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

Summary Consideration: Although there appears to be an industry consensus that the TOP should be certified, there is has been some question with regards to the certification of the TOP and the Functional Model. The original criteria that was established by the OCTF was based on certifying the RA, BA, IA, TSP which were all identified in the Functional Model. When the OCTF held their workshops on the criteria contained in the Organization Certification White Paper, industry response received at the workshops and comments received from the posting indicated an industry consensus that it was the TOP that should be certified instead of the TSP. It was at that time that the OCTF developed the criteria for the TOP and dropped all efforts to certify the TSP.

Commenter	Yes	No	Neutral	Comments
Thomas J. Vandervort, Transmission Subcommittee Secretary#3, 5	X		X	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.
Your comments will be considered in the modification made to the SAR in preparation for a second posting.				
Barry Gee National Grid #1 David Little Nova Scotia #1,3,5 A. Ralf Rufrano NYPA #1 John Muir Con Ed #1 Guy Zito NPCC #2	X X X X X			National Grid (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.
The criteria for certified personnel are under the responsibility of the Personnel Subcommittee. Your concerns will be forwarded to the PS for consideration.				
Joseph Krupar FL Muni Pwr Agency #3		X		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

				<p>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.</p>
<p>The criteria that was used in determination of certification requirements were based on the concepts of the Functional Model.</p>				
Martin Boisvert HQ #1		X		<p>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.</p> <p>The Transmission operator performs his reliability activities under the responsibility and supervision of the Reliability Coordinator.</p>
<p>The criteria for certified personnel are under the responsibility of the Personnel Subcommittee. Your concerns will be forwarded to the PS for consideration.</p>				
Michael Desselle AEP #1		X		<p>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:</p> <ol style="list-style-type: none"> 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

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				<p>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 critical to ensuring operating reliability and minimizing congestion, the Task Force also believes that the organization serving as the TSP function should be certified.</p> <p>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.</p>
<p>The criteria for certified personnel are under the responsibility of the Personnel Subcommittee. Your concerns will be forwarded to the PS for consideration.</p> <p>The original criteria that was established by the OCTF was based on certifying the RA, BA, IA, TSP which were all identified in the Functional Model. When the OCTF held their workshops on the criteria contained in the Organization Certification White Paper, industry response received at the workshops and comments received from the posting indicated an industry consensus that it was the TOP that should be certified instead of the TSP. It was at that time that the OCTF developed the criteria for the TOP and dropped all efforts to certify the TSP.</p>				
AL DiCaprio MAAC #2		X		<p>The Model defines the T-Oper function for the entity that physically "operates the transmission facilities, and executes switching orders."</p> <p>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 sauvy, it only needs to have a contractual responsibility to carry out the directives of the RA.</p> <p>In short, it would appear that as defined in the Model, the T-Oper does not have to be certified on standards.</p>
<p>The original criteria that was established by the OCTF was based on certifying the RA, BA, IA, TSP which were all identified in the Functional Model. When the OCTF held their workshops on the criteria contained in the Organization Certification White Paper, industry response received at the workshops and comments received from the posting indicated an industry consensus that it was the TOP that should be certified instead of the TSP. It was at that time that the OCTF developed the criteria for the TOP and dropped all efforts to certify the TSP.</p>				
Alan Boesch NBPP #1			X	If Transmission Operators are certified why not certify Generators?
<p>The criteria that was used in determination of certification requirements were based on the concepts of the Functional Model. When the OCTF held their workshops on the criteria contained in the Organization Certification White Paper, industry response received at the workshops and comments received from the posting indicated an industry consensus that it was the TOP that should be certified instead of the TSP. It was at that time that the OCTF developed the criteria for the TOP and dropped all efforts to certify the TSP.</p>				
Carter B. Edge Southeastern Power #4, 5	X			To ensure that those entities performing the Transmission Operator Function are validated.

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Lee Gladish CWLP #4	X			And thank you for adding this function to the organizational certification requirements.
Jim Griffith Southern Co #1	X			This function performs reliability operation functions which will require certification.
John Blazekovich Exelon #1, 3, 5, 6	X			Exelon believes that some form of certification should be required for Reliability Authorities, Interchange Authorities, Balance Authorities and Transmission Operator functions. We do not consider the certification process of functional roles as solely a "core reliability" issue, as such we believe the development of the certification process and criteria should be submitted to the NERC/NAESB JIC process so that the JIC can determine the best entity to define certification criteria.
The criteria contained within the SARs was drafted to support reliability of the interconnected North American grid, not to support business practices. The SAR, once fully developed, will go to the NERC/NAESB JIC to determine if the associated standard will be developed as a Business Practice by NAESB or as a Reliability Standard developed by NERC.				
Paul Elwing Lakeland Elec #3		X		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.
The changes to the Functional Model are not expected to significantly change the required 'capabilities' contained within the draft SARs. Even though we may need to make some minor adjustments to the certification requirements as a result of the FMRTG, there seems to be industry consensus on the need to make a start in developing these certification standards.				
MIPS & LTIS	X			Unanimous, and would like to have included clarification on how the area of a Transmission Operator would be defined
This SAR is addressing the certification of an entity to be a Balancing Authority, not defining how a BA acquires a physical territory.				
Linda Campbell for FRCC OC #1, 3,4,5		X		The SAR is premature 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 place on hold until such time that the reliability functions and relationships are clearly defined and understood by the industry.
The changes to the Functional Model are not expected to significantly change the required 'capabilities' contained within the draft SARs. Even though we may need to make some minor adjustments to the certification requirements as a result of the FMRTG, there seems to be industry consensus on the need to make a start in developing these certification standards.				
Ken Githens Allegheny #5	X			But, the certification process should not be a standard. The certification process could be covered by a business procedure.

<p>As stated in the Reliability Standard Manual, "... a procedure that must be followed as written must be incorporated into a Reliability Standard. " There does not appear to be anything to gain by separating the process out from the criteria and putting them in separate SARs. By having them combined, in a single SAR, uniformity between the process and criteria can be maintained. Since it is important that certifications be carried out in the same manner across North America, the procedures are appropriately included in the standard. We are seeking additional industry input into the separation of the process and the criteria. This additional input is expected to provide guidance for the future paths of the SAR.</p>				
Gordon Pietsch Great River Energy #1	X			<p>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.</p>
<p>As it is envisioned the standards would evolve independent of the certification criteria but would not preclude the entity from adhering them. The SAR DT is adding a step that covers the concern of evolving standards and is asking the industry for affirmation.</p>				
Art Giardino PSE&G #1		X		<p>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.</p>
<p>Existing Control Area certification focuses on both 'readiness to perform reliably' and 'performing reliably' and the existing compliance program also assesses 'performing reliably'. The new functional certification focuses solely on 'readiness to perform reliably' and leaves assessment of the 'performing reliably' portion to the compliance enforcement program. With the transition away from control areas, there is a need to put together a functional certification process that can be used by the industry in the near term. Even though we may need to make some adjustments to the certification requirements as we progress, there seems to be industry consensus on the need to make a start in developing these certification standards.</p>				
John Stickley Assoc Elec Coop #1	X			<p>Certification of the Transmission Operator function is necessary from a reliability perspective. However, AECI 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.</p>
<p>Existing Control Area certification focuses on both 'readiness to perform reliably' and 'performing reliably' and the existing compliance program also assesses 'performing reliably'. The new functional certification focuses solely on 'readiness to perform reliably' and leaves assessment of the 'performing reliably' portion to the compliance enforcement program. With the transition away from control areas, there is a need to put together a functional certification process that can be used by the industry in the near term. Even though we may need to make some adjustments to the certification requirements as we progress, there seems to be industry consensus on the need to make a start in developing these certification standards.</p>				

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Tony Jankowski We Energies #3, 4, 5	X			Should also include clarification on how the area of responsibility of the TOP is defined.
<p>The SAR currently defines the TOP to monitor and assess local reliability, operate the transmission facilities, and execute switching orders in support of the Reliability Authority. Additional clarification of the TOP can be obtained from the Functional Model</p>				
William Reinke SERC #2	X			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.
<p>The SAR, once fully developed, will go to the NERC/NAESB JIC to determine if the associated standard will be developed as a Business Practice by NAESB or as a Reliability Standard developed by NERC. As stated in the Reliability Standard Manual, "... a procedure that must be followed as written must be incorporated into a Reliability Standard. " There does not appear to be anything to gain by separating the process out from the criteria and putting them in separate SARs. By having them combined, in a single SAR, uniformity between the process and criteria can be maintained. Since it is important that certifications be carried out in the same manner across North America, the procedures are appropriately included in the standard. We are seeking additional industry input into the separation of the process and the criteria. This additional input is expected to provide guidance for the future paths of the SAR.</p>				
Paul Cafone PSE&G #1	X			<p>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?</p>

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The OCTF is developing a registration process whereby entities register with NERC to identify the function(s) that entity wants to perform. Your comments regarding the registration process will be forwarded to the OCTF.

Regarding Paragraph 10: The determination of what type of organization should lead the certification process is being determined through the industry's comments on these SARs.

Regarding Paragraph 12: The details of the measures included in the standard will address these issues. These details will be developed by the Standards Drafting Team.

William Smith Allegheny #1	X			
William Pope Gulf Power #3		X		
Ray Morella First Energy #1	X			
Andrew Wilcox NB Power #1	X			
Alan Johnson Mirant #6	X			
Ed Groce Avista #5	X			
James Regg TVA #1	X			
Walter Cintron Con Ed #1	X			
Karl Kohlrus CWLP #5	X			
Peter Burke [submitting responses for ATC's Alan Staats, Paul Steinberger, and Bobbi Welch] ATC #1	X			
Tom Pruitt Duke Energy Grid #1	X			
Roman Carter for Tony Reed Southern Co Gen & Mktg #3, 5, 6	X			
Kathleen Goodman ISO NE #2	X			
Gerald Rheault Manitoba Hydro #1, 3, 5	X			
Ray Gross PJM #2	X			

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Roger Green SOCO Generation #5	X			
George Bartlett Entergy #1, 3, 5	X			
Jim Cyrulewski, International Transmission Company#1	X			
Dave Christiano City Util of Springfield # 3	X			
Ed Riley CAISO #2	X			

2. Who should certify the Transmission Operator function?

Summary Consideration: The comments submitted indicate some misunderstandings about the certification process. As currently envisioned, the certification process will be supported by a team that includes several voting members, and all team members will have an equal vote in determining whether or not to grant certification. The consensus of the industry's comments indicated that all affected Regions should be involved, but that one of those Regions should take the lead in coordinating the effort. The SAR DT has modified the SAR based on the information received and is seeking additional industry input for clarification.

Commenter	Region	NERC	RTO	Ind Team	Comments
	22	16	6	2	
Ken Githens Allegheny #5				X	The independent team should be composed of representatives from NERC, NAESB, and possibly RTO/ISO's. Certifying entities need to certify not only reliability standards but also the associated market/commercial standards. All certifications would be completed at the same time.
The SAR DT feels that some confusion may exist due to the way the questions were presented. The SAR DT is trying to gain industry consensus by clarifying the SAR and re-posting for additional industry input.					
Martin Boisvert HQ #1					Refer to Question 1 {TOP_1. 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. <i>The Transmission operator performs his reliability activities under the responsibility and supervision of the Reliability Coordinator. }</i>
The criteria for certified personnel are under the responsibility of the Personnel Subcommittee. Your concerns will be forwarded to the PS for consideration. The Functional Model does indicate that the Transmission Operator should have certified System Operators.					
Michael Desselle AEP #1					see comments to no. 1 above {TOP_1. 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

				<p>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:</p> <ol style="list-style-type: none"> 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 critical to ensuring operating reliability and minimizing congestion, the Task Force also believes that the organization serving as the TSP function should be certified. <p>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.</p>
<p>The criteria for certified personnel are under the responsibility of the Personnel Subcommittee. Your concerns will be forwarded to the PS for consideration.</p> <p>The original criteria that was established by the OCTF was based on certifying the RA, BA, IA, TSP which were all identified in the Functional Model. When the OCTF held their workshops on the criteria contained in the Organization Certification White Paper, industry response received at the workshops and comments received from the posting indicated an industry consensus that it was the TOP that should be certified instead of the TSP. It was at that time that the OCTF developed the criteria for the TOP and dropped all efforts to certify the TSP. The Functional Model does indicate that the Transmission Operator should have certified System Operators.</p>				
Jim Griffith Southern Co #1	X			If the RTO is in place, it should be involved in this process.
Ray Gross PJM #2		X	X	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

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					<p>NERC and/or the Region(s) within which they operate.</p> <p>System operators employed by a Transmission Operator entity and directly responsible for conforming with NERC policies need to be NERC certified.</p> <p>System operators employed by entities which operate at the direction of an RTO need to be certified by that RTO.</p>
<p>The criteria for certified personnel are under the responsibility of the Personnel Subcommittee. Your concerns will be forwarded to the PS for consideration. Your comments are assuming that all RTOs would have a System Operator certification program. At this point in time, not all Regions have certification programs and if this trend were to carry forward into the RTO model, there would be some areas within the Interconnections without certified operators.</p>					
AL DiCaprio MAAC #2					<p>See comment 1</p> <p><i>(TOP_1. The Model defines the T-Oper function for the entity that physically "operates the transmission facilities, and executes switching orders."</i></p> <p><i>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.</i></p> <p><i>In short, it would appear that as defined in the Model, the T-Oper does not have to be certified on standards.}</i></p>
<p>The original criteria that was established by the OCTF was based on certifying the RA, BA, IA, TSP which were all identified in the Functional Model. When the OCTF held their workshops on the criteria contained in the Organization Certification White Paper, industry response received at the workshops and comments received from the posting indicated an industry consensus that it was the TOP that should be certified instead of the TSP. It was at that time that the OCTF developed the criteria for the TOP and dropped all efforts to certify the TSP. The Functional Model does indicate that the Transmission Operator should have certified System Operators.</p>					
Roger Green SOCO Generation #5	X				<p>Each Region should already have the fundamental structure / organization, collective expertise, reliability knowledge and experience, and representation among its members to handle this appropriately.</p>
Jim Cyrulewski, ITC #1			X		<p>RTO is preferred, but for those Transmission Operators not in an RTO then the Region should do the certification</p>
Paul Cafone PSE&G #1			X		<p>The RTO which is beholdng 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.</p>
<p>The SAR DT feels that some confusion may exist due to the way the questions were presented. The SAR DT is trying to gain industry consensus by clarifying the SAR and re-posting for additional industry input.</p>					

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Ed Riley CAISO #2	X	X			NERC should be the certifying body when regional boundaries are exceeded by any "authority".
<p>The SAR DT feels that some confusion may exist due to the way the questions were presented. The SAR DT is trying to gain industry consensus by clarifying the SAR and re-posting for additional industry input.</p>					
John Blazekovich Exelon #1, 3, 5, 6					After the certification process and criteria is determined by the appropriate NERC/NAESB process and directed by the NERC NAESB JIC, the question of "who should certify" may become self-evident or may require further industry discussion on the appropriate certification body. We would encourage discussion among the industry (stakeholders) to determine the appropriate certifying agency(s).
<p>The SAR, once fully developed, will go to the NERC/NAESB JIC to determine if the associated standard will be developed as a Business Practice by NAESB or as a Reliability Standard developed by NERC.</p>					
MIPS & LTIS		X			<p>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.</p> <p>Additionally, the MIPS believes that there should be a separate SAR/Standard that would establish a process for conducting all certification activities.</p>
<p>As currently envisioned, the certification process will be supported by a team that includes several voting members, and all team members will have an equal vote in determining whether or not to grant certification. The consensus of the industry's comments indicated that all affected Regions should be involved, but that one of those Regions should take the lead in coordinating the effort.</p> <p>The determination of what type of organization should do the certification process is being determined through the industry's comments on these SARs.</p> <p>The OCTF included the certification process in the SAR because the industry requested (during industry workshops) that the certification process be addressed consistently across Regional Boundaries. The only way to ensure that a process be followed consistently is to include the process within the standard. We will ask the industry to confirm that the process should be applied consistently across regional boundaries by being included in the SAR and associated Standard.</p>					
Linda Campbell for FRCC OC #1, 3,4,5	X				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

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					as long as it is fair and balanced. It should NOT be determined by NERC.
The determination of what type of organization should lead the certification process is being determined through the industry's comments on these SARs.					
Art Giardino PSE&G #1			X		Any transmission operation certification should be handled by the cognizant RTO.
The determination of what type of organization should lead the certification process is being determined through the industry's comments on these SARs.					
Peter Burke [submitting responses for ATC's Alan Staats, Paul Steinberger, and Bobbi Welch] ATC #1	X	X	X		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 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.
As currently envisioned, the certification process will be supported by a team that includes several voting members, and all team members will have an equal vote in determining whether or not to grant certification. The consensus of the industry's comments indicated that all affected Regions should be involved, but that one of those Regions should take the lead in coordinating the effort.					
The certification SARs do not currently contain any Regional Differences but these may exist in the future. We will ask the industry for confirmation that if a BA is certified and will operate in multiple Regions, the most stringent Region's Regional Difference within the Certification Standard will be applied.					
The determination of what type of organization should lead the certification process is being determined through the industry's comments on these SARs.					

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Carter B. Edge Southeastern Power #4, 5	X				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.
<p>As currently envisioned, the certification process will be supported by a team that includes several voting members, and all team members will have an equal vote in determining whether or not to grant certification. The consensus of the industry's comments indicated that all affected Regions should be involved, but that one of those Regions should take the lead in coordinating the effort.</p> <p>The certification SARs do not currently contain any Regional Differences but these may exist in the future. We will ask the industry for confirmation that if a BA is certified and will operate in multiple Regions, the most stringent Region's Regional Difference within the Certification Standard will be applied.</p> <p>The determination of what type of organization should lead the certification process is being determined through the industry's comments on these SARs.</p>					
Roman Carter for Tony Reed Southern Co Gen & Mktg #3, 5, 6	X				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.
<p>The determination of what type of organization should lead the certification process is being determined through the industry's comments on these SARs.</p>					
Tom Pruitt Duke Energy Grid #1		X			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.
<p>The determination of what type of organization should lead the certification process is being determined through the industry's comments on these SARs.</p> <p>The certification SARs do not currently contain any Regional Differences but these may exist in the future. We will ask the industry for confirmation that if a TOP is certified and will operate in multiple Regions, the most stringent Region's Regional Difference within the Certification Standard will be applied.</p>					
Lee Gladish CWLP #4		X			Same as comments to the RA SAR. {RA_2. All regions should work in one unison effort to avoid duplication of effort}
<p>As currently envisioned, the certification process will be supported by a team that includes several voting members, and all team members will have an equal vote in determining whether or not to grant certification. The consensus of the industry's comments indicated that all affected Regions should be involved, but that one of those Regions should take the lead in coordinating the effort.</p>					
Gerald Rheault Manitoba Hydro #1, 3, 5		X			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

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					the Certification Criteria is applied uniformly in all regions.
<p>The determination of what type of organization should lead the certification process is being determined through the industry's comments on these SARs.</p>					
Tony Jankowski We Energies #3, 4, 5		X			<p>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.</p> <p>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).</p>
<p>The determination of what type of organization should lead the certification process is being determined through the industry's comments on these SARs.</p> <p>The certification SARs do not currently contain any Regional Differences but these may exist in the future. We will ask the industry for confirmation that if a BA is certified and will operate in multiple Regions, the most stringent Region's Regional Difference within the Certification Standard will be applied.</p>					
Barry Gee National Grid #1	X				
William Smith Allegheny #1	X				
David Little Nova Scotia #1,3,5	X				
Paul Elwing Lakeland Elec #3	X				
A. Ralf Rufrano NYPA #1	X				
John Muir Con Ed #1	X				
Andrew Wilcox NB Power #1	X				
Alan Johnson Mirant #6	X				
Ed Groce Avista #5	X				

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Guy Zito NPCC #2	X				
John Stickley Assoc Elec Coop #1	X				
George Bartlett Entergy #1, 3, 5	X				
Joseph Krupar FL Muni Pwr Agency #3	X				
William Reinke SERC #2	X				
Thomas J. Vandervort, Transmission Subcommittee Secretary #3, 5	X	X		X	
Karl Kohlrus CWLP #5		X			
James Regg TVA #1		X			
Walter Cintron Con Ed #1		X			
Ray Morella First Energy #1		X			
Alan Boesch NBPP #1		X			
Gordon Pietsch Great River Energy #1		X			
Dave Christiano City Util of Springfield # 3		X			
Kathleen Goodman ISO NE #2			X		

3. When we are certifying the TOP, please indicated how many of the adjacent TOPs should complete a questionnaire

Summary Consideration: There does not appear to be a clear industry consensus on this issue. Although the majority of comments support the concept of all adjacent TOPs completing a questionnaire, there is a strong minority that indicates some fair percentage of the adjacent TOPs is enough. The SAR DT will modify the procedure based on the comments received and seek industry input in the next posting period.

Commenter	All 22	Some Fair % 14	Comments - Suggestions on how to determine a fair percentage
Linda Campbell for FRCC OC #1, 3,4,5	X		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 SAR DT will modify the procedure based on the comments received and seek industry input in the next posting period.			
Carter B. Edge Southeastern Power #4, 5	X		If an adjacent transmission operator has reliability concerns, they should be allowed to voice them.
The SAR DT will modify the procedure based on the comments received and seek industry input in the next posting period.			
Tony Jankowski We Energies #3, 4, 5	X		Questionnaires should be sent to all affected parties -- including the TOP's, RA and all BA's.
The procedure currently allows for questionnaires to be sent to the RA, BA, TSPs, and adjacent TOPs. The SAR DT will modify the procedure based on the comments received and seek industry input in the next posting period.			
Jim Griffith Southern Co #1	X		All must be included.
Thomas J. Vandervort, Transmission Subcommittee Secretary #3, 5	X	X	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 SAR DT will modify the procedure based on the comments received and seek industry input in the next posting period.			
Peter Burke [submitting responses for ATC's Alan Staats, Paul Steinberger, and Bobbi Welch] ATC #1	X	X	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

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			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 SAR DT will modify the procedure based on the comments received and seek industry input in the next posting period.			
Barry Gee National Grid #1 David Little Nova Scotia #1,3,5 A. Ralf Rufrano NYPA #1 John Muir Con Ed #1 Guy Zito NPCC #2		X X X X X	National Grid (NPCC) (NYPA) recommends the greater of, 25% or 2 adjacent operators.
The SAR DT will modify the procedure based on the comments received and seek industry input in the next posting period.			
Andrew Wilcox NB Power #1		X	0% - Do not feel that it is necessary to question adjacent Transmission Operators as part of the certification process.
The SAR DT will modify the procedure based on the comments received and seek industry input in the next posting period.			
Alan Johnson Mirant #6		X	Randomly select a statistically valid sample of the adjacent TO's to complete the questionnaire.
The SAR DT will modify the procedure based on the comments received and seek industry input in the next posting period.			
Ed Groce Avista #5		X	50% not to exceed 6
The SAR DT will modify the procedure based on the comments received and seek industry input in the next posting period.			
Art Giardino PSE&G #1			None, NERC shouldn't be doing this.
The SAR DT will modify the procedure based on the comments received and seek industry input in the next posting period.			
Lee Gladish CWLP #4		X	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 SAR DT will modify the procedure based on the comments received and seek industry input in the next posting period.			
James Regg TVA #1		X	20% would be a fair representation of the group.

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The SAR DT will modify the procedure based on the comments received and seek industry input in the next posting period.			
Gordon Pietsch Great River Energy #1			75
The SAR DT will modify the procedure based on the comments received and seek industry input in the next posting period.			
Joseph Krupar FL Muni Pwr Agency #3			Only adjacent bulk electric power system Transmission Operators.
The SAR DT will modify the procedure based on the comments received and seek industry input in the next posting period.			
Gerald Rheault Manitoba Hydro #1, 3, 5			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 SAR DT will modify the procedure based on the comments received and seek industry input in the next posting period.			
AL DiCaprio MAAC #2			See comment 1 <i>(TOP_1. 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.)</i>
The original criteria that was established by the OCTF was based on certifying the RA, BA, IA, TSP which were all identified in the Functional Model. When the OCTF held their workshops on the criteria contained in the Organization Certification White Paper, industry response received at the workshops and comments received from the posting indicated an industry consensus that it was the TOP that should be certified instead of the TSP. It was at that time that the OCTF developed the criteria for the TOP and dropped all efforts to certify the TSP.			
Martin Boisvert HQ #1			Refer to Question 1 <i>{TOP_1. 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. }</i>

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The criteria for certified personnel are under the responsibility of the Personnel Subcommittee. Your concerns will be forwarded to the PS for consideration.			
Karl Kohlrus CWLP #5	X		
George Bartlett Entergy #1, 3, 5	X		
Jim Cyrulewski, International Transmission Company #1	X		
William Reinke SERC #2	X		
Paul Cafone PSE&G #1	X		All means ALL
Ed Riley CAISO #2	X		
William Smith Allegheny #1	X		
Paul Elwing Lakeland Elec #3	X		
Ray Morella First Energy #1	X		
Alan Boesch NBPP #1	X		
Walter Cintron Con Ed #1	X		
Tom Pruitt Duke Energy Grid #1	X		
Roman Carter for Tony Reed Southern Co Gen & Mktg #3, 5, 6	X		
John Stickleby Assoc Elec Coop #1	X		
Ray Gross PJM #2	X		
Roger Green SOCO Generation #5	X		
Dave Christiano City Util of Springfield # 3		X	
Ken Githens Allegheny #5		X	

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

Summary Consideration: The comments do not indicate there is industry consensus on this issue. The SAR DT has made some modification to the SAR based on comments received and will seek additional industry input in an attempt to gain consensus. The modification to the SAR include a clarification of how the team would be assembled in multi-regional certification and also the inclusion of additional team members that have been suggested through the comment process. The criteria used for certifying the TOP would involve a single set of criteria. The only condition under which there would be a variation to the TOP certificate from Region to Region would be if there were any approved Regional Differences included in the TOP Certification Standard.

Commenter	Yes 23	No 17	Comments
Barry Gee National Grid #1 David Little Nova Scotia #1,3,5 A. Ralf Rufrano NYPA #1 John Muir Con Ed #1 Guy Zito NPCC #2	X X X X		If this question refers to categories yes-the categories are appropriate. National Grid (NPCC) (NYPA) 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 (NPCC) (NYPA) feels there should be a minimum of one representative from each of the four categories, IA,RA,BA, and TO.
There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.			
William Smith Allegheny #1	X		Minimum credentials should be established for the selection of Review Team Members.
James Regg TVA #1	X		The listed positions make up a fair group from TVA's perspective.
Thomas J. Vandervort, Transmission Subcommittee Secretary #3, 5	X		3 - Yes, 0 - No 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.

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<p>There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.</p>			
<p>Peter Burke [submitting responses for ATC's Alan Staats, Paul Steinberger, and Bobbi Welch] ATC #1</p>	<p>X</p>		<p>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.</p>
<p>There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.</p>			
<p>Lee Gladish CWLP #4</p>	<p>X</p>		<p>Same as my comments to the RA SAR. <i>{RA_4 . A mandatory "outsider" should be on the review team, such as a rep from NERC staff, or another Region.}</i></p>
<p>There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.</p>			
<p>Gordon Pietsch Great River Energy #1</p>	<p>X</p>		<p>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.</p>
<p>There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.</p>			
<p>Kathleen Goodman ISO NE #2</p>	<p>X</p>	<p>X</p>	<p>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.</p>
<p>In accordance with step 9 in the procedure, both the Region and the applicant must approve the review team. Issues such as these identified should be handled at this point of the process.</p>			
<p>Paul Elwing Lakeland Elec #3</p>		<p>X</p>	<p>LSE's that are served by the TOp should be included as they are affected by TOp's action</p>

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<p>There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.</p>			
MIPS & LTIS		X	<p>This question appears to assume the answer to the previous question has already been determined that the Region conducts the certification.</p> <p>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.</p> <p>The certification process should clearly explain what would constitute consensus.</p> <p>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.</p>
<p>There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.</p>			
John Blazekovich Exelon #1, 3, 5, 6		X	<p>Cannot be determined at this point. In order to determine the proper certification agency, industry stakeholders should consider independence, credibility, and efficiency in choosing the appropriate certification body.</p>
<p>The SAR, once fully developed, will go to the NERC/NAESB JIC to determine if the associated standard will be developed as a Business Practice by NAESB or as a Reliability Standard developed by NERC.</p>			
Alan Boesch NBPP #1		X	<p>Independent team guided by NERC would be the best combination</p>
<p>The current procedure for certifying the TOP allows for the Region to engage a completely independent team as identified in step 10 of the procedure. The SAR DT feels that some confusion may exist due to the way the questions were presented. The SAR DT is trying to gain industry consensus by clarifying the SAR and re-posting for additional industry input.</p>			
Linda Campbell for FRCC OC #1, 3,4,5		X	<p>Since transmission operators can direct Distribution providers to interrupt customers, should a distribution provider be one of the categories? Also, a representative from the Regional staff should also be included.</p>
<p>There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.</p>			

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Ken Githens Allegheny #5		X	<p>See comment for question 3.</p> <p><i>{TOP_2. 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.}</i></p>
<p>The current procedure for certifying the TOP allows for the Region to engage a completely independent team as identified in step 10 of the procedure. The SAR DT feels that some confusion may exist due to the way the questions were presented. The SAR DT is trying to gain industry consensus by clarifying the SAR and re-posting for additional industry input.</p>			
<p>The current SARs only address certification of an entity performing a function from a reliability perspective. They are not intended to address market/commercial standards. It is also envisioned that when an entity is performing multiple functions, it would be more efficient for all of the certifications for the functions being performed (reliability), be done at the same time.</p>			
Art Giardino PSE&G #1		X	<p>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.</p>
<p>There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.</p>			
Carter B. Edge Southeastern Power #4, 5		X	<p>The Regions are best suited to certify entities. The NERC should continue to develop the Standards to which the functions operate.</p>
<p>There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.</p>			
Tom Pruitt Duke Energy Grid #1		X	<p>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.</p>
<p>There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.</p>			
Roman Carter for Tony Reed Southern Co Gen & Mktg #3, 5, 6		X	<p>The Review Team above is heavily weighted with Reliability function entites. 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.</p>

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<p>There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.</p>			
<p>Gerald Rheault Manitoba Hydro #1, 3, 5</p>		<p>X</p>	<p>Manitoba Hydro believes that this issue does not belong in the Standard as discussed in detail in the question 6 comment.</p> <p>However, since there will be a requirement to address the issue of Review Team membership in an administrative document relative to this Standard, following is Manitoba Hydro's comments relative to the composition of the Review Team. The review team should be composed of three members. These members should be selected from the following categories:</p> <ol style="list-style-type: none"> 1. NERC staff. 2. Region staff. 3. an independent organization who has expertise in conducting this type of review <p>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.</p> <p>The review team should not include representation from certified authorities or RTO staff because of possible conflict of interest issues.</p>
<p>There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.</p>			
<p>Tony Jankowski We Energies #3, 4, 5</p>		<p>X</p>	<p>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.</p> <p>The certification process should clearly define what constitutes consensus. The review team must be composed of representatives of members from each applicable type of authority and function that is immediately and directly affected by the activities and functions of the organization being certified.</p>
<p>There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.</p>			
<p>Roger Green SOCO Generation #5</p>		<p>X</p>	<p>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</p>

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			or Working Group that would be involved in the certification process because the Generator is a fundamental component of the NERC Functional Model.
There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.			
George Bartlett Entergy #1, 3, 5		X	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.
There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form. In accordance with step 9 in the procedure, both the Region and the applicant must approve the review team. Issues such as these identified should be handled at this point of the process.			
Paul Cafone PSE&G #1		X	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% ?
There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.			
Ed Riley CAISO #2		X	The reviewing parties must have some expertise in the functions,roles, and responsibilities of the "authority" to be reviewed; it doesn't really matter what category they come from. There should always be a fourth individual from the NERC staff on each review team to ensure consistency and objectivity. The CISO believes it is inappropriate for a region to engage an independent review team - NERC should be the certifying body if the region doesn't want to do it.
There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.			
Joseph Krupar FL Muni Pwr Agency #3			The Transmission Operator should be changed to the bulk electric power system Transmission Operator.
The criteria for certifying the TOP was based on the Transmission Operator as defined in the Functional Model. The Functional Model did not specifically identify 'bulk electric power system'. The SAR DT will consider your comments in modifications to the SAR.			
Michael Desselle AEP #1			see comments to no. 1 above <i>{TOP_1. . . . Therefore, we do not believe it appropriate to require a certification procedure</i>

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			<i>for the Transmission Operator. Accordingly, we have not commented on the rest of this SAR.}</i>
<p>The criteria for certified personnel are under the responsibility of the Personnel Subcommittee. Your concerns will be forwarded to the PS for consideration.</p> <p>The original criteria that was established by the OCTF was based on certifying the RA, BA, IA, TSP which were all identified in the Functional Model. When the OCTF held their workshops on the criteria contained in the Organization Certification White Paper, industry response received at the workshops and comments received from the posting indicated an industry consensus that it was the TOP that should be certified instead of the TSP. It was at that time that the OCTF developed the criteria for the TOP and dropped all efforts to certify the TSP.</p>			
AL DiCaprio MAAC #2			<p>See comment 1</p> <p><i>(TOP_1. The Model defines the T-Oper function for the entity that physically "operates the transmission facilities, and executes switching orders."</i></p> <p><i>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.</i></p> <p><i>In short, it would appear that as defined in the Model, the T-Oper does not have to be certified on standards.}</i></p>
<p>The original criteria that was established by the OCTF was based on certifying the RA, BA, IA, TSP which were all identified in the Functional Model. When the OCTF held their workshops on the criteria contained in the Organization Certification White Paper, industry response received at the workshops and comments received from the posting indicated an industry consensus that it was the TOP that should be certified instead of the TSP. It was at that time that the OCTF developed the criteria for the TOP and dropped all efforts to certify the TSP.</p>			
Martin Boisvert HQ #1			<p>Refer to Question 1</p> <p><i>{TOP_1. 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.</i></p> <p><i>The Transmission operator performs his reliability activities under the responsibility and supervision of the Reliability Coordinator. }</i></p>
<p>The criteria for certified personnel are under the responsibility of the Personnel Subcommittee. Your concerns will be forwarded to the PS for consideration.</p>			
Ray Morella First Energy #1	X		
Andrew Wilcox NB Power	X		

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#1			
Jim Cyrulewski, International Transmission Company#1	X		
Dave Christiano City Util of Springfield # 3	X		
William Reinke SERC #2	X		
John Sticklely Assoc Elec Coop #1	X		
Jim Griffith Southern Co #1	X		
Walter Cintron Con Ed #1	X		
Karl Kohlrus CWLP #5	X		
Alan Johnson Mirant #6	X		
Ed Groce Avista #5	X		

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

Summary Consideration: There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.

Commenter	Yes	No	Comments
MIPS & LTIS	X		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.
There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.			
Alan Boesch NBPP #1	X		See previous <i>{TOP_4. Independent team guided by NERC would be the best combination}</i>
There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.			
James Regg TVA #1	X		Only if he/she meets qualifications to understand the position.
Peter Burke [submitting responses for ATC's Alan Staats, Paul Steinberger, and Bobbi Welch] ATC #1	X		To the extent that multiple Regions are involved, a NERC staff person should be involved to ensure consistency.
There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.			
Tom Pruitt Duke Energy Grid #1	X		See comments for question 4. <i>{TOP_4. 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.}</i>
There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.			

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Roman Carter for Tony Reed Southern Co Gen & Mktg #3, 5, 6	X		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.
<p>There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.</p>			
Gerald Rheault Manitoba Hydro #1, 3, 5	X		<p>Refer to question 4 and question 6 comments.</p> <p><i>{TOP4. Manitoba Hydro believes that this issue does not belong in the Standard as discussed in detail in the question 6 comment.</i></p> <p><i>However, since there will be a requirement to address the issue of Review Team membership in an administrative document relative to this Standard, following is Manitoba Hydro's comments relative to the composition of the Review Team. The review team should be composed of three members. These members should be selected from the following categories:</i></p> <ol style="list-style-type: none"> <i>1. NERC staff.</i> <i>2. Region staff.</i> <i>3. an independent organization who has expertise in conducting this type of review</i> <p><i>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.</i></p> <p><i>The review team should not include representation from certified authorities or RTO staff because of possible conflict of interest issues.</i></p> <p><i>{TOP_6. Maitoba Hydro believes that the entire section entitled "Detailed Description of New Standard or Revision to Existing Standard" should be removed from the SAR. The SAR documentation should only start at the section entitled "Reliability Authority Certification Criteria". The Standard which will be produced from this SAR should only deal with "Criteria" and not "Process".</i></p> <p><i>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.}</i></p>
<p>There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.</p>			

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Tony Jankowski We Energies #3, 4, 5	X		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.
There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.			
Roger Green SOCO Generation #5	X		Having a NERC staff person involved to help facilitate the process should help complete the process more quickly and avoid certain pitfalls.
There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.			
Jim Cyrulewski, International Transmission Company#1	X		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?
There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.			
Ed Riley CAISO #2	X		See 4. above. <i>{TOP_4. The reviewing parties must have some expertise in the functions,roles, and responsibilities of the "authority" to be reviewed; it doesn't really matter what category they come from. There should always be a fourth individual from the NERC staff on each review team to ensure consistency and objectivity. The CISO believes it is inappropriate for a region to engage an independent review team - NERC should be the certifying body if the region doesn't want to do it.}</i>
There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.			
Lee Gladish CWLP #4	X	X	Same as my comments to the RA SAR. <i>{RA_ 5. See comments to #4. Just so an outsider is involved. {RA_ 4. A mandatory "outsider" should be on the review team, such as a rep from NERC staff, or another Region.}</i>
There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.			

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Thomas J. Vandervort, Transmission Subcommittee Secretary #3, 5	X	X	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.
There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.			
John Stickley Assoc Elec Coop #1		X	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.
There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.			
Art Giardino PSE&G #1		X	Certification of a Transmission Operating Organization (vs. personnel operating transmission) is not a core reliability function and is out of NERC scope.
The SAR DT will modify the procedure based on the comments received and seek industry input in the next posting period.			
William Reinke SERC #2		X	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.
There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.			
Paul Cafone PSE&G #1		X	It will simply drive up the COST to all participants
There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.			
Alan Johnson Mirant #6		X	Don't think its necessary to have a NERC staff person 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.

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<p>There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.</p>			
John Blazekovich Exelon #1, 3, 5, 6		X	Cannot be determined at this point.
Barry Gee National Grid #1 David Little Nova Scotia #1,3,5 A. Ralf Rufrano NYPA #1 B. John Muir Con Ed #1 C. Guy Zito NPCC #2		X	Possibly when the BA spans more than one Region, and as a non-voting facilitator.
<p>There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.</p>			
William Smith Allegheny #1		X	NERC Staff should review the certification decision for consistency.
<p>There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.</p>			
Carter B. Edge Southeastern Power #4, 5		X	This would be unnecessary as the Regions would follow the NERC process for certification.
<p>There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.</p>			
Andrew Wilcox NB Power #1		X	Possibly when the Reliability Authority spans more than one Region.
<p>There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.</p>			
Linda Campbell for FRCC OC #1, 3,4,5			So that consistency between regions is considered, it may be appropriate to include a NERC staff (as a non-voting member) on the review team if desired by the Region(s); however the

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			Region(s) should lead the review and not NERC.I
<p>There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.</p>			
Paul Elwing Lakeland Elec #3			Only as an ad-hoc member, no voting authority
<p>There appeared to be no industry consensus with regards to this question. The SAR DT is requesting additional industry input due to the confusion that appears to exist with this issue. There have been modifications made to the SAR and additional comments posed in the comment form.</p>			
Michael Desselle AEP #1			<p>see comments to no. 1 above</p> <p><i>{TOP_1. . . . 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.}</i></p>
<p>The criteria for certified personnel are under the responsibility of the Personnel Subcommittee. Your concerns will be forwarded to the PS for consideration.</p> <p>The original criteria that was established by the OCTF was based on certifying the RA, BA, IA, TSP which were all identified in the Functional Model. When the OCTF held their workshops on the criteria contained in the Organization Certification White Paper, industry response received at the workshops and comments received from the posting indicated an industry consensus that it was the TOP that should be certified instead of the TSP. It was at that time that the OCTF developed the criteria for the TOP and dropped all efforts to certify the TSP.</p>			
Martin Boisvert HQ #1			<p>Refer to Question 1</p> <p><i>{TOP_1. 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.</i></p> <p><i>The Transmission operator performs his reliability activities under the responsibility and supervision of the Reliability Coordinator. }</i></p>
<p>The criteria for certified personnel are under the responsibility of the Personnel Subcommittee. Your concerns will be forwarded to the PS for consideration.</p>			
AL DiCaprio MAAC #2			<p>See comment 1</p> <p><i>(TOP_1. The Model defines the T-Oper function for the entity that physically "operates the transmission facilities, and executes switching orders."</i></p> <p><i>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</i></p>

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			<p><i>not need to be standard savvy, it only needs to have a contractual responsibility to carry out the directives of the RA.</i></p> <p><i>In short, it would appear that as defined in the Model, the T-Oper does not have to be certified on standards.}</i></p>
<p>The original criteria that was established by the OCTF was based on certifying the RA, BA, IA, TSP which were all identified in the Functional Model. When the OCTF held their workshops on the criteria contained in the Organization Certification White Paper, industry response received at the workshops and comments received from the posting indicated an industry consensus that it was the TOP that should be certified instead of the TSP. It was at that time that the OCTF developed the criteria for the TOP and dropped all efforts to certify the TSP.</p>			
Kathleen Goodman ISO NE #2	X		
Walter Cintron Con Ed #1	X		
Karl Kohlrus CWLP #5	X		
Dave Christiano City Util of Springfield # 3	X		
Gordon Pietsch Great River Energy #1	X		
Ed Groce Avista #5	X		
Jim Griffith Southern Co #1	X		
Ray Morella First Energy #1	X		
Ken Githens Allegheny #5		X	
George Bartlett Entergy #1, 3, 5		X	
Joseph Krupar FL Muni Pwr Agency #3		X	

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.

Commenter	Yes	No	Comments
Michael Desselle AEP #1			see comments to no. 1 above <i>{TOP_1. . . . 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.}</i>
<p>The criteria for certified personnel are under the responsibility of the Personnel Subcommittee. Your concerns will be forwarded to the PS for consideration.</p> <p>The original criteria that was established by the OCTF was based on certifying the RA, BA, IA, TSP which were all identified in the Functional Model. When the OCTF held their workshops on the criteria contained in the Organization Certification White Paper, industry response received at the workshops and comments received from the posting indicated an industry consensus that it was the TOP that should be certified instead of the TSP. It was at that time that the OCTF developed the criteria for the TOP and dropped all efforts to certify the TSP.</p>			
AL DiCaprio MAAC #2			See comment 1 <i>(TOP_1. The Model defines the T-Oper function for the entity that physically "operates the transmission facilities, and executes switching orders."</i> <i>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.</i> <i>In short, it would appear that as defined in the Model, the T-Oper does not have to be certified on standards.}</i>
<p>The original criteria that was established by the OCTF was based on certifying the RA, BA, IA, TSP which were all identified in the Functional Model. When the OCTF held their workshops on the criteria contained in the Organization Certification White Paper, industry response received at the workshops and comments received from the posting indicated an industry consensus that it was the TOP that should be certified instead of the TSP. It was at that time that the OCTF developed the criteria for the TOP and dropped all efforts to certify the TSP.</p>			
Martin Boisvert HQ #1	X		Refer to Question 1 <i>{TOP_1. 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.</i> <i>The Transmission operator performs his reliability activities under the responsibility and</i>

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			<i>supervision of the Reliability Coordinator. }</i>
<p>The criteria for certified personnel are under the responsibility of the Personnel Subcommittee. Your concerns will be forwarded to the PS for consideration.</p>			
Paul Cafone PSE&G #1	X		Much of what is included is ill defined and subject to individual interpretation .
Tony Jankowski We Energies #3, 4, 5	X		<p>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.</p> <p>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).</p> <p>The process assumes that the IDC continues to exist. This should be removed.</p> <p>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.</p>
<p>The determination of what type of organization should lead the certification process is being determined through the industry's comments on these SARs.</p> <p>The intent of allowing the applicant approval of the review team was to ensure that the team did not include any individuals who the applicant felt provided a biased evaluation. This process currently exists in the current control area certification and has never been questioned. The applicant is not selecting the review team, they are only approving them.</p> <p>The SAR will be modified to change IDC to a more generic term that indicates data needed for modeling will be provided to NERC.</p> <p>We will ask the industry for feedback on the appropriate timeframe. The current control area certification has a six month timeframe. The OCTF tried to start with a timeframe that seemed feasible, given the expected increase in work load associated with the new certifications.</p>			
John Blazekovich Exelon #1, 3, 5, 6	X		Because Exelon does not see this issue solely as a "core reliability" issue and believe the certification criteria and process should be defined by the appropriate NERC and or NAESB process. We believe it is premature for NERC to define the process at this time.
<p>The criteria contained within the SARs was drafted to support reliability of the interconnected North American grid, not to support business practices. The SAR, once fully developed, will go to the NERC/NAESB JIC to determine if the associated standard will be developed as a Business Practice by NAESB or as a Reliability Standard developed by NERC.</p>			
Paul Elwing Lakeland Elec #3	X		Certification Process should be separate and stand-alone, not included in the SAR

<p>The OCTF included the certification process in the SAR because the industry requested (during industry workshops) that the certification process be addressed consistently across Regional Boundaries. The only way to ensure that a process be followed consistently is to include the process within the standard. We will ask the industry to confirm that the process should be applied consistently across regional boundaries by being included in the SAR and associated Standard.</p>			
MIPS & LTIS	X		<p>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.</p> <p>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)</p> <p>The process assumes that the IDC continues to exist; consequently, step 6 should be removed from the certification process.</p>
<p>The determination of what type of organization should do the certification process is being determined through the industry's comments on these SARs.</p> <p>The intent of allowing the applicant approval of the review team was to ensure that the team did not include any individuals who the applicant felt provided a biased evaluation. This process currently exists in the current control area certification and has never been questioned. The applicant is not selecting the review team, they are only approving them.</p> <p>The SAR will be modified to change IDC to a more generic term that indicates data needed for modeling will be provided to NERC.</p>			
Alan Boesch NBPP #1	X		<p>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.</p>
<p>This SAR includes some details that aren't in other SARs – this is because of some specific requests made by industry participants during Workshops. The standard drafting team will add even more specific requirements, measures and descriptions of expected performance/outcomes.</p>			
Linda Campbell for FRCC OC #1, 3,4,5	X		<p>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 itself. The certification process steps should be considered a supporting document as anticipated in the Reliability Standards Process Manual. Only the criteria for the BA 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.</p>

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<p>The OCTF that drafted the SAR asked the advice of NERC's legal counsel regarding whether to include the certification process within the Certification Standards. The response was that if a process/procedure must be followed by all entities in the same way, then the process/procedure must be included within the standard. The 'process' does not need to be included in the SAR, but does need to be included in the associated standard. The OCTF felt that without presenting the process, the industry would not have the information needed to understand how the process will be administered. During the workshops held by the OCTF, there were very clear directions to develop a process that was applied evenly from Region to Region.</p> <p>Regarding the request to develop an industry review process for items such as supporting documents - the RSPM indicates that supporting documents will be approved by the Standing Committees.</p>			
Kathleen Goodman ISO NE #2	X		Entities requiring appropriate conduct likely already bound by FERC Order 888 / 889. This is a duplicative effort and should not be included.
<p>FERC 888 and 889 only apply to FERC jurisdictional entities. The requirements contained in the 'organization' section of the SAR were intended to protect market sensitive reliability-related data.</p>			
Art Giardino PSE&G #1	X		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.
<p>As envisioned, an organization would apply for as many certifications as it desired. The SAR doesn't dictate what functions any organization can perform.</p>			
Dave Christiano City Util of Springfield # 3	X		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).
<p>This SAR includes some details that aren't in other SARs – this is because of some specific requests made by industry participants during Workshops. The standard drafting team will add even more specific requirements, measures and descriptions of expected performance/outcomes.</p>			
Joseph Krupar FL Muni Pwr Agency #3	X		Reference to the IDC should be removed in step 6. The phrase "for the IDC" should be removed in step 6.
<p>The SAR will be modified to change IDC to a more generic term that indicates data needed for modeling will be provided to NERC.</p>			
William Reinke SERC #2	X		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. <i>{TOP_5. 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</i>

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			<i>operations experience.}</i>
<p>The OCTF that drafted the SAR asked the advice of NERC's legal counsel regarding whether to include the certification process within the Certification Standards. The response was that if a process/procedure must be followed by all entities in the same way, then the process/procedure must be included within the standard. The 'process' does not need to be included in the SAR, but does need to be included in the associated standard. The OCTF felt that without presenting the process, the industry would not have the information needed to understand how the process will be administered. During the workshops held by the OCTF, there were very clear directions to develop a process that was applied evenly from Region to Region.</p>			
Gerald Rheault Manitoba Hydro #1, 3, 5	X		<p>Maitoba Hydro believes that the entire section entitled "Detailed Description of New Standard or Revision to Existing Standard" should be removed from the SAR. The SAR documentation should only start at the section entitled "Reliability Authority Certification Criteria". The Standard which will be produced from this SAR should only deal with "Criteria" and not "Process".</p> <p>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.</p>
<p>The OCTF included the certification process in the SAR because the industry requested (during industry workshops) that the certification process be addressed consistently across Regional Boundaries. The only way to ensure that a process be followed consistently is to include the process within the standard. We will ask the industry to confirm that the process should be applied consistently across regional boundaries by being included in the SAR and associated Standard.</p>			
Thomas J. Vandervort, Transmission Subcommittee Secretary #3, 5	X	X	<p>1 - Yes, 2 - No</p> <p>Comments: (1) Is it necessary to make changes to the IDC?</p> <p>(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.</p>
<p>The SAR will be modified to change IDC to a more generic term that indicates data needed for modeling will be provided to NERC. This SAR includes some details that aren't in other SARs – this is because of some specific requests made by industry participants during Workshops. The standard drafting team will add even more specific requirements, measures and descriptions of expected performance/outcomes.</p>			
Roman Carter for Tony Reed Southern Co Gen & Mktg #3, 5, 6		X	<p>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.</p>

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<p>If the need for a modification is identified during the SAR Drafting stage, the SAR DT can make modifications to the SAR. The scope of each standard must be defined within a SAR and once that SAR is approved to go to the standard drafting stage, additional changes to the scope of the SAR cannot be made without re-posting the SAR. Standards Drafting Teams are limited to developing details for requirements that have already been identified in the SAR. Once the standard is approved, modifications may be initiated to the standard by submitting a new SAR that indicates what changes are needed. The process for updating an approved standard is addressed in the RSPM.</p>			
Roger Green SOCO Generation #5		X	<p>See our response to Question 15.</p> <p><i>{TOP_15. 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.}</i></p>
<p>If the need for a modification is identified during the SAR Drafting stage, the SAR DT can make modifications to the SAR. The scope of each standard must be defined within a SAR and once that SAR is approved to go to the standard drafting stage, additional changes to the scope of the SAR cannot be made without re-posting the SAR. Standards Drafting Teams are limited to developing details for requirements that have already been identified in the SAR. Once the standard is approved, modifications may be initiated to the standard by submitting a new SAR that indicates what changes are needed. The process for updating an approved standard is addressed in the RSPM.</p>			
Barry Gee National Grid #1		X	
William Smith Allegheny #1		X	
David Little Nova Scotia #1,3,5		X	
A. Ralf Rufrano NYPA #1		X	
Ray Morella First Energy #1		X	
John Muir Con Ed #1		X	
Andrew Wilcox NB Power #1		X	
Alan Johnson Mirant #6		X	
Ken Githens Allegheny #5		X	

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Ed Groce Avista #5		X	
James Regg TVA #1		X	The Transmission Operator position is covered well.
Walter Cintron Con Ed #1		X	
Guy Zito NPCC #2		X	
Karl Kohlrus CWLP #5		X	
Peter Burke [submitting responses for ATC's Alan Staats, Paul Steinberger, and Bobbi Welch] ATC #1		X	
Carter B. Edge Southeastern Power #4, 5		X	
Tom Pruitt Duke Energy Grid #1		X	
Jim Griffith Southern Co #1		X	
Ray Gross PJM #2			
Ed Riley CAISO #2		X	
Lee Gladish CWLP #4		X	
John Stickleby Assoc Elec Coop #1		X	
Gordon Pietsch Great River Energy #1		X	
George Bartlett Entergy #1, 3, 5		X	
Jim Cyrulewski, International Transmission Company#1		X	

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.

Commenter	Yes	No	Comments
AL DiCaprio MAAC #2			<p>See comment 1</p> <p><i>(TOP_1. The Model defines the T-Oper function for the entity that physically "operates the transmission facilities, and executes switching orders."</i></p> <p><i>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.</i></p> <p><i>In short, it would appear that as defined in the Model, the T-Oper does not have to be certified on standards.}</i></p>
<p>The original criteria that was established by the OCTF was based on certifying the RA, BA, IA, TSP which were all identified in the Functional Model. When the OCTF held their workshops on the criteria contained in the Organization Certification White Paper, industry response received at the workshops and comments received from the posting indicated an industry consensus that it was the TOP that should be certified instead of the TSP. It was at that time that the OCTF developed the criteria for the TOP and dropped all efforts to certify the TSP.</p>			
Michael Desselle AEP #1			<p>see comments to no. 1 above</p> <p><i>{TOP_1. . . . 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.}</i></p>
<p>The criteria for certified personnel are under the responsibility of the Personnel Subcommittee. Your concerns will be forwarded to the PS for consideration.</p> <p>The original criteria that was established by the OCTF was based on certifying the RA, BA, IA, TSP which were all identified in the Functional Model. When the OCTF held their workshops on the criteria contained in the Organization Certification White Paper, industry response received at the workshops and comments received from the posting indicated an industry consensus that it was the TOP that should be certified instead of the TSP. It was at that time that the OCTF developed the criteria for the TOP and dropped all efforts to certify the TSP.</p>			
Martin Boisvert HQ #1	X		<p>Refer to Question 1</p> <p><i>{TOP_1. 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.</i></p> <p><i>The Transmission operator performs his reliability activities under the responsibility and</i></p>

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			<i>supervision of the Reliability Coordinator. }</i>
The criteria for certified personnel are under the responsibility of the Personnel Subcommittee. Your concerns will be forwarded to the PS for consideration.			
Barry Gee National Grid #1 David Little Nova Scotia #1,3,5 A. Ralf Rufrano NYPA #1 John Muir Con Ed #1 Guy Zito NPCC #2	X X X X		National Grid (NPCC) (NYPA) 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.
The criteria for certified personnel are under the responsibility of the Personnel Subcommittee. Your concerns will be forwarded to the PS for consideration.			
Tony Jankowski We Energies #3, 4, 5	X		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.
MIPS & LTIS	X		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.
As currently envisioned, questionnaires would be sent to all entities subordinate to the TOP. (item 7 in process)			
The certification process provides ample opportunity for those entities that could interact with the applicant. The need to post it to the industry-at-large does not appear to be warranted.			
Alan Johnson Mirant #6	X		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.

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<p>As currently envisioned, the certification process will be supported by a team that includes several voting members, and all team members will have an equal vote in determining whether or not to grant certification. The consensus of the industry's comments indicated that all affected Regions should be involved, but that one of those Regions should take the lead in coordinating the effort.</p> <p>We envisioned that the Region and the applicant would agree upon a 'start date' and would give this date to NERC. We will modify the SAR to clarify this.</p>			
Carter B. Edge Southeastern Power #4, 5	X		It is unclear how the "agreed upon date" is derived or who agrees on it for beginning Transmission Operations in step #17.
<p>As envisioned, the Region and the applicant would agree upon a 'start date' and would give this date to NERC. The SAR will be modified to clarify this.</p>			
Tom Pruitt Duke Energy Grid #1	X		To reiterate, NERC should lead the review and make the certification decision.
<p>There was no clear industry consensus on this issue. We have provided some additional information and are asking the industry to take another look at this part of the process.</p>			
Lee Gladish CWLP #4	X		Same as my comments to the RA SAR. <i>{RA_ Certification of personnel should include the requirement of the "appropriate" certification. IE: There are now multiple credentials, and the RA must have Personnel with RA credentials.}</i>
<p>The SAR will be revised to include specific language to more specifically indicate which system operator credentials are acceptable.</p>			
John Blazekovich Exelon #1, 3, 5, 6	X		Because Exelon does not see this issue solely as a "core reliability" issue and believe the certification criteria and process should be defined by the appropriate NERC and or NAESB process. We believe it is premature for NERC to define the process at this time.
<p>The criteria contained within the SARs was drafted to support reliability of the interconnected North American grid, not to support business practices. The SAR, once fully developed, will go to the NERC/NAESB JIC to determine if the associated standard will be developed as a Business Practice by NAESB or as a Reliability Standard developed by NERC.</p>			
Art Giardino PSE&G #1	X		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.

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<p>It is envisioned that if an entity applies for multiple functions, the certification process could be handled once and would address all required elements for the certifications.</p> <p>Development of a cost benefit analysis is outside the scope of the SAR DT.</p>			
Jim Cyrulewski, International Transmission Company#1	X		Scope change needs to be addressed when Transmission Owner expands into another RTO or Region and consolidates Transmission Operator operations into one location.
<p>This is a 're-certification' issue and will be forwarded to the OCTF.</p>			
William Reinke SERC #2	X		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.
<p>This issue will be posed to the industry in the next SAR posting period.</p>			
Paul Cafone PSE&G #1	X		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.
<p>Regional models must be updated to ensure that reliability analyses can be conducted. The revised SAR does not include a specific reference to the IDC, but does indicate that required data must be provided to support reliability models.</p> <p>Regional differences that are included in certification must be identified and approved by the industry as the SAR/standard is developed.</p> <p>Please provide specific suggestions on the size of the review team.</p> <p>Details on the requirements for the Control Center Facility or Staff will be addressed by the Standards Drafting Team.</p> <p>The expected performance (minimum requirements) will be developed by the Standards Drafting Team.</p>			
Jim Griffith Southern Co #1		X	Changes in the certification requirements should be addressed.
<p>If the need for a modification is identified during the SAR Drafting stage, the SAR DT can make modifications to the SAR. The scope of each standard must be defined within a SAR and once that SAR is approved to go to the standard drafting stage, additional changes to the scope of the SAR cannot be made without re-posting the SAR. Standards Drafting Teams are limited to developing details for requirements that have already been identified in the SAR. Once the standard is approved, modifications may be initiated to the standard by submitting a new SAR that indicates what changes are needed. The process for updating an approved standard is addressed in the RSPM.</p>			
Roman Carter for Tony Reed Southern Co Gen &		X	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

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Mktg #3, 5, 6			should be made in the SAR to permit enhancing or streamlining the certification process during development of the standard itself.
<p>If the need for a modification is identified during the SAR Drafting stage, the SAR DT can make modifications to the SAR. The scope of each standard must be defined within a SAR and once that SAR is approved to go to the standard drafting stage, additional changes to the scope of the SAR cannot be made without re-posting the SAR. Standards Drafting Teams are limited to developing details for requirements that have already been identified in the SAR. Once the standard is approved, modifications may be initiated to the standard by submitting a new SAR that indicates what changes are needed. The process for updating an approved standard is addressed in the RSPM.</p>			
Dave Christiano City Util of Springfield # 3		X	<p>See comment in #6 above.</p> <p><i>{TOP_6. 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).}</i></p>
<p>This SAR includes some details that aren't in other SARs – this is because of some specific requests made by industry participants during Workshops. The standard drafting team will add even more specific requirements, measures and descriptions of expected performance/outcomes.</p>			
Roger Green SOCO Generation #5		X	<p>None that we can think of at this stage. See our response to Question 15.</p> <p><i>{TOP_15. 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.}</i></p>
<p>If the need for a modification is identified during the SAR Drafting stage, the SAR DT can make modifications to the SAR. The scope of each standard must be defined within a SAR and once that SAR is approved to go to the standard drafting stage, additional changes to the scope of the SAR cannot be made without re-posting the SAR. Standards Drafting Teams are limited to developing details for requirements that have already been identified in the SAR. Once the standard is approved, modifications may be initiated to the standard by submitting a new SAR that indicates what changes are needed. The process for updating an approved standard is addressed in the RSPM.</p>			
Paul Elwing Lakeland Elec #3			Certification Process should be reviewed separately in open forum as SAR's are

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<p>The OCTF that drafted the SAR asked the advice of NERC's legal counsel regarding whether to include the certification process within the Certification Standards. The response was that if a process/procedure must be followed by all entities in the same way, then the process/procedure must be included within the standard. The 'process' does not need to be included in the SAR, but does need to be included in the associated standard. The OCTF felt that without presenting the process, the industry would not have the information needed to understand how the process will be administered. During the workshops held by the OCTF, there were very clear directions to develop a process that was applied evenly from Region to Region.</p>			
Linda Campbell for FRCC OC #1, 3,4,5			<p>The FRCC OC does have questions regarding several parts of the certification process, but as stated earlier, this should not be part of the standard. The process should be reviewed by the industry in an open due process forum, but, it should not be considered a reliability standard. FRCC will hold our questions on the process for later review.</p>
<p>The OCTF that drafted the SAR asked the advice of NERC's legal counsel regarding whether to include the certification process within the Certification Standards. The response was that if a process/procedure must be followed by all entities in the same way, then the process/procedure must be included within the standard. The 'process' does not need to be included in the SAR, but does need to be included in the associated standard. The OCTF felt that without presenting the process, the industry would not have the information needed to understand how the process will be administered. During the workshops held by the OCTF, there were very clear directions to develop a process that was applied evenly from Region to Region.</p>			
Gerald Rheault Manitoba Hydro #1, 3, 5			<p>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.</p>
<p>The OCTF that drafted the SAR asked the advice of NERC's legal counsel regarding whether to include the certification process within the Certification Standards. The response was that if a process/procedure must be followed by all entities in the same way, then the process/procedure must be included within the standard. The 'process' does not need to be included in the SAR, but does need to be included in the associated standard. The OCTF felt that without presenting the process, the industry would not have the information needed to understand how the process will be administered. During the workshops held by the OCTF, there were very clear directions to develop a process that was applied evenly from Region to Region.</p>			
Joseph Krupar FL Muni Pwr Agency #3	X		
Ray Morella First Energy #1		X	
Andrew Wilcox NB Power #1		X	
Ken Githens Allegheny #5		X	
Ed Groce Avista #5		X	
James Regg TVA #1		X	

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Walter Cintron Con Ed #1		X	
Thomas J. Vandervort, Transmission Sub. Secretary #3, 5		X	0 - Yes, 3 - No, no comments
William Smith Allegheny #1		X	
Karl Kohlrus CWLP #5		X	
Peter Burke [submitting responses for ATC's Alan Staats, Paul Steinberger, and Bobbi Welch] ATC #1		X	
Kathleen Goodman ISO NE #2		X	
John Stickley Assoc Elec Coop #1		X	
Ed Riley CAISO #2		X	
Gordon Pietsch Great River Energy #1		X	
George Bartlett Entergy #1, 3, 5		X	

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

Summary Consideration: The consensus of the industry comments received indicates a need to have agreements between the TOP and its associated RA, TSPs and DPs. An agreement is defined as: A contract or other document delineating an arrangement that expresses assent by two or more parties to the same object. This arrangement determines a course of action to be followed by all parties involved in the situation. The key components of the agreement must identify the ability, intent, and authority of the parties. The requirement for these agreements can be satisfied in a variety of ways, including but not limited to: contracts, designation of authority documents, policies, procedures.

Commenter	RA	TSP	DP	Comments
Barry Gee National Grid #1 David Little Nova Scotia #1,3,5 A. Ralf Rufrano NYPA #1 B. John Muir Con Ed #1 C. Guy Zito NPCC #2	X X X X X	X	X	While National Grid (NPCC) (NYPA) recognizes that these entities must have agreements with the listed entities they may already reside in previous agreements.
An agreement is defined as: A contract or other document delineating an arrangement that expresses assent by two or more parties to the same object. This arrangement determines a course of action to be followed by all parties involved in the situation. The key components of the agreement must identify the ability, intent, and authority of the parties. The requirement for these agreements can be satisfied in a variety of ways, including but not limited to: contracts, designation of authority documents, policies, procedures.				
Jim Griffith Southern Co #1	X	X	X	The balancing authority should be included in the agreements required.
Alan Johnson Mirant #6	X	X	X	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.
An agreement is defined as: A contract or other document delineating an arrangement that expresses assent by two or more parties to the same object. This arrangement determines a course of action to be followed by all parties involved in the situation. The key components of the agreement must identify the ability, intent, and authority of the parties. The requirement for these agreements can be satisfied in a variety of ways, including but not limited to: contracts, designation of authority documents, policies, procedures.				
Thomas J. Vandervort, Transmission Subcommittee Secretary#3, 5	X	X	X	3 - Each applicable RA, 3 - Each applicable TSP, 2 - Each applicable DP, No Comments

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Karl Kohlrus CWLP #5	X	X	X	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.
The key components of the agreement must identify the ability, intent, and authority of the parties. The requirement for these agreements can be satisfied in a variety of ways, including but not limited to: contracts, designation of authority documents, policies, procedures.				
Carter B. Edge Southeastern Power #4, 5	X	X	X	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.
An agreement is defined as: A contract or other document delineating an arrangement that expresses assent by two or more parties to the same object. This arrangement determines a course of action to be followed by all parties involved in the situation. The key components of the agreement must identify the ability, intent, and authority of the parties. The requirement for these agreements can be satisfied in a variety of ways, including but not limited to: contracts, designation of authority documents, policies, procedures.				
Tom Pruitt Duke Energy Grid #1	X	X	X	This authority/provider should have agreements in place with all functional entities with which it interfaces (consistent with Certification Criterion 2).
Gerald Rheault Manitoba Hydro #1, 3, 5	X	X	X	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.
The requirement for these agreements can be satisfied in a variety of ways, including but not limited to: contracts, designation of authority documents, policies, procedures.				
Ed Riley CAISO #2	X	X		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

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				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.
An agreement is defined as: A contract or other document delineating an arrangement that expresses assent by two or more parties to the same object. This arrangement determines a course of action to be followed by all parties involved in the situation. The key components of the agreement must identify the ability, intent, and authority of the parties. The requirement for these agreements can be satisfied in a variety of ways, including but not limited to: contracts, designation of authority documents, policies, procedures.				
Art Giardino PSE&G #1		X	X	This is independent of any certification program.
The consensus of the industry comments received indicates a need to have agreements between the TOP and its associated RA, TSPs and DPs.				
Linda Campbell for FRCC OC #1, 3,4,5				FRCC does not believe that individual agreements with each entity are necessary. A Region's 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.
The consensus of the industry comments received indicates a need to have agreements between the TOP and its associated RA, TSPs and DPs.				
Alan Boesch NBPP #1				Will probably need agreements with generators to provide voltage support
The consensus of the industry comments received indicates a need to have agreements between the TOP and its associated RA, TSPs and DPs. The SAR DT will seek additional industry input into your suggestion.				
Roman Carter for Tony Reed Southern Co Gen & Mktg #3, 5, 6				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.
The consensus of the industry comments received indicates a need to have agreements between the TOP and its associated RA, TSPs and DPs.				
Tony Jankowski We Energies #3, 4, 5				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.

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				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.
Paul Elwing Lakeland Elec #3				Regional Security Process/Reliability Plans should identify responsibilities & authorities of each function regarding reliability, individual agreements inefficient/redundant.
The consensus of the industry comments received indicates a need to have agreements between the TOP and its associated RA, TSPs and DPs. The key components of the agreement must identify the ability, intent, and authority of the parties. The requirement for these agreements can be satisfied in a variety of ways, including but not limited to: contracts, designation of authority documents, policies, procedures.				
MIPS & LTIS				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.
The key components of the agreement must identify the ability, intent, and authority of the parties. The requirement for these agreements can be satisfied in a variety of ways, including but not limited to: contracts, designation of authority documents, policies, procedures.				
Martin Boisvert HQ #1	X	X	X	
Peter Burke [submitting responses for ATC's Alan Staats, Paul Steinberger, and Bobbi Welch] ATC #1	X	X	X	
Walter Cintron Con Ed #1	X	X	X	
William Smith Allegheny #1	X	X	X	
Lee Gladish CWLP #4	X	X	X	
Kathleen Goodman ISO NE #2	X	X	X	
John Sticklely Assoc Elec Coop #1	X	X	X	
Michael Desselle AEP #1	X	X	X	
AL DiCaprio MAAC #2	X	X	X	
Gordon Pietsch Great River Energy #1	X	X	X	
Jim Cyrulewski, International Transmission Company#1	X	X	X	
Andrew Wilcox NB Power #1	X	X	X	

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Ken Githens Allegheny #5	X	X	X	
James Regg TVA #1	X	X	X	
Dave Christiano City Util of Springfield # 3	X	X		
Ray Morella First Energy #1	X	X		
Paul Cafone PSE&G #1	X	X		
John Blazekovich Exelon #1, 3, 5, 6	X	X		
George Bartlett Entergy #1, 3, 5	X	X		
Joseph Krupar FL Muni Pwr Agency #3	X			
Ed Groce Avista #5	X			
William Reinke SERC #2		X		

9. What other agreements should be required for the Transmission Operator?

Background Information/Definition for SAR Comment Form: The intent of the requirement for agreements was to provide a vehicle for identifying the hierarchy of authority between an organization and the parties with which they interact.

An agreement is defined as: A contract or other document delineating an arrangement that expresses assent by two or more parties to the same object. This arrangement determines a course of action to be followed by all parties involved in the situation. The key components of the agreement must identify the ability, intent, and authority of the parties. The requirement for these agreements can be satisfied in a variety of ways, including but not limited to: contracts, designation of authority documents, policies, procedures.

Summary Consideration: There were several recommendations that agreements be added for other entities performing functions. We will ask the industry for more input on whether these agreements are needed in the certification requirements.

Commenter	Comments
Barry Gee National Grid #1 David Little Nova Scotia #1,3,5 Guy Zito NPCC #2	Assuming this question was posed regarding the TO, NPCC believes no additional agreements would be necessary.
MIPS & LTIS	(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.
Ray Morella First Energy #1	Assuming this question was posed regarding the TO, no additional agreements would be necessary.
Andrew Wilcox NB Power #1	You mean Transission Operator? None come to mind.
Alan Boesch NBPP #1	see above (Should this say TO instead of BA)
Linda Campbell for FRCC OC #1, 3,4,5	You mean the transmission operator . . . and as stated above, the FRCC is not sure that any agreements are necessary.
Ed Groce Avista #5	Need to change your survey question to reflect Trans Operator
Art Giardino PSE&G #1	Not sure why the balancing authority is singled out for this question.
Peter Burke [submitting responses for ATC's Alan Staats, Paul Steinberger, and Bobbi Welch] ATC #1	Black Start tariffs when the Balancing Authority owns and operates generation units critical to black start/restoration plans.
There were several recommendations that agreements be added for other entities performing functions. We will ask the industry for more input on whether these agreements are needed in the certification requirements.	
Carter B. Edge Southeastern Power #4,	It is still unclear what is meant by "agreements". There should be an understanding of the

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5	relationship between the entities interacting with the TOP function.
An agreement is defined as a contract or other document delineating an arrangement that expresses assent by two or more parties to the same object. This arrangement determines a course of action to be followed by all parties involved in the situation. The key components of the agreement must identify the ability, intent, and authority of the parties. The requirement for these agreements can be satisfied in a variety of ways, including but not limited to: contracts, designation of authority documents, policies, procedures.	
Martin Boisvert HQ #1	? This question is not applicable
Tom Pruitt Duke Energy Grid #1	I think this question is misplaced. Shouldn't it be on the BA SAR comment form?
Roman Carter for Tony Reed Southern Co Gen & Mktg #3, 5, 6	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.
There were several recommendations that agreements be added for other entities performing functions. We will ask the industry for more input on whether these agreements are needed in the certification requirements.	
John Stickley Assoc Elec Coop #1	I believe this question should have been directed toward the Transmission Operator rather than the Balancing Authority. No comments regardless.
Gerald Rheault Manitoba Hydro #1, 3, 5	The ones included in the SAR are adequate for proper functioning of the Transmission Operator.
Michael Desselle AEP #1	see comments to no. 1 above <i>{TOP_1. . . . 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.}</i>
The criteria for certified personnel are under the responsibility of the Personnel Subcommittee. Your concerns will be forwarded to the PS for consideration.	
The original criteria that was established by the OCTF was based on certifying the RA, BA, IA, TSP which were all identified in the Functional Model. When the OCTF held their workshops on the criteria contained in the Organization Certification White Paper, industry response received at the workshops and comments received from the posting indicated an industry consensus that it was the TOP that should be certified instead of the TSP. It was at that time that the OCTF developed the criteria for the TOP and dropped all efforts to certify the TSP.	
Tony Jankowski We Energies #3, 4, 5	The TOP should have agreements in place that support the concept of the "Coordinate Operations" standard with boundary connected authorities and operators.
Jim Griffith Southern Co #1	The should be changed to say "Interchange Authority" instead of Balancing Authority.

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<p>AL DiCaprio MAAC #2</p>	<p>See comment 1 <i>(TOP_1. The Model defines the T-Oper function for the entity that physically "operates the transmission facilities, and executes switching orders."</i> <i>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.</i> <i>In short, it would appear that as defined in the Model, the T-Oper does not have to be certified on standards.}</i></p>
<p>The original criteria that was established by the OCTF was based on certifying the RA, BA, IA, TSP which were all identified in the Functional Model. When the OCTF held their workshops on the criteria contained in the Organization Certification White Paper, industry response received at the workshops and comments received from the posting indicated an industry consensus that it was the TOP that should be certified instead of the TSP. It was at that time that the OCTF developed the criteria for the TOP and dropped all efforts to certify the TSP.</p>	
<p>Roger Green SOCO Generation #5</p>	<p>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.</p>
<p>There were several recommendations that agreements be added for other entities performing functions. We will ask the industry for more input on whether these agreements are needed in the certification requirements. An agreement is defined as a contract or other document delineating an arrangement that expresses assent by two or more parties to the same object. This arrangement determines a course of action to be followed by all parties involved in the situation. The key components of the agreement must identify the ability, intent, and authority of the parties. The requirement for these agreements can be satisfied in a variety of ways, including but not limited to: contracts, designation of authority documents, policies, procedures.</p>	
<p>Jim Cyrulewski, International Transmission Company #1</p>	<p>Believe this question was meant for Transmission Operator not BA. Additional agreement is needed with Generation Operation.</p>
<p>There were several recommendations that agreements be added for other entities performing functions. We will ask the industry for more input on whether these agreements are needed in the certification requirements.</p>	

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Joseph Krupar FL Muni Pwr Agency #3	The Standards of Conduct should be all that is necessary.
William Reinke SERC #2	Since this is a SAR comment for a Transmission Operator I'm not sure why this question is included.
Paul Cafone PSE&G #1	The same as those described in the other related SARs
Ed Riley CAISO #2	Data provision if not already covered as part of another "agreement".
Alan Johnson Mirant #6	None
James Regg TVA #1	None.
Thomas J. Vandervort, Transmission Subcommittee Secretary#3, 5	No Comments

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

Summary Consideration: The Confidentiality Agreement is a standard NERC agreement contained within the appendices of the NERC Operating Manual. Industry comments indicate that the TOP should be subject to signing a Confidentiality Agreement. This requirement will remain a part of the criteria for certification.

Commenter	Yes	No	Neutral	Comments
AL DiCaprio MAAC #2				<p>See comment 1</p> <p><i>(TOP_1. The Model defines the T-Oper function for the entity that physically "operates the transmission facilities, and executes switching orders."</i></p> <p><i>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.</i></p> <p><i>In short, it would appear that as defined in the Model, the T-Oper does not have to be certified on standards.}</i></p>
<p>The original criteria that was established by the OCTF was based on certifying the RA, BA, IA, TSP which were all identified in the Functional Model. When the OCTF held their workshops on the criteria contained in the Organization Certification White Paper, industry response received at the workshops and comments received from the posting indicated an industry consensus that it was the TOP that should be certified instead of the TSP. It was at that time that the OCTF developed the criteria for the TOP and dropped all efforts to certify the TSP.</p>				
Carter B. Edge Southeastern Power #4, 5			X	Only those entities desiring/having access to confidential information. It should NOT be made a criteria of certification.
<p>. Industry consensus indicates that the TOP should be required to sign this agreement.</p>				
MIPS & LTIS	X			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.
<p>. Industry consensus indicates that the TOP should be required to sign this agreement.</p>				

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Linda Campbell for FRCC OC #1, 3,4,5	X			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?
. Industry consensus indicates that the TOP should be required to sign this agreement.				
Martin Boisvert HQ #1	X			Organizations' (Corporate) Standards of Conduct should also apply
Kathleen Goodman ISO NE #2				See comment Item 6. {TOP_6. Entities requiring appropriate conduct likely already bound by FERC Order 888 / 889. This is a duplicative effort and should not be included.}
FERC 888 and 889 only apply to FERC jurisdictional entities. The requirements contained in the 'organization' section of the SAR were intended to protect market sensitive reliability-related data.				
Ed Riley CAISO #2	X	X	X	We are confused by this question - what type of confidentiality agreement are you considering? The NERC data confidentiality agreement or some other agreement?
This is the standard NERC Data Confidentiality Agreement addresses the protection of reliability-related data.				
Gerald Rheault Manitoba Hydro #1, 3, 5				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.
The agreements addressed elsewhere were intended to address the relationships between authorities without delving into the details of the working relationships. The NERC Confidentiality Agreement addresses the protection of reliability-related data.				
Alan Johnson Mirant #6	X			If the TO is going to have access to market data, then it should be subject to NERC Confidentiality Agreement
. Industry consensus indicates that the TOP should be required to sign this agreement.				
Art Giardino PSE&G #1	X			All participants should sign. Any violation should have immediate, severe consequences.
Tony Jankowski We Energies #3, 4, 5	X			The TOP should sign the NERC Confidentiality Agreement.
Thomas J. Vandervort, Transmission Subcommittee Secretary #3, 5	X		X	2 - Yes, 0 - No, 1 - Neutral, No Comments

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Barry Gee National Grid #1	X			
William Smith Allegheny #1	X			
David Little Nova Scotia #1,3,5	X			
Paul Elwing Lakeland Elec #3	X			
A. Ralf Rufrano NYPA #1	X			
Ray Morella First Energy #1	X			
John Muir Con Ed #1	X			
Andrew Wilcox NB Power #1	X			
Alan Boesch NBPP #1	X			
Ken Githens Allegheny #5	X			
James Regg TVA #1	X			
Walter Cintron Con Ed #1	X			
Guy Zito NPCC #2	X			
Karl Kohlrus CWLP #5	X			
Peter Burke [submitting responses for ATC's Alan Staats, Paul Steinberger, and Bobbi Welch] ATC #1	X			
Tom Pruitt Duke Energy Grid #1	X			
Roman Carter for Tony Reed Southern Co Gen & Mktg #3, 5, 6	X			
Lee Gladish CWLP #4	X			
John Stickley Assoc Elec Coop #1	X			

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Michael Desselle AEP #1	X			
Jim Griffith Southern Co #1	X			
Roger Green SOCO Generation #5	X			
Gordon Pietsch Great River Energy #1	X			
George Bartlett Entergy #1, 3, 5	X			
Jim Cyrulewski, International Transmission Company#1	X			
Dave Christiano City Util of Springfield # 3	X			
William Reinke SERC #2	X			
Paul Cafone PSE&G #1	X			
Ed Groce Avista #5			X	

1. Who should be required to sign a confidentiality agreement?

Summary Consideration: The Confidentiality Agreement is a standard NERC agreement contained within the appendices of the NERC Operating Manual. Industry consensus indicates that the TOP should be required to sign this agreement.

Commenter	RA	BA	IA	TOP	TSP	Comments
Barry Gee National Grid #1 David Little Nova Scotia #1,3,5 John Muir Con Ed #1 Guy Zito NPCC #2 Ralf Rufrano NYPA #1	X X X X	X	X	X	X	National Grid (NPCC) feels that all of the above need to sign the NERC Confidentiality Agreement if this is the "agreement" being referred to.
Alan Boesch NBPP #1	X	X	X	X	X	I think so, what is in the confidentiality agreement
Alan Johnson Mirant #6	X	X	X	X	X	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.
Thomas J. Vandervort, Transmission Subcommittee Secretary #3, 5	X	X	X	X	X	3 - RA, 1 - BA, 2 - IA, 2 - TOP, 1 - TSP, No Comments
Jim Cyrulewski, International Transmission Company #1	X	X	X	X	X	Not sure why this question asked. Already covered in RA, IA and BA SARs.
Art Giardino PSE&G #1	X	X	X	X	X	See comment above.
Martin Boisvert HQ #1	X	X	X	X	X	Either each individual or the management
Tom Pruitt Duke Energy Grid #1	X	X	X	X	X	Any entity which receives data that is considered to be confidential should sign a confidentiality agreement.
George Bartlett Entergy #1, 3, 5	X	X		X	X	IAs should only be required to sign a confidentiality agreement if they are an independent entity. We believe IAs are market participants.

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Peter Burke [submitting responses for ATC's Alan Staats, Paul Steinberger, and Bobbi Welch] ATC #1	X	X		X	X	Any party having access to confidential transmission information.
Roman Carter for Tony Reed Southern Co Gen & Mktg #3, 5, 6	X		X	X	X	Without knowing details of the confidentiality agreement and whether it would prevent an entity from performing other economic generator-related functions, it is unclear whether a Balancing Authority should be required to sign.
Roger Green SOCO Generation #5	X		X	X	X	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.
Tony Jankowski We Energies #3, 4, 5				X		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
Ed Riley CAISO #2						We are confused by this question - what type of confidentiality agreement are you considering? The NERC data confidentiality agreement or some other agreement?
Linda Campbell for FRCC OC #1, 3,4,5						The other entities identified in this question should be addressed through their own respective SAR.
Carter B. Edge Southeastern Power #4, 5						Only those entities desiring/having access to confidential information. It should NOT be made a criteria of certification.
Gerald Rheault Manitoba Hydro #1, 3, 5						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.
Paul Elwing Lakeland Elec #3						Entities handling commercially sensitive information
MIPS & LTIS						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.
Andrew Wilcox NB Power #1	X	X	X	X	X	
Michael Desselle AEP #1	X	X	X	X	X	
William Smith Allegheny #1	X	X	X	X	X	

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John Blazekovich Exelon #1, 3, 5, 6	X	X	X	X	X	
Ken Githens Allegheny #5	X	X	X	X	X	
Walter Cintron Con Ed #1	X	X	X	X	X	
Lee Gladish CWLP #4	X	X	X	X	X	
John Stickleby Assoc Elec Coop #1	X	X	X	X	X	
Jim Griffith Southern Co #1	X	X	X	X	X	
AL DiCaprio MAAC #2	X	X	X	X	X	
Gordon Pietsch Great River Energy #1	X	X	X	X		
William Reinke SERC #2	X	X	X	X	X	
Paul Cafone PSE&G #1	X	X	X	X	X	
Ray Morella First Energy #1	X	X	X	X	X	
James Regg TVA #1	X	X	X	X		
Karl Kohlrus CWLP #5	X	X	X	X		
Dave Christiano City Util of Springfield # 3	X			X		

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.

Commenter	Yes	No	Comments
Michael Desselle AEP #1	X		<p>see comments to no. 1 above</p> <p><i>{TOP_1. {TOP_1. . . . 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.}</i></p>
<p>The criteria for certified personnel are under the responsibility of the Personnel Subcommittee. Your concerns will be forwarded to the PS for consideration.</p> <p>The original criteria that was established by the OCTF was based on certifying the RA, BA, IA, TSP which were all identified in the Functional Model. When the OCTF held their workshops on the criteria contained in the Organization Certification White Paper, industry response received at the workshops and comments received from the posting indicated an industry consensus that it was the TOP that should be certified instead of the TSP. It was at that time that the OCTF developed the criteria for the TOP and dropped all efforts to certify the TSP.</p>			
AL DiCaprio MAAC #2			<p>See comment 1</p> <p><i>(TOP_1. The Model defines the T-Oper function for the entity that physically "operates the transmission facilities, and executes switching orders."</i></p> <p><i>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.</i></p> <p><i>In short, it would appear that as defined in the Model, the T-Oper does not have to be certified on standards.}</i></p>
<p>The original criteria that was established by the OCTF was based on certifying the RA, BA, IA, TSP which were all identified in the Functional Model. When the OCTF held their workshops on the criteria contained in the Organization Certification White Paper, industry response received at the workshops and comments received from the posting indicated an industry consensus that it was the TOP that should be certified instead of the TSP. It was at that time that the OCTF developed the criteria for the TOP and dropped all efforts to certify the TSP.</p>			
Martin Boisvert HQ #1	X		<p>Refer to Question 1</p> <p><i>{TOP_1. 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.</i></p> <p><i>The Transmission operator performs his reliability activities under the responsibility and</i></p>

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			<i>supervision of the Reliability Coordinator. }</i>
The criteria for certified personnel are under the responsibility of the Personnel Subcommittee. Your concerns will be forwarded to the PS for consideration.			
Joseph Krupar FL Muni Pwr Agency #3	X		The Transmission Operator Criteria should be changed to include only the bulk electric power system Transmission Operator.
The criteria for certifying the TOP was based on the Transmission Operator as defined in the Functional Model. The Functional Model did not specifically identify 'bulk electric power system'. The SAR DT will consider your comments in modifications to the SAR.			
Art Giardino PSE&G #1	X		Eliminate Establishing limits (5.4.2) as this is not the operator's function
The criteria for certifying the TOP was based on the Transmission Operator as defined in the Functional Model. The SAR DT will consider your comments in modifications to the SAR.			
MIPS & LTIS	X		<p>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.</p> <p>The certification criteria that would be contained in the standard should be more specific.</p> <p>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.</p>
As envisioned, certification is a formal process to verify that an entity had the capability of operating reliably. The consensus of the industry is that these agreements need to be in place.			
The details of the criteria (specific requirements, measures, expected performance/outcomes) will be developed by the Standards Drafting Team.			
It is envisioned that the current work being performed by the FMRTG will clarify some issues of the Functional Model.			
John Blazekovich Exelon #1, 3, 5, 6	X		Because Exelon does not see this issue solely as a "core reliability" issue and believe the certification criteria and process should be defined by the appropriate NERC and or NAESB process. We believe it is premature for NERC to define the process at this time.
The criteria contained within the SARs was drafted to support reliability of the interconnected North American grid, not to support business practices. The SAR, once fully developed, will go to the NERC/NAESB JIC to determine if the associated standard will be developed as a Business Practice by NAESB or as a Reliability Standard developed by NERC.			
Alan Boesch NBPP #1	X		<p>See question 6</p> <p><i>{TOP_6. There is a lot of specific criteria identified that appears to be based on existing</i></p>

			<i>standards. Would it be better for the criteria to be identified in future standards.}</i>
<p>This SAR includes some details that aren't in other SARs – this is because of some specific requests made by industry participants during Workshops. The standard drafting team will add even more specific requirements, measures and descriptions of expected performance/outcomes.</p>			
Carter B. Edge Southeastern Power #4, 5	X		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.
<p>The code of conduct is intended to protect market sensitive reliability-related data. It does not have to be exactly the same as the FERC Code of Conduct. Each entity can develop its own code of conduct. The details of what would be required in a 'code of conduct' will be developed by the Standards Drafting Team.</p>			
Roman Carter for Tony Reed Southern Co Gen & Mktg #3, 5, 6	X		<p>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.</p> <p>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.</p> <p>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?</p>
<p>This SAR includes some details that aren't in other SARs – this is because of some specific requests made by industry participants during Workshops. The standard drafting team will add even more specific requirements, measures and descriptions of expected performance/outcomes.</p> <p>The SAR DT will consider you comments in modifications made to the SAR for future comment posting periods.</p> <p>The inclusion of a code of conduct requirement is be reconsidered by the SAR DT.</p>			
Linda Campbell for FRCC OC #1, 3,4,5			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.

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<p>The OCTF that drafted the SAR asked the advice of NERC's legal counsel regarding whether to include the certification process within the Certification Standards. The response was that if a process/procedure must be followed by all entities in the same way, then the process/procedure must be included within the standard. The 'process' does not need to be included in the SAR, but does need to be included in the associated standard. The OCTF felt that without presenting the process, the industry would not have the information needed to understand how the process will be administered. During the workshops held by the OCTF, there were very clear directions to develop a process that was applied evenly from Region to Region.</p>			
Gerald Rheault Manitoba Hydro #1, 3, 5	X		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.
<p>The code of conduct is intended to protect market sensitive reliability-related data. It does not have to be exactly the same as the FERC Code of Conduct. Each entity can develop its own code of conduct. The details of what would be required in a 'code of conduct' will be developed by the Standards Drafting Team.</p>			
Dave Christiano City Util of Springfield # 3	X		See answer to #6 above. <i>{TOP_6. 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).}</i>
<p>This SAR includes some details that aren't in other SARs – this is because of some specific requests made by industry participants during Workshops. The standard drafting team will add even more specific requirements, measures and descriptions of expected performance/outcomes.</p>			
Paul Cafone PSE&G #1	X		see my previous answer
Roger Green SOCO Generation #5		X	See our response to Question 15. <i>{TOP_15. 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.}</i>

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<p>If the need for a modification is identified during the SAR Drafting stage, the SAR DT can make modifications to the SAR. The scope of each standard must be defined within a SAR and once that SAR is approved to go to the standard drafting stage, additional changes to the scope of the SAR cannot be made without re-posting the SAR. Standards Drafting Teams are limited to developing details for requirements that have already been identified in the SAR. Once the standard is approved, modifications may be initiated to the standard by submitting a new SAR that indicates what changes are needed. The process for updating an approved standard is addressed in the RSPM.</p>			
<p>Thomas J. Vandervort, Transmission Subcommittee Secretary #3, 5</p>	X	X	<p>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.</p>
<p>This SAR includes some details that aren't in other SARs – this is because of some specific requests made by industry participants during Workshops. The standard drafting team will add even more specific requirements, measures and descriptions of expected performance/outcomes.</p>			
<p>Tony Jankowski We Energies #3, 4, 5</p>			<p>The certification criteria and requirements contained in the standard need to be more specific and contain what constitutes failure to meet</p>
<p>The details of the criteria (specific requirements, measures, expected performance/outcomes) will be developed by the Standards Drafting Team.</p>			
<p>Barry Gee National Grid #1</p>		X	
<p>William Smith Allegheny #1</p>		X	
<p>David Little Nova Scotia #1,3,5</p>		X	
<p>A. Ralf Rufrano NYPA #1</p>		X	
<p>Ray Morella First Energy #1</p>		X	
<p>John Muir Con Ed #1</p>		X	
<p>Andrew Wilcox NB Power #1</p>		X	
<p>Alan Johnson Mirant #6</p>		X	
<p>Ed Groce Avista #5</p>		X	

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James Regg TVA #1		X	
Walter Cintron Con Ed #1		X	
Guy Zito NPCC #2		X	
Peter Burke [submitting responses for ATC's Alan Staats, Paul Steinberger, and Bobbi Welch] ATC #1		X	
Tom Pruitt Duke Energy Grid #1		X	
Lee Gladish CWLP #4		X	
John Stickleby Assoc Elec Coop #1		X	
Jim Griffith Southern Co #1		X	
Ray Gross PJM #2			
Gordon Pietsch Great River Energy #1		X	
George Bartlett Entergy #1, 3, 5		X	
Jim Cyrulewski, International Transmission Company #1		X	
William Reinke SERC #2		X	
Ed Riley CAISO #2		X	
Karl Kohlrus CWLP #5	X	X	

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.

Commenter	Yes	No	Comments
Martin Boisvert HQ #1	X		<p><i>Refer to Question 1</i></p> <p><i>{TOP_1. 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.</i></p> <p><i>The Transmission operator performs his reliability activities under the responsibility and supervision of the Reliability Coordinator. }</i></p>
<p>The criteria for certified personnel are under the responsibility of the Personnel Subcommittee. Your concerns will be forwarded to the PS for consideration.</p>			
William Reinke SERC #2	X		A decertification process is needed. See #7
<p>The SAR DT will seek industry input into the inclusion of De-certification in this SAR. Modification may be made based in the outcome of this input.</p>			
Paul Elwing Lakeland Elec #3	X		Definition of TOP functions insufficient, TOP should monitor, assess and maintain local reliability.
MIPS & LTIS	X		<p>There should be a statement that clearly states that the TO applicant can comply with all applicable NERC standards.</p> <p>There is no description of the circumstances under which a TO would be decertified.</p>
<p>The SAR DT is making modifications to the criteria and will seek industry affirmation.</p> <p>The SAR DT will seek industry input into the inclusion of De-certification in this SAR. Modification may be made based in the outcome of this input.</p>			
Linda Campbell for FRCC OC #1, 3,4,5	X		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.
<p>There will be some modifications to the criteria that will further define the addition of tools to the criteria.</p>			
Karl Kohlrus CWLP #5	X		Allow a single certification for traditional Control Areas.
<p>The OCTF is currently working on a Transition Plan for migrating from Control Area to Functional Entities. Your comment will be forwarded to them.</p>			
Art Giardino PSE&G #1	X		The entity that operates and maintains should have provisions for the physical security of the

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			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.
Roman Carter for Tony Reed Southern Co Gen & Mktg #3, 5, 6	X		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.
It was envisioned that 5.2 and 5.3 of the criteria would cover the are of your comment.			
Kathleen Goodman ISO NE #2	X		Having a process/procedure in place does not ensure that the reliability requirements are being fulfilled.
It is envisioned that the Compliance Enforcement programs will ensure that requirements are being fulfilled during their normal audits.			
Gerald Rheault Manitoba Hydro #1, 3, 5	X		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.
The SAR DT will consider you comments in modifications made to the SAR for future comment posting periods.			
Tony Jankowski We Energies #3, 4, 5	X		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.
The SAR DT is making modifications to the criteria and will seek industry affirmation.			
The SAR DT will seek industry input into the inclusion of De-certification in this SAR. Modification may be made based in the outcome of this input.			
John Blazekovich Exelon #1, 3, 5, 6			Because Exelon does not see this issue solely as a "core reliability" issue and believe the certification criteria and process should be defined by the appropriate NERC and or NAESB process. We believe it is premature for NERC to define the process at this time.
The SAR, once fully developed, will go to the NERC/NAESB JIC to determine if the associated standard will be developed as a Business Practice by NAESB or as a Reliability Standard developed by NERC.			
Paul Cafone PSE&G #1	X		see my previous answer
Lee Gladish CWLP #4	X		

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Tom Pruitt Duke Energy Grid #1		X	
Michael Desselle AEP #1		X	
John Sticklely Assoc Elec Coop #1		X	
Gordon Pietsch Great River Energy #1		X	
George Bartlett Entergy #1, 3, 5		X	
Jim Cyrulewski, International Transmission Company#1		X	
Dave Christiano City Util of Springfield # 3		X	
Jim Griffith Southern Co #1		X	
AL DiCaprio MAAC #2		X	
Ed Riley CAISO #2		X	
Barry Gee National Grid #1		X	
William Smith Allegheny #1		X	
David Little Nova Scotia #1,3,5		X	
A. Ralf Rufrano NYPA #1		X	
Ray Morella First Energy #1		X	
John Muir Con Ed #1		X	
Andrew Wilcox NB Power #1		X	
Alan Johnson Mirant #6		X	
Ed Groce Avista #5		X	
James Regg TVA #1		X	

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Walter Cintron Con Ed #1		X	
Guy Zito NPCC #2		X	
Thomas J. Vandervort, Transmission Subcommittee Secretary #3, 5		X	0 - Yes, 3 - No, No Comments
Peter Burke [submitting responses for ATC's Alan Staats, Paul Steinberger, and Bobbi Welch] ATC #1		X	
Carter B. Edge Southeastern Power #4, 5		X	

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

Commenter	Comments
AL DiCaprio MAAC #2	<p>See comment 1</p> <p><i>(TOP_1. The Model defines the T-Oper function for the entity that physically "operates the transmission facilities, and executes switching orders."</i></p> <p><i>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.</i></p> <p><i>In short, it would appear that as defined in the Model, the T-Oper does not have to be certified on standards.}</i></p>
<p>The original criteria that was established by the OCTF was based on certifying the RA, BA, IA, TSP which were all identified in the Functional Model. When the OCTF held their workshops on the criteria contained in the Organization Certification White Paper, industry response received at the workshops and comments received from the posting indicated an industry consensus that it was the TOP that should be certified instead of the TSP. It was at that time that the OCTF developed the criteria for the TOP and dropped all efforts to certify the TSP.</p>	
Paul Elwing Lakeland Elec #3	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
Linda Campbell for FRCC OC #1, 3,4,5	FRCC requires their own confidentiality agreement in addition to the NERC agreement. In addition, FRCC's Security Process (Reliability Plan) has other requirements for tools, etc. that must be met. Also, NERC can not set a requirement for the TOP that will preempt any state jurisdictional requirements.
<p>The SAR DT will consider you comments in modifications made to the SAR for future comment posting periods.</p>	
Michael Desselle AEP #1	Standards should be agreed upon by NERC/NAESB to settle regional differences.
<p>The SAR, once fully developed, will go to the NERC/NAESB JIC to determine if the associated standard will be developed as a Business Practice by NAESB or as a Reliability Standard developed by NERC.</p>	
Paul Cafone PSE&G #1	There are Multiple Differences and Variations, to many to be cited herein.
<p>Please identify these regional differences more specifically.</p>	
Ed Riley CAISO #2	WECC has a data confidentiality agreement in place for real time operating data.
<p>The SAR DT will consider you comments in modifications made to the SAR for future comment posting periods.</p>	
Peter Burke [submitting responses for ATC's Alan Staats, Paul Steinberger,	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.

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and Bobbi Welch] ATC #1	
Jim Cyrulewski, International Transmission Company #1	None
Dave Christiano City Util of Springfield # 3	None
Thomas J. Vandervort, Transmission Subcommittee Secretary #3, 5	No Regional Differences noted
Carter B. Edge Southeastern Power #4, 5	none
Tony Jankowski We Energies #3, 4, 5	None – All organization certifications need to be consistent.
Gerald Rheault Manitoba Hydro #1, 3, 5	Manitoba Hydro is not aware of any Regional Differences which need to be addressed.

14. Other Comments on this Certification SAR:

Commenter	Comments
<p>Thomas J. Vandervort, Transmission Subcommittee Secretary #3, 5</p>	<p>(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.</p> <p>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?</p> <p>(2) The SAR, if accepted as written, will restrict the Standard Drafting Team from the choice of wording, language and expanding the requirements.</p>
<p>Barry Gee National Grid #1 David Little Nova Scotia #1,3,5 A. Ralf Ruffano NYPA #1 B. John Muir Con Ed #1 C. Guy Zito NPCC #2</p>	<p>National Grid (NPCC) (NYPA) (Con Ed) 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.</p> <p>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.</p>

<p>The criteria for certified personnel are under the responsibility of the Personnel Subcommittee. Your concerns will be forwarded to the PS for consideration.</p>	
<p>William Smith Allegheny #1</p>	<p>In order to promote consistency throughout NERC, the Review Team should use a NERC Standardized "evaluation review template".</p>
<p>As it is envisioned, certification review teams across all Regions will use the same standards and review templates. The only differences that will exist are those Regional differences that have been approved and any Interconnection differences that may exist.</p>	
<p>Ken Githens Allegheny #5</p>	<p>Any certification team member should not be an employee of the organization being certified.</p>
<p>As envisioned, this would not be allowed.</p>	
<p>Walter Cintron Con Ed #1</p>	<p>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.</p>
<p>The criteria for certified personnel are under the responsibility of the Personnel Subcommittee. Your concerns will be forwarded to the PS for consideration.</p>	
<p>Peter Burke [submitting responses for ATC's Alan Staats, Paul Steinberger, and Bobbi Welch] ATC #1</p>	<p>(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.</p>
<p>The terms used to identify the functions were identified by the CACTF. The FMRTG is currently reviewing the Functional Model and your comments will be forwarded to them for consideration. Certification can be completed sooner than nine months, but it could take the full nine months.</p>	
<p>Roman Carter for Tony Reed Southern Co Gen & Mktg #3, 5, 6</p>	<p>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?</p>

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<p>The criteria for certified personnel are under the responsibility of the Personnel Subcommittee. Your concerns will be forwarded to the PS for consideration.</p>	
<p>Gerald Rheault Manitoba Hydro #1, 3, 5</p>	<p>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.</p>
<p>Comments will be considered during the revision process of the SAR after seeking additional industry input.</p>	
<p>William Reinke SERC #2</p>	<p>I believe the fundamental question here is whether the industry needs a Standard for certification of this function. Isn't this a business practice? I understand that the SAC cannot remove a SAR based on comments received. Therefore I suggest that Mr Burrows and the OCTF review the need for a Standard for certification and withdraw the request. If we proceed down this path I'm afraid that the Standards Process, already looking like an administrative nightmare, will be cluttered with requests for Standards that are really processes.</p>
<p>The industry consensus from the comments received identifies that certification of the TOP is a reliability issue that NERC should continue to pursue.</p>	
<p>Paul Cafone PSE&G #1</p>	<p>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.</p> <p>We have the cart before the Horse.</p>
<p>The industry consensus from the comments received identifies that certification of the TOP is a reliability issue that NERC should continue to pursue.</p>	
<p>Carter B. Edge Southeastern Power #4, 5</p>	<p>Question # 9 should refer to the TOP and not the BA.</p>
<p>John Blazekovich Exelon #1, 3, 5, 6</p>	<p>Exelon feels that the series of "certification" SARs should be submitted to the NERC/NAESB JIC process. Once in the NERC/NAESB JIC process, we ask that the issue of overlapping responsibilities (as defined in the NERC Functional Model) among balancing authorities, interchange authorities, transmission owners and RTOs be addressed.</p>
<p>The SAR is presented to the NERC/NAESB JIC once the industry has reached consensus on the need for the standard and the scope of the proposed standard. If Regional Differences are included in the SAR they will be presented to the JIC as part of the SAR.</p>	
<p>Paul Elwing Lakeland Elec #3</p>	<p>SAR should be put on hold until Functional Model completed & Certification Processes should not be included in the SAR</p>

<p>The changes to the Functional Model are not expected to significantly change the required 'capabilities' contained within the draft SARs. Even though we may need to make some minor adjustments to the certification requirements as a result of the FMRTG, there seems to be industry consensus on the need to make a start in developing these certification standards.</p> <p>The OCTF included the certification process in the SAR because the industry requested (during industry workshops) that the certification process be addressed consistently across Regional Boundaries. The only way to ensure that a process be followed consistently is to include the process within the standard. We will ask the industry to confirm that the process should be applied consistently across regional boundaries by being included in the SAR and associated Standard.</p>	
<p>MIPS & LTIS Tony Jankowski We Energies #3, 4, 5</p>	<p>Throughout the text the SAR and comment form implies the Region has authority for conducting the certification process, up to and including dispute resolution. This conflicts with your question asking who should conduct the certification.</p>
<p>The consensus of the comments is that all affected Regions should be involved, but that one of those Regions should take the lead in coordinating the effort and the certification decision should be a collective effort made equally by all team members. We will ask the industry if this is accurate. The determination of what type of organization should lead the certification process is being determined through the industry's comments on these SARs.</p>	
<p>Alan Johnson Mirant #6</p>	<p>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.</p>
<p>The changes to the Functional Model are not expected to significantly change the required 'capabilities' contained within the draft SARs. Even though we may need to make some minor adjustments to the certification requirements as a result of the FMRTG, there seems to be industry consensus on the need to make a start in developing these certification standards.</p>	
<p>Linda Campbell for FRCC OC #1, 3,4,5</p>	<p>The process for certification should be removed completely.</p>
<p>The OCTF that drafted the SAR asked the advice of NERC's legal counsel regarding whether to include the certification process within the Certification Standards. The response was that if a process/procedure must be followed by all entities in the same way, then the process/procedure must be included within the standard. The 'process' does not need to be included in the SAR, but does need to be included in the associated standard. The OCTF felt that without presenting the process, the industry would not have the information needed to understand how the process will be administered. During the workshops held by the OCTF, there were very clear directions to develop a process that was applied evenly from Region to Region.</p>	
<p>Roger Green SOCO Generation #5</p>	<p>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</p>

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	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.
<p>If the need for a modification is identified during the SAR Drafting stage, the SAR DT can make modifications to the SAR. The scope of each standard must be defined within a SAR and once that SAR is approved to go to the standard drafting stage, additional changes to the scope of the SAR cannot be made without re-posting the SAR. Standards Drafting Teams are limited to developing details for requirements that have already been identified in the SAR. Once the standard is approved, modifications may be initiated to the standard by submitting a new SAR that indicates what changes are needed. The process for updating an approved standard is addressed in the RSPM.</p>	
Art Giardino PSE&G #1	This SAR should be cancelled.
<p>The industry consensus from the comments received identifies that certification of the TOP is a reliability issue that NERC should continue to pursue.</p>	
Jim Cyrulewski, International Transmission Company#1	None

2. When should re-certification occur? Check all that apply.

Summary Consideration: Industry consensus indicates a need for re-certification for a change to the footprint, repeated non-compliance, and flagrant violations. There does not appear to be an industry consensus to support re-certification on a periodic basis. Comments received opposed to periodic re-certification based their justification on performance adherence to the Compliance and Enforcement Program. The SAR DT will seek additional industry input surrounding the specifics associated with the situations identified to initiate a re-certification.

Commenter	Periodic	Chg Footprint	Repeat Non comp	Flagr Violat	Comments
Ed Riley CAISO #2	X	X	X	X	All of the above are appropriate triggers for review/recertification.
Alan Boesch NBPP #1	X	X	X	X	Major industry changes
Alan Johnson Mirant #6	X	X	X	X	With periodic defined as every 5 - 10 years.
Ken Githens Allegheny #5	X	X	X	X	Periodic recertification time intervals should be extended if other items are included.
Thomas J. Vandervort, Transmission Subcommittee Secretary #3, 5	X	X	X	X	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.

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The SAR DT will seek additional industry input surrounding the specifics associated with the situations identified to initiate a re-certification.					
Peter Burke [for ATC's Alan Staats, Paul Steinberger, and Bobbi Welch] ATC #1	X	X	X	X	If there are no other triggers, then a Periodic time frame should apply, possibly five to eight years.
The SAR DT will seek additional industry input surrounding the specifics associated with the situations identified to initiate a re-certification and de-certification.					
Tom Pruitt Duke Energy Grid #1	X	X	X	X	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.
The SAR DT will seek additional industry input surrounding the specifics associated with the situations identified to initiate a re-certification and de-certification.					
Roman Carter for Tony Reed Southern Co Gen & Mktg #3, 5, 6	X	X	X	X	For periodic re-certification, this should not occur any sooner than every 3 years.
Kathleen Goodman ISO NE #2	X	X	X	X	Periodic should be something like 5 years.
John Stickley Assoc Elec Coop #1	X	X	X	X	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.
The SAR DT will seek additional industry input surrounding the specifics associated with the situations identified to initiate a re-certification and de-certification.					
Jim Cyrulewski, International Transmission Company#1	X	X	X	X	For second bullet, change in footprint is questionable for recertification. For footprint change, believe this needs to be addressed as new certification.
. The SAR DT will seek additional industry input surrounding the specifics associated with the situations identified to initiate a re-certification and de-certification.					
MIPS & LTIS	X	X			Recertification due to repetitive and/or flagrant non-compliance should only be initiated upon decertification by the Compliance and

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					Monitoring Program.
<p>Industry consensus indicates a need for re-certification for a change to the footprint, repeated non-compliance, and flagrant violations. There does not appear to an industry consensus to support re-certification on a periodic basis. Comments received opposed to periodic re-certification based their justification on performance adherence to the Compliance and Enforcement Program. The SAR DT will seek additional industry input surrounding the specifics associated with the situations identified to initiate a re-certification and de-certification.</p>					
Tony Jankowski We Energies #3, 4, 5	X	X			Recertification due to repetitive and/or flagrant non-compliance should only be initiated upon decertification by the Compliance and Monitoring Program.
<p>Industry consensus indicates a need for re-certification for a change to the footprint, repeated non-compliance, and flagrant violations. There does not appear to an industry consensus to support re-certification on a periodic basis. Comments received opposed to periodic re-certification based their justification on performance adherence to the Compliance and Enforcement Program. The SAR DT will seek additional industry input surrounding the specifics associated with the situations identified to initiate a re-certification and de-certification.</p>					
Gerald Rheault Manitoba Hydro #1, 3, 5		X	X	X	There is no purpose in performing a re-certification on a Functional Authority which is operating satisfactorily. Other Standards which are presently being developed will periodically review whether this Functional Authority is properly performing the tasks required of it. This will be done through a self-certification review or a Reliability Audit which are performed on a yearly and three year basis respectively. If these reviews result in non compliance then a re-certification review may be required.
<p>Industry consensus indicates a need for re-certification for a change to the footprint, repeated non-compliance, and flagrant violations. There does not appear to an industry consensus to support re-certification on a periodic basis. Comments received opposed to periodic re-certification based their justification on performance adherence to the Compliance and Enforcement Program. The SAR DT will seek additional industry input surrounding the specifics associated with the situations identified to initiate a re-certification and de-certification.</p>					
William Reinke SERC #2		X	X	X	I suggest that periodic audits of the TO will accomplish the intent of a periodic recertification. For that reason, a specific periodic recertification is unnecessary.
<p>Industry consensus indicates a need for re-certification for a change to the footprint, repeated non-compliance, and flagrant violations. There does not appear to an industry consensus to support re-certification on a periodic basis. Comments received opposed to periodic re-certification based their justification on performance adherence to the Compliance and Enforcement Program. The SAR DT will seek additional industry input surrounding the specifics associated with the situations identified to initiate a re-certification and de-certification.</p>					
AL DiCaprio MAAC #2					See comment 1 <i>(TOP_1. The Model defines the T-Oper function for the entity that physically "operates the transmission facilities, and executes</i>

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					<p><i>switching orders."</i></p> <p><i>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 sauvy, it only needs to have a contractual responsibility to carry out the directives of the RA.</i></p> <p><i>In short, it would appear that as defined in the Model, the T-Oper does not have to be certified on standards.}</i></p>
<p>The original criteria that was established by the OCTF was based on certifying the RA, BA, IA, TSP which were all identified in the Functional Model. When the OCTF held their workshops on the criteria contained in the Organization Certification White Paper, industry response received at the workshops and comments received from the posting indicated an industry consensus that it was the TOP that should be certified instead of the TSP. It was at that time that the OCTF developed the criteria for the TOP and dropped all efforts to certify the TSP.</p>					
Michael Desselle AEP #1					<p>see comments for no. 1 above</p> <p><i>{TOP_1. . . . 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.}</i></p>
<p>The criteria for certified personnel are under the responsibility of the Personnel Subcommittee. Your concerns will be forwarded to the PS for consideration.</p> <p>The original criteria that was established by the OCTF was based on certifying the RA, BA, IA, TSP which were all identified in the Functional Model. When the OCTF held their workshops on the criteria contained in the Organization Certification White Paper, industry response received at the workshops and comments received from the posting indicated an industry consensus that it was the TOP that should be certified instead of the TSP. It was at that time that the OCTF developed the criteria for the TOP and dropped all efforts to certify the TSP.</p>					
John Blazekovich Exelon #1, 3, 5, 6					<p>Because Exelon does not see this issue solely as a "core reliability" issue and believe the certification criteria and process should be defined by the appropriate NERC and or NAESB process. We believe it is premature for NERC to define the process at this time.</p>
<p>The criteria contained within the SARs was drafted to support reliability of the interconnected North American grid, not to support business practices. The SAR, once fully developed, will go to the NERC/NAESB JIC to determine if the associated standard will be developed as a Business Practice by NAESB or as a Reliability Standard developed by NERC.</p>					
Linda Campbell for FRCC OC #1, 3,4,5					<p>FRCC does not believe a re-certification process is necessary. The BA will be monitored through the compliance measurements included in the standard. A separate re-certification process is an unnecessary and costly make-work effort. Having said that, we do</p>

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					believe that a process for de-certification should be developed to address repetitive non-compliance or flagrant violation of reliability standards.
The SAR DT will seek additional industry input surrounding the specifics associated with the situations identified to initiate a re-certification and de-certification.					
Art Giardino PSE&G #1					None, this should not be a NERC Certification.
The industry consensus from the comments received identifies that certification of the TOP is a reliability issue that NERC should continue to pursue.					
Carter B. Edge Southeastern Power #4, 5					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 TOP function are validated.
Industry consensus indicates a need for re-certification for a change to the footprint, repeated non-compliance, and flagrant violations. There does not appear to an industry consensus to support re-certification on a periodic basis. Comments received opposed to periodic re-certification based their justification on performance adherence to the Compliance and Enforcement Program.					
William Smith Allegheny #1	X	X	X	X	
Martin Boisvert HQ #1	X	X	X	X	
Lee Gladish CWLP #4	X	X	X	X	
Karl Kohlrus CWLP #5	X	X	X	X	
James Regg TVA #1	X	X	X	X	
Walter Cintron Con Ed #1	X	X	X	X	
Jim Griffith Southern Co #1	X	X	X	X	
Roger Green SOCO Generation #5	X	X	X	X	
Gordon Pietsch Great River Energy #1	X	X	X	X	
Paul Cafone PSE&G #1	X	X	X	X	
Ray Morella First Energy #1	X		X	X	
Dave Christiano City Util of Springfield # 3	X		X	X	

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David Little Nova Scotia #1,3,5		X	X	X	
A. Ralf Rufrano NYPA #1		X	X	X	
Barry Gee National Grid #1		X	X	X	
John Muir Con Ed #1		X	X	X	
Guy Zito NPCC #2		X	X	X	
Joseph Krupar FL Muni Pwr Agency #3	X	X			
Andrew Wilcox NB Power #1			X	X	
George Bartlett Entergy #1, 3, 5	X			X	
Paul Elwing Lakeland Elec #3				X	
Ed Groce Avista #5			X		

