionnaire:**

- All
- Some fair percentage

Suggestions on how to determine a fair percentage: If deciding to use the "some fair percentage approach," then the method should require using at least two adjacent transmission operators. This would provide some verification of data and other responses. As an aside, we noticed that this subject was not raised in the Certification SAR for either the Balancing Authority or the Interchange Authority; i.e. it is our interpretation that this issue was raised only as a concern in regard to the Transmission Operator Certification SAR as an outgrowth from the vertically integrated utility mindset. That is, an unwritten assumption was made to minimize the amount of work associated in certifying the Transmission Operator since most of the Transmission Operators will be certifying themselves as Balancing Authorities as well. We believe that this is not an appropriately visionistic view to take when considering the future of this industry.

**The recommended Review Team consists of a minimum of three individuals selected from at least three of the categories listed below:**

- **Interchange Authority**
- **Balancing Authority**
- **Reliability Authority**
- **Transmission Operator**
- **Regional Compliance Committee member**
- **Regional Operating Committee member**
- **Representative of NERC Staff**
- **Representative from another NERC Region**
- **Representative from an RTO, when applicable**

**In the alternative, the Region may elect, with the applicant agreement, to engage a completely independent review team.**

**4. Do we have the appropriate review team members identified?**

- Yes

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

No

**Comments:** Our concern here is that, if you are allowing the Review Team to be as small as three individuals, then certain of the categories should take precedence over other(s) and be required in the formation of any function specific Review Team. For example, we would like to see that a certified Transmission Operator be involved in the certification of another Transmission Operator, as they would have the greatest amount of expertise in judging another Transmission Operator. It does not make sense that a three person team could be made up of an Interchange Authority, a Balancing Authority, and a Representative from another NERC Region and have the necessary expertise to certify a Transmission Operator.

**5. Should a NERC staff person be assigned to each reviewteam?**

Yes

No

**Comments:** To the extent that multiple Regions are involved, a NERC staff person should be involved to ensure consistency.

**6. Have we included anything in the certification process that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

Yes

No

**Comments:**

**7. Have we missed a step in the certification process that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

**Comments:**

*Questions 8-13 address the proposed Criteria included in the SAR.*

**8. Which of the following agreements do you think are necessary? (Check all that you feel should apply)**

An agreement defining responsibilities and authority (during normal and emergency conditions) of the Transmission Operator with respect to

- Each applicable Reliability Authority
- Each applicable Transmission Service Provider
- Each applicable Distribution Provider

Comments:

**9. What other agreements should be required for the Balancing Authority?**

Comments: Black Start tariffs when the Balancing Authority owns and operates generation units critical to black start/restoration plans.

**10. Do you think there is a need to have the entity performing the Transmission Operator function sign the NERC Confidentiality Agreement?**

- Yes
- No
- Neutral

Comments:

**11. Who should be required to sign a confidentiality agreement?**

- Reliability Authorities
- Balancing Authorities
- Interchange Authorities
- Transmission Operators
- Transmission Service Providers

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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Comments: Any party having access to confidential transmission information.

**12. Have we included anything in the certification criteria that you think is unnecessary?  
If yes, please provide details on what you think we should eliminate.**

Yes

No

Comments:

**13. Have we missed anything in the certification criteria that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

Comments:

**14. If you are aware of any Regional Differences that need to be addressed in this SAR, please highlight them here.**

Regional Difference: We cannot cite any specific differences but I know differences do exist. It will be some time before the Regions adjust to the market influences in the operation of a safe and reliable transmission grid.

**15. Other Comments on this Certification SAR:**

Comments: (1) The title of this certification should be "Transmission Authority" versus "Transmission Operator." The fact that the term "Operator" is used, seems to denote that this function is somehow less critical to the reliability of the integrated system than the other functions, particularly in light of the fact that even the "Interchange" function is designated as an "Authority" function for certification purposes. (2) It shouldn't take nine months to complete the certification process. It should be done within six months.

**Procedures currently exist for re-certification of control areas. Considerations are being given for inclusion of re-certification in the certification standards.**

**16. When should re-certification occur?**

Check all that apply

Periodic

Significant change in footprint, corporate organization, or operation

Repetitive Non-Compliance with Reliability Standards

Flagrant violation of Reliability Standards

**Comments:** If there are no other triggers, then a Periodic time frame should apply, possibly five to eight years.

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## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

SAR Commenter Information		Which Industry Segment do you represent?	
Name	Albert DiCaprio	<input type="checkbox"/> Trans Owners	<input type="checkbox"/> Brokers, Aggregators, and Marketers
Organization	MAAC	<input checked="" type="checkbox"/> RTOs, ISOs, RRCs	<input type="checkbox"/> Large Electricity End Users
Telephone	610-666-8854	<input type="checkbox"/> LSEs	<input type="checkbox"/> Small Electricity Users
E-mail	dicapram@pjm.com	<input type="checkbox"/> TDUs	<input type="checkbox"/> Federal, State, and Provincial Regulatory or other Government Entities
		<input type="checkbox"/> Generators	

**Questions 1-7 address the proposed Process for certifying Transmission Operator**

**1. Do you agree that there is a reliability-related need to certify the Transmission Operator function?**

- Yes  
 No  
 Neutral

Comments: The Model defines the T-Oper function for the entity that physically "operates the transmission facilities, and executes switching orders."

Standards for transmission analysis is done at the RA level. The RA will approve all operating procedures that affect the bulk power system. In this role, the T-Oper really does not need to be standard savvy, it only needs to have a contractual responsibility to carry out the directives of the RA.

In short, it would appear that as defined in the Model, the T-Oper does not have to be certified on standards.

**2. Who should certify the Transmission Operator?**

- Region  
 NERC  
 RTO  
 Independent Team

Comments: See comment 1

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

In the certification process we expect to use questionnaires to collect much of the data. An area of concern is with the number of questionnaires that could be required. We will have several entities applying for certification at one time, and each entity may apply for more than one type of certification. We need some guidance on a fair method of determining how many questionnaires are needed.

**3. When we are certifying the Transmission Operator, please indicate how many of the Adjacent Transmission Operators should complete a questionnaire:**

- All
- Some fair percentage

Suggestions on how to determine a fair percentage: See comment 1

**The recommended Review Team consists of a minimum of three individuals selected from at least three of the categories listed below:**

- Interchange Authority
- Balancing Authority
- Reliability Authority
- Transmission Operator
- Regional Compliance Committee member
- Regional Operating Committee member
- Representative of NERC Staff
- Representative from another NERC Region
- Representative from an RTO, when applicable

**In the alternative, the Region may elect, with the applicant agreement, to engage a completely independent review team.**

**4. Do we have the appropriate review team members identified?**

- Yes
- No

**Comments: See comment 1**

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

**5. Should a NERC staff person be assigned to each review team?**

- Yes  
 No

Comments: See comment 1

**6. Have we included anything in the certification process that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

- Yes  
 No

Comments: See comment 1

**7. Have we missed a step in the certification process that you think is necessary? If yes, please provide details on what you think should be added.**

- Yes  
 No

Comments: See comment 1

**Questions 8-13 address the proposed Criteria included in the SAR.**

**8. Which of the following agreements do you think are necessary? (Check all that you feel should apply)**

An agreement defining responsibilities and authority (during normal and emergency conditions) of the Transmission Operator with respect to

- Each applicable Reliability Authority  
 Each applicable Transmission Service Provider  
 Each applicable Distribution Provider

Comments:

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

### 9. What other agreements should be required for the Balancing Authority?

Comments: See comment 1

### 10. Do you think there is a need to have the entity performing the Transmission Operator function sign the NERC Confidentiality Agreement?

- Yes
- No
- Neutral

Comments: See comment 1

### 11. Who should be required to sign a confidentiality agreement?

- Reliability Authorities
- Balancing Authorities
- Interchange Authorities
- Transmission Operators
- Transmission Service Providers

Comments:

### 12. Have we included anything in the certification criteria that you think is unnecessary? If yes, please provide details on what you think we should eliminate.

- Yes
- No

Comments: See comment 1

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

**13. Have we missed anything in the certification criteria that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

Comments:

**14. If you are aware of any Regional Differences that need to be addressed in this SAR, please highlight them here.**

Regional Difference: See comment 1

**15. Other Comments on this Certification SAR:**

Comments:

**Procedures currently exist for re-certification of control areas. Considerations are being given for inclusion of re -certification in the certification standards.**

**16. When should re -certification occur?**

Check all that apply

Periodic

Significant change in footprint, corporate organization, or operation

Repetitive Non-Compliance with Reliability Standards

Flagrant violation of Reliability Standards

**Comments:** See comment 1

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### **Background**

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The OCTF held a series of workshops and posted a White Paper to collect preliminary industry comments on the criteria relevant to the new functional entities and there-by develop new processes and procedures for certifying each of these entities. (All the comments collected during these preliminary steps are posted at <http://www.nerc.com/~filez/octf.html>)

This SAR is one of four SARs being posted simultaneously for comment. These SARs, collectively, identify the certification criteria for the Reliability Authority (RA), Balancing Authority (BA), Interchange Authority (IA) and Transmission Operator (TOP). At this time, these are the only functions being considered for certification. Other functions may be considered for certification in the future. (The functions referred to here are the functions identified in the NERC Functional Model. <http://www.nerc.com/~oc/fmrtg.html>) Entities that serve multiple reliability functions may need to attain more than one certification.

Certification Criteria are those requirements that an entity must meet to be “Certified” by NERC or another certifying entity such as one of the NERC Regions. NERC Certification is an indication that an organization has the resources in place and the ability to perform a reliability function, such as a Balancing Authority, Interchange Authority, etc. Entities that attain their Certification status must comply with applicable NERC Reliability Standards and criteria.

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

SAR Commenter Information		Which Industry Segment do you represent?	
Name	John Stickley	<input checked="" type="checkbox"/> Trans Owners	<input type="checkbox"/> Brokers, Aggregators, and Marketers
Organization	Associated Electric Cooperative, Inc.	<input type="checkbox"/> RTOs, ISOs, RRCs	<input type="checkbox"/> Large Electricity End Users
Telephone	(417) 885-9397	<input type="checkbox"/> LSEs	<input type="checkbox"/> Small Electricity Users
E-mail	jstickley@aeci.org	<input type="checkbox"/> TDUs	<input type="checkbox"/> Federal, State, and Provincial Regulatory or other Government Entities
		<input type="checkbox"/> Generators	

**Questions 1-7 address the proposed Process for certifying Transmission Operator**

**1. Do you agree that there is a reliability-related need to certify the Transmission Operator function?**

- Yes  
 No  
 Neutral

Comments: Certification of the Transmission Operator function is necessary from a reliability perspective. However, AECl believes that it makes little sense to go about certifying Transmission Operators to perform functions for which there are currently no standards. It seems that we're getting the cart ahead of the horse.

**2. Who should certify the Transmission Operator?**

- Region  
 NERC  
 RTO  
 Independent Team

Comments:

## **SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

In the certification process we expect to use questionnaires to collect much of the data. An area of concern is with the number of questionnaires that could be required. We will have several entities applying for certification at one time, and each entity may apply for more than one type of certification. We need some guidance on a fair method of determining how many questionnaires are needed.

**3. When we are certifying the Transmission Operator, please indicate how many of the Adjacent Transmission Operators should complete a questionnaire:**

All

Some fair percentage

Suggestions on how to determine a fair percentage:

**The recommended Review Team consists of a minimum of three individuals selected from at least three of the categories listed below:**

- Interchange Authority
- Balancing Authority
- Reliability Authority
- Transmission Operator
- Regional Compliance Committee member
- Regional Operating Committee member
- Representative of NERC Staff
- Representative from another NERC Region
- Representative from an RTO, when applicable

In the alternative, the Region may elect, with the applicant agreement, to engage a completely independent review team.

**4. Do we have the appropriate review team members identified?**

Yes

No

**Comments:**

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

**5. Should a NERC staff person be assigned to each review team?**

- Yes  
 No

Comments: AECI does not believe that a NERC staff person must be assigned to each certification review team, as long as the review teams perform their functions in a uniform manner. All Transmission Operators need to be certified through the same process, with variances only for regional differences.

**6. Have we included anything in the certification process that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

- Yes  
 No

Comments:

**7. Have we missed a step in the certification process that you think is necessary? If yes, please provide details on what you think should be added.**

- Yes  
 No

Comments:

*Questions 8-13 address the proposed Criteria included in the SAR.*

**8. Which of the following agreements do you think are necessary? (Check all that you feel should apply)**

An agreement defining responsibilities and authority (during normal and emergency conditions) of the Transmission Operator with respect to

- Each applicable Reliability Authority  
 Each applicable Transmission Service Provider  
 Each applicable Distribution Provider

Comments:

**9. What other agreements should be required for the Balancing Authority?**

Comments: I believe this question should have been directed toward the Transmission Operator rather than the Balancing Authority. No comments regardless.

**10. Do you think there is a need to have the entity performing the Transmission Operator function sign the NERC Confidentiality Agreement?**

- Yes
- No
- Neutral

Comments:

**11. Who should be required to sign a confidentiality agreement?**

- Reliability Authorities
- Balancing Authorities
- Interchange Authorities
- Transmission Operators
- Transmission Service Providers

Comments:

**12. Have we included anything in the certification criteria that you think is unnecessary?  
If yes, please provide details on what you think we should eliminate.**

- Yes
- No

Comments:

**13. Have we missed anything in the certification criteria that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

Comments:

**14. If you are aware of any Regional Differences that need to be addressed in this SAR, please highlight them here.**

Regional Difference:

**15. Other Comments on this Certification SAR:**

Comments:

**Procedures currently exist for re-certification of control areas. Considerations are being given for inclusion of re -certification in the certification standards.**

**16. When should re -certification occur?**

Check all that apply

Periodic

Significant change in footprint, corporate organization, or operation

Repetitive Non-Compliance with Reliability Standards

Flagrant violation of Reliability Standards

**Comments:** Re-certification should only be necessary when the Transmission Operator's ability to perform its functions according to applicable standards (again, note that no standards are currently set) is in question, be that due to changes within the Transmission Operator itself or due to poor performance by the Transmission Operator in meeting applicable standards.

## **SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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### **Background**

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The OCTF held a series of workshops and posted a White Paper to collect preliminary industry comments on the criteria relevant to the new functional entities and there-by develop new processes and procedures for certifying each of these entities. (All the comments collected during these preliminary steps are posted at <http://www.nerc.com/~filez/octf.html>)

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**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

<b>SAR Commenter Information</b>	<b>Which Industry Segment do you represent?</b>
Name Tom Pruitt	<input checked="" type="checkbox"/> Trans Owners <input type="checkbox"/> Brokers, Aggregators, and Marketers
Organization Duke Energy Grid Operations	<input type="checkbox"/> RTOs, ISOs, RRCs <input type="checkbox"/> Large Electricity End Users
Telephone 704 382-4676	<input type="checkbox"/> LSEs <input type="checkbox"/> Small Electricity Users
E-mail tvpruitt@duke-energy.com	<input type="checkbox"/> TDUs <input type="checkbox"/> Federal, State, and Provincial Regulatory or other Government Entities
	<input type="checkbox"/> Generators

**Questions 1-7 address the proposed Process for certifying Transmission Operator**

**1. Do you agree that there is a reliability-related need to certify the Transmission Operator function?**

Yes  
 No  
 Neutral

Comments:

**2. Who should certify the Transmission Operator?**

Region  
 NERC  
 RTO  
 Independent Team

Comments: This function is part of the NERC functional model, so certification should be at the same level. The certification process, however, does need to recognize regional differences.

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

In the certification process we expect to use questionnaires to collect much of the data. An area of concern is with the number of questionnaires that could be required. We will have several entities applying for certification at one time, and each entity may apply for more than one type of certification. We need some guidance on a fair method of determining how many questionnaires are needed.

**3. When we are certifying the Transmission Operator, please indicate how many of the Adjacent Transmission Operators should complete a questionnaire:**

All

Some fair percentage

Suggestions on how to determine a fair percentage:

**The recommended Review Team consists of a minimum of three individuals selected from at least three of the categories listed below:**

- Interchange Authority
- Balancing Authority
- Reliability Authority
- Transmission Operator
- Regional Compliance Committee member
- Regional Operating Committee member
- Representative of NERC Staff
- Representative from another NERC Region
- Representative from an RTO, when applicable

**In the alternative, the Region may elect, with the applicant agreement, to engage a completely independent review team.**

**4. Do we have the appropriate review team members identified?**

Yes

No

**Comments: Given that we think NERC should be the certifying entity and a NERC Staff rep should be on each team, a team should have minimum of 4 members.**

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

**5. Should a NERC staff person be assigned to each review team?**

Yes

No

Comments: See comments for question 4.

**6. Have we included anything in the certification process that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

Yes

No

Comments:

**7. Have we missed a step in the certification process that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

Comments: To reiterate, NERC should lead the review and make the certification decision.

**Questions 8-13 address the proposed Criteria included in the SAR.**

**8. Which of the following agreements do you think are necessary? (Check all that you feel should apply)**

An agreement defining responsibilities and authority (during normal and emergency conditions) of the Transmission Operator with respect to

Each applicable Reliability Authority

Each applicable Transmission Service Provider

Each applicable Distribution Provider

Comments: This authority/provider should have agreements in place with all functional entities with which it interfaces (consistent with Certification Criterion 2).

**9. What other agreements should be required for the Balancing Authority?**

Comments: I think this question is misplaced. Shouldn't it be on the BA SAR comment form?

**10. Do you think there is a need to have the entity performing the Transmission Operator function sign the NERC Confidentiality Agreement?**

- Yes
- No
- Neutral

Comments:

**11. Who should be required to sign a confidentiality agreement?**

- Reliability Authorities
- Balancing Authorities
- Interchange Authorities
- Transmission Operators
- Transmission Service Providers

Comments: Any entity which receives data that is considered to be confidential should sign a confidentiality agreement.

**12. Have we included anything in the certification criteria that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

- Yes
- No

Comments:

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

**13. Have we missed anything in the certification criteria that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

Comments:

**14. If you are aware of any Regional Differences that need to be addressed in this SAR, please highlight them here.**

Regional Difference:

**15. Other Comments on this Certification SAR:**

Comments:

**Procedures currently exist for re-certification of control areas. Considerations are being given for inclusion of re -certification in the certification standards.**

**16. When should re -certification occur?**

Check all that apply

Periodic

Significant change in footprint, corporate organization, or operation

Repetitive Non-Compliance with Reliability Standards

Flagrant violation of Reliability Standards

**Comments:** Periodicity should be every 5 years or for cause. Significant changes in corporate organization should not be a trigger for recertification unless accompanied by significant changes in footprint and/or operation.

## **SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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The OCTF held a series of workshops and posted a White Paper to collect preliminary industry comments on the criteria relevant to the new functional entities and there-by develop new processes and procedures for certifying each of these entities. (All the comments collected during these preliminary steps are posted at <http://www.nerc.com/~filez/octf.html>)

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## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

SAR Commenter Information		Which Industry Segment do you represent?	
Name	Roger D Green	<input type="checkbox"/> Trans Owners	<input type="checkbox"/> Brokers, Aggregators, and Marketers
Organization	Southern Company Services - SOCO Generation	<input type="checkbox"/> RTOs, ISOs, RRCs	<input type="checkbox"/> Large Electricity End Users
Telephone	205-257-1903	<input type="checkbox"/> LSEs	<input type="checkbox"/> Small Electricity Users
E-mail	rdgreen@southernco.com	<input type="checkbox"/> TDUs	<input type="checkbox"/> Federal, State, and Provincial Regulatory or other Government Entities
		<input checked="" type="checkbox"/> Generators	

**Questions 1-7 address the proposed Process for certifying Transmission Operator**

**1. Do you agree that there is a reliability-related need to certify the Transmission Operator function?**

- Yes  
 No  
 Neutral

Comments:

**2. Who should certify the Transmission Operator?**

- Region  
 NERC  
 RTO  
 Independent Team

Comments: Each Region should already have the fundamental structure / organization, collective expertise, reliability knowledge and experience, and representation among its members to handle this appropriately.

## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

In the certification process we expect to use questionnaires to collect much of the data. An area of concern is with the number of questionnaires that could be required. We will have several entities applying for certification at one time, and each entity may apply for more than one type of certification. We need some guidance on a fair method of determining how many questionnaires are needed.

**3. When we are certifying the Transmission Operator, please indicate how many of the Adjacent Transmission Operators should complete a questionnaire:**

All

Some fair percentage

Suggestions on how to determine a fair percentage:

**The recommended Review Team consists of a minimum of three individuals selected from at least three of the categories listed below:**

- Interchange Authority
- Balancing Authority
- Reliability Authority
- Transmission Operator
- Regional Compliance Committee member
- Regional Operating Committee member
- Representative of NERC Staff
- Representative from another NERC Region
- Representative from an RTO, when applicable

**In the alternative, the Region may elect, with the applicant agreement, to engage a completely independent review team.**

**4. Do we have the appropriate review team members identified?**

Yes

No

**Comments: The Review Team should have representation from the Generation Sector. Actions and decisions made by the Transmission Operator have direct and indirect impacts on the generating plants. Each Region should be encouraged to form a Generation Subcommittee or Working Group that would be involved in the certification process because the Generator is a fundamental component of the NERC Functional Model.**

**5. Should a NERC staff person be assigned to each review team?**

Yes

No

Comments: Having a NERC staff person involved to help facilitate the process should help complete the process more quickly and avoid certain pitfalls.

**6. Have we included anything in the certification process that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

Yes

No

Comments: See our response to Question 15.

**7. Have we missed a step in the certification process that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

Comments: None that we can think of at this stage. See our response to Question 15.

***Questions 8-13 address the proposed Criteria included in the SAR.***

**8. Which of the following agreements do you think are necessary? (Check all that you feel should apply)**

An agreement defining responsibilities and authority (during normal and emergency conditions) of the Transmission Operator with respect to

Each applicable Reliability Authority

Each applicable Transmission Service Provider

Each applicable Distribution Provider

Comments:

**9. What other agreements should be required for the Balancing Authority?**

Comments: We believe this question should state "What other agreements should be required for the Transmission Operator?" Our response follows: Such agreements must be in place for the Transmission Operator to perform its function. However, we believe the certification process should only require the applicant to have the processes in place for developing the appropriate agreements in order for them to obtain certification. The actual signed agreements should not be required until after certification.

In addition, there should be a requirement for agreements that define responsibilities and authority (during normal and emergency conditions) of the Transmission Operator with respect to generating plants, including nuclear plants because they rely on the grid as their preferred power source for safe shutdown equipment.

**10. Do you think there is a need to have the entity performing the Transmission Operator function sign the NERC Confidentiality Agreement?**

Yes

No

Neutral

Comments:

**11. Who should be required to sign a confidentiality agreement?**

Reliability Authorities

Balancing Authorities

Interchange Authorities

Transmission Operators

Transmission Service Providers

Comments: Without knowing the details of the confidentiality agreement and whether it would prevent an entity from performing other economic generator-related functions, it is unclear whether a Balancing Authority should be required to sign.

**12. Have we included anything in the certification criteria that you think is unnecessary?  
If yes, please provide details on what you think we should eliminate.**

Yes

No

Comments: See our response to Question 15.

**13. Have we missed anything in the certification criteria that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

Comments: Section 5 titled Data Acquisition and System Analysis: Need to add "5.7 Process/procedures in place for coordinating with generator operators." (This is a must for nuclear plants in order to ensure appropriate notifications are made to nuclear plant operators and appropriate operational studies and contingency analyses of the nuclear plant offsite power source are performed.)

Also, see our response to Question 15.

**14. If you are aware of any Regional Differences that need to be addressed in this SAR, please highlight them here.**

Regional Difference:

**15. Other Comments on this Certification SAR:**

Comments: The SAR should establish the minimum acceptable certification processes and criteria that are needed to ensure reliability requirements are met. However, as the standard itself is being developed, the industry may identify changes that would enhance the process and/or criteria. Therefore, provisions should be made in the SAR to permit enhancements to the certification process and criteria during development of the standard itself. One approach would be for the SAR to only outline the key minimum elements that should be included in the certification process, and not try to define specific steps.

**Procedures currently exist for re-certification of control areas. Considerations are being given for inclusion of re -certification in the certification standards.**

**16. When should re -certification occur?**

Check all that apply

Periodic

Significant change in footprint, corporate organization, or operation

Repetitive Non-Compliance with Reliability Standards

Flagrant violation of Reliability Standards

**Comments:**

**SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR**

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## SAR Comment Form for 1st Posting of the Transmission Operator Certification SAR

SAR Commenter Information		Which Industry Segment do you represent?	
Name	Gerald Rheault	<input checked="" type="checkbox"/> Trans Owners	<input type="checkbox"/> Brokers, Aggregators, and Marketers
Organization	Manitoba Hydro	<input type="checkbox"/> RTOs, ISOs, RRCs	<input type="checkbox"/> Large Electricity End Users
Telephone	204-487-5423	<input checked="" type="checkbox"/> LSEs	<input type="checkbox"/> Small Electricity Users
E-mail	gnrheault@hydro.mb.ca	<input type="checkbox"/> TDUs	<input type="checkbox"/> Federal, State, and Provincial Regulatory or other Government Entities
		<input checked="" type="checkbox"/> Generators	

**Questions 1-7 address the proposed Process for certifying Transmission Operator**

**1. Do you agree that there is a reliability-related need to certify the Transmission Operator function?**

- Yes  
 No  
 Neutral

Comments:

**2. Who should certify the Transmission Operator?**

- Region  
 NERC  
 RTO  
 Independent Team

Comments: Manitoba Hydro believes that the region could be involved in the certification process; but the final responsibility for deciding whether an entity qualifies to be certified should rest with NERC. It will be NERC's responsibility to ensure that the Certification Criteria is applied uniformly in all regions.

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In the certification process we expect to use questionnaires to collect much of the data. An area of concern is with the number of questionnaires that could be required. We will have several entities applying for certification at one time, and each entity may apply for more than one type of certification. We need some guidance on a fair method of determining how many questionnaires are needed.

**3. When we are certifying the Transmission Operator, please indicate how many of the Adjacent Transmission Operators should complete a questionnaire:**

- All
- Some fair percentage

Suggestions on how to determine a fair percentage: Any Transmission Operator directly interconnected to the entity being certified should complete a questionnaire. If this number is greater than three; limit it to the three most significant in size.

**The recommended Review Team consists of a minimum of three individuals selected from at least three of the categories listed below:**

- **Interchange Authority**
- **Balancing Authority**
- **Reliability Authority**
- **Transmission Operator**
- **Regional Compliance Committee member**
- **Regional Operating Committee member**
- **Representative of NERC Staff**
- **Representative from another NERC Region**
- **Representative from an RTO, when applicable**

**In the alternative, the Region may elect, with the applicant agreement, to engage a completely independent review team.**

**4. Do we have the appropriate review team members identified?**

- Yes
- No

**Comments: Manitoba Hydro believes that this issue does not belong in the Standard as discussed in detail in the question 6 comment.**

**However, since there will be a requirement to address the issue of Review Team**

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membership in an administrative document relative to this Standard, following is Manitoba Hydro's comments relative to the composition of the Review Team. The review team should be composed of three members. These members should be selected from the following categories:

1. NERC staff.
2. Region staff.
3. an independent organization who has expertise in conducting this type of review

The exact composition of representation, from the three classification of entities listed above, is not critical. The Review Team should be composed of individuals who possess expertise in doing these kinds of reviews.

The review team should not include representation from certified authorities or RTO staff because of possible conflict of interest issues.

**5. Should a NERC staff person be assigned to each review team?**

- Yes  
 No

Comments: Refer to question 4 and question 6 comments.

**6. Have we included anything in the certification process that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

- Yes  
 No

Comments: Manitoba Hydro believes that the entire section entitled "Detailed Description of New Standard or Revision to Existing Standard" should be removed from the SAR. The SAR documentation should only start at the section entitled "Reliability Authority Certification Criteria". The Standard which will be produced from this SAR should only deal with "Criteria" and not "Process".

The documentation contained in the section entitled "Detailed Description of New Standard or Revision to Existing Standard" is very relevant in the overall process of certification and should be included in the administrative documentation related to this Standard but does not belong in the Standard itself.

**7. Have we missed a step in the certification process that you think is necessary? If yes, please provide details on what you think should be added.**

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Yes

No

Comments: The certification process to be followed should not be included in the Standard and therefore also not in the SAR. That is an administrative document and does not belong in the Standard. See question 6 comment for further details.

**Questions 8-13 address the proposed Criteria included in the SAR.**

**8. Which of the following agreements do you think are necessary? (Check all that you feel should apply)**

An agreement defining responsibilities and authority (during normal and emergency conditions) of the Transmission Operator with respect to

Each applicable Reliability Authority

Each applicable Transmission Service Provider

Each applicable Distribution Provider

Comments: For regions and entities, where the organizational as well as functional unbundling of the functions defined in the Functional Model has occurred, there is a need to develop Agreements which define the responsibilities of each function to one another.

For regions and entities, where physical unbundling without organizational unbundling or no unbundling has occurred, there should be policy documents in place which define the responsibilities and authority of one function relative to another which serves the same purpose as an Agreement between the two functions within the same entity.

The SAR and the subsequent Standard to be developed should be flexible enough to address both of these situations. An agreement should be required when separate organizational entities are involved and appropriate policies should be acceptable when different functions within the same entity are involved.

**9. What other agreements should be required for the Balancing Authority?**

Comments: The ones included in the SAR are adequate for proper functioning of the Transmission Operator.

**10. Do you think there is a need to have the entity performing the Transmission Operator function sign the NERC Confidentiality Agreement?**

Yes

No

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Neutral

Comments: Manitoba Hydro doesn't see any purpose to signing a confidentiality Agreement. Any requirement for confidentiality in dealing with data from other entities should be addressed in the agreement between the Transmission Operator and the other functions.

### 11. Who should be required to sign a confidentiality agreement?

- Reliability Authorities
- Balancing Authorities
- Interchange Authorities
- Transmission Operators
- Transmission Service Providers

Comments: same reply as in question 10 above.

### 12. Have we included anything in the certification criteria that you think is unnecessary? If yes, please provide details on what you think we should eliminate.

- Yes
- No

Comments: Manitoba Hydro believes that the "code of conduct for personnel" referenced in sections 4.3 and 4.4 is unnecessary. The responsibilities, for each staff member performing functions as part of this functional authority, should be defined in the policy document for the functional authority.

**13. Have we missed anything in the certification criteria that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

Comments: Manitoba Hydro believes that the list of processes/procedures and tools contained in item 5.4 is incomplete. It leaves out items such as phase shifters, compensation devices, and other elements. Therefore words should be used which are all inclusive such as referencing operating and switching all transmission system equipment.

**14. If you are aware of any Regional Differences that need to be addressed in this SAR, please highlight them here.**

Regional Difference: Manitoba Hydro is not aware of any Regional Differences which need to be addressed.

**15. Other Comments on this Certification SAR:**

Comments: Manitoba Hydro believes that the "Purpose /Industry Need" section of the SAR is poorly written. The purpose should be stated as "To establish an appropriate certification process to ensure that the Reliability Authority is capable of performing its required functions". The Brief Description should focus on the content of the Standard; the criteria related to processes, procedures, tools and agreements required to ensure that the reliability related functions of the Reliability Authority can be carried out.

**Procedures currently exist for re-certification of control areas. Considerations are being given for inclusion of re -certification in the certification standards.**

**16. When should re -certification occur?**

Check all that apply

Periodic

Significant change in footprint, corporate organization, or operation

Repetitive Non-Compliance with Reliability Standards

Flagrant violation of Reliability Standards

**Comments:** There is no purpose in performing a re-certification on a Functional Authority which is operating satisfactorily. Other Standards which are presently being developed will periodically review whether this Functional Authority is properly performing the tasks required of it. This will be done through a self-certification review or a Reliability Audit which are performed on a yearly and three year basis respectively. If these reviews result in non compliance then a re-

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certification review may be required.



1515 BROADWAY, NEW YORK, NY 10036-8901 TELEPHONE: (212) 840-1070 FAX: (212) 302-2782

January 10, 2003

**Subject: Additional NPCC Comments to All Posted Certification SARs,  
(TO, IA, RA, and BA)**

NPCC would like to submit the following overall comments regarding the Certification SARs.

**“NPCC feels the certification processes as outlined in the four posted SARs are not Reliability Standards and as such should not be subject to the same development and approval processes as Reliability Standards outlined in the Process Manual. NERC needs to develop an alternate process for dealing with non-reliability standard/policy issues such as these.”**

**“At this time, the NERC Functional Model has not been finalized and NPCC recommends delaying the development of the Certification Process until such time as the Model is finalized and all proper approvals have been granted.”**

Please do not hesitate to e-mail me at [gzito@npcc.org](mailto:gzito@npcc.org) or call me at (212) 840-1070, if you have any further questions or comments.

Very truly yours,

Guy V. Zito  
Manager, Planning  
Northeast Power Coordinating Council

Cc: Edward Schwerdt NPCC

Stanley Kopman NPCC

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*The latest version of this SAR (TOP\_CERTIFICATION\_01\_01) is posted on the Standards web site at: <http://www.nerc.com/~filez/sar-approved.html>*

*E-mail this form between December 1–January 10, 2003, to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with “SAR Comments” in the subject line.*

***Please review the SAR and answer the questions in the yellow boxes.***

NOTE: The SAR contains the process for certification, followed by the criteria for certification; the questions in this SAR Comment Form are presented in the same order as the SAR.

*If you have questions, please call Maureen Long at 305-891-5497 or send a question to [spm@nerc.com](mailto:spm@nerc.com).*

### **Background**

The Organization Certification Task Force (OCTF) was formed several months ago to draft certification and registration programs to replace the existing Control Area certification and organization registration processes and procedures.

The OCTF held a series of workshops and posted a White Paper to collect preliminary industry comments on the criteria relevant to the new functional entities and there-by develop new processes and procedures for certifying each of these entities. (All the comments collected during these preliminary steps are posted at <http://www.nerc.com/~filez/octf.html>)

This SAR is one of four SARs being posted simultaneously for comment. These SARs, collectively, identify the certification criteria for the Reliability Authority (RA), Balancing Authority (BA), Interchange Authority (IA) and Transmission Operator (TOP). At this time, these are the only functions being considered for certification. Other functions may be considered for certification in the future. (The functions referred to here are the functions identified in the NERC Functional Model. <http://www.nerc.com/~oc/fmrtg.html>) Entities that serve multiple reliability functions may need to attain more than one certification.

Certification Criteria are those requirements that an entity must meet to be “Certified” by NERC or another certifying entity such as one of the NERC Regions. NERC Certification is an indication that an organization has the resources in place and the ability to perform a reliability function, such as a Balancing Authority, Interchange Authority, etc. Entities that attain their Certification status must comply with applicable NERC Reliability Standards and criteria.

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SAR Commenter Information		Which Industry Segment do you represent?	
Name	Ed Riley	<input type="checkbox"/> Trans Owners	<input type="checkbox"/> Brokers, Aggregators, and Marketers
Organization	CISO	<input checked="" type="checkbox"/> RTOs, ISOs, RRCs	<input type="checkbox"/> Large Electricity End Users
Telephone	916.351.4463	<input type="checkbox"/> LSEs	<input type="checkbox"/> Small Electricity Users
E-mail	eriley@caiso.com	<input type="checkbox"/> TDUs	<input type="checkbox"/> Federal, State, and Provincial Regulatory or other Government Entities
		<input type="checkbox"/> Generators	

**Questions 1-7 address the proposed Process for certifying Transmission Operator**

**1. Do you agree that there is a reliability-related need to certify the Transmission Operator function?**

- Yes  
 No  
 Neutral

Comments:

**2. Who should certify the Transmission Operator?**

- Region  
 NERC  
 RTO  
 Independent Team

Comments: NERC should be the certifying body when regional boundaries are exceeded by any "authority".

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In the certification process we expect to use questionnaires to collect much of the data. An area of concern is with the number of questionnaires that could be required. We will have several entities applying for certification at one time, and each entity may apply for more than one type of certification. We need some guidance on a fair method of determining how many questionnaires are needed.

**3. When we are certifying the Transmission Operator, please indicate how many of the Adjacent Transmission Operators should complete a questionnaire:**

All

Some fair percentage

Suggestions on how to determine a fair percentage:

**The recommended Review Team consists of a minimum of three individuals selected from at least three of the categories listed below:**

- **Interchange Authority**
- **Balancing Authority**
- **Reliability Authority**
- **Transmission Operator**
- **Regional Compliance Committee member**
- **Regional Operating Committee member**
- **Representative of NERC Staff**
- **Representative from another NERC Region**
- **Representative from an RTO, when applicable**

**In the alternative, the Region may elect, with the applicant agreement, to engage a completely independent review team.**

**4. Do we have the appropriate review team members identified?**

Yes

No

**Comments: The reviewing parties must have some expertise in the functions, roles, and responsibilities of the "authority" to be reviewed; it doesn't really matter what category they come from. There should always be a fourth individual from the NERC staff on each review team to ensure consistency and objectivity. The CISO believes it is inappropriate for a region to engage an independent review team - NERC should be the certifying body if the**

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region doesn't want to do it.

**5. Should a NERC staff person be assigned to each review team?**

Yes

No

Comments: See 4. above.

**6. Have we included anything in the certification process that you think is unnecessary? If yes, please provide details on what you think we should eliminate.**

Yes

No

Comments:

**7. Have we missed a step in the certification process that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

Comments:

**Questions 8-13 address the proposed Criteria included in the SAR.**

**8. Which of the following agreements do you think are necessary? (Check all that you feel should apply)**

An agreement defining responsibilities and authority (during normal and emergency conditions) of the Transmission Operator with respect to

Each applicable Reliability Authority

Each applicable Transmission Service Provider

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Each applicable Distribution Provider

Comments: The use of the term "agreement" is not defined sufficiently. The term could refer to a contract, a tariff, or processes and procedures, possibly even undocumented, between two or more entities. It appears that, at the minimum, procedures for both normal and emergency operations should be in place and that these procedures could be reviewed as part of the certification process. The CISO believes that NERC, and NERC Standards, need not be concerned with distribution issues or agreements unless there is a specific situation that could impact the reliability of the bulk electric system.

### 9. What other agreements should be required for the Balancing Authority?

Comments: Data provision if not already covered as part of another "agreement".

### 10. Do you think there is a need to have the entity performing the Transmission Operator function sign the NERC Confidentiality Agreement?

Yes

No

Neutral

Comments: We are confused by this question - what type of confidentiality agreement are you considering? The NERC data confidentiality agreement or some other agreement?

### 11. Who should be required to sign a confidentiality agreement?

Reliability Authorities

Balancing Authorities

Interchange Authorities

Transmission Operators

Transmission Service Providers

Comments: We are confused by this question - what type of confidentiality agreement are you considering? The NERC data confidentiality agreement or some other agreement?

### 12. Have we included anything in the certification criteria that you think is unnecessary? If yes, please provide details on what you think we should eliminate.

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Yes

No

Comments:

**13. Have we missed anything in the certification criteria that you think is necessary? If yes, please provide details on what you think should be added.**

Yes

No

Comments:

**14. If you are aware of any Regional Differences that need to be addressed in this SAR, please highlight them here.**

Regional Difference: WECC has a data confidentiality agreement in place for real time operating data.

**15. Other Comments on this Certification SAR:**

Comments:

**Procedures currently exist for re-certification of control areas. Considerations are being given for inclusion of re -certification in the certification standards.**

**16. When should re -certification occur?**

Check all that apply

Periodic

Significant change in footprint, corporate organization, or operation

Repetitive Non-Compliance with Reliability Standards

Flagrant violation of Reliability Standards

**Comments:** All of the above are appropriate triggers for review/recertification.