

## Comment Form

### Fourth Posting of the Draft Transmission Operator Certification Standards

This form is to be used to submit comments on the proposed revisions to ORG-001-008. Comments must be submitted by **February 15, 2006**. You may submit the completed form by e-mailing it to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the words "Proposed Revisions to Draft Transmission Operator Certification Standards" in the subject line. If you have questions please contact Mark Ladrow at [mark.ladrow@nerc.net](mailto:mark.ladrow@nerc.net) or by telephone at 609-452-8060.

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

<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Raynond Morella	
Organization:	FirstEnergy Corp	
Telephone:	330.384.5686	
E-mail:	morellar@firstenergycorp.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	X	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> MAPP	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input checked="" type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities

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

**Group Name:**

**Lead Contact:**

**Contact Organization:**

**Contact Segment:**

**Contact Telephone:**

**Contact E-mail:**

<b>Additional Member Name</b>	<b>Additional Member Organization</b>	<b>Region*</b>	<b>Segment*</b>

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

**Background Information:**

- To understand the Certification Standard Drafting Team’s philosophy used to create the standards, refer to the Transmission Operator Certification SAR, the Functional Model, and its Technical Discussion Document. These documents were used in the drafting of the standard and can be accessed at the following links:  
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- In this posting, the drafting team has referenced applicable Version 0 standards. Specific Version 0 standard requirements have not been included to allow for future modifications. A reference document is being developed by the drafting team and Organization Certification Working Group to identify appropriate Version 0 requirements applicable to certification.
- Also in the posting, Field Testing of the standards has been added to the timeline and development process.
- Based on the comments received during the previous posting of the Transmission Operator Certification standards, the drafting team has modified the standards to address the comments and to reference applicable Version 0 standards.

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

1. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Certification standard?**

Yes

No

Comments:

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

2. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Agreements standard?**

Yes

No

Comments:

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

3. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Personnel standard?**

Yes

No

Comments:

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

4. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Data Acquisition and Monitoring standard?**

X Yes

No

Comments:

**Standard – ORG-005-1 – Transmission Operator Certification – System Analysis**

5. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – System Analysis standard?**

X Yes

No

Comments:

**Standard – ORG-006-1 – Transmission Operator Certification – Emergency Operations**

6. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Emergency Operations standard?**

X Yes

No

Comments:

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

7. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Loss of Control Center Functionality standard?**

X Yes

No

Comments:

**Standard – ORG-008-1 – Transmission Operator Certification – Restoration**

8. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Restoration standard?**

X Yes

No

Comments:

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

Comments:

10. **Please identify any regional differences that should be included in the certification standards? (Please identify the standard, the requirement, and specific difference that need to be included in the requirement.)**

Comments:

11. **The drafting team believes that the Transmission Operator Certification standards are ready for ballot. Do you support this position?**

X Yes

No

Comments:

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E-mail:		
NERC Region		Registered Ballot Body Segment
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<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> MAPP	<input type="checkbox"/>	3 — Load-serving Entities
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Comment Form — Fourth Posting of the Draft Transmission Operator Certification Standards

<b>Group Comments (Complete this page if comments are from a group.)</b>			
<b>Group Name:</b>	NPCC CP9, Reliability Standards Working Group		
<b>Lead Contact:</b>	Guy V. Zito		
<b>Contact Organization:</b>	Northeast Power Coordinating Council		
<b>Contact Segment:</b>	2		
<b>Contact Telephone:</b>	212-840-1070		
<b>Contact E-mail:</b>	gzito@npcc.org		
<b>Additional Member Name</b>	<b>Additional Member Organization</b>	<b>Region*</b>	<b>Segment*</b>
Roger Champagne	TransEnergie (Quebec)	NPCC	1
Michael Shiavone	National Grid	NPCC	1
George Dunn	New York Power Authority	NPCC	1
David Kiguel	Hydro One Networks (Ontario)	NPCC	1
Kathleen Goodman	ISO-New England	NPCC	2
Greg Campoli	New York ISO	NPCC	2
Alan Adamson	New York State Rel. Council	NPCC	2
Donald Nelson	MA. Dept of Tel. and Energy	NPCC	9
Shashi Parekh	MA. Dept. of Tel. and Energy	NPCC	9
Brian Hogue	Northeast Power Coord. Council	NPCC	2
Guy V. Zito	Northeast Power Coord. Council	NPCC	2
Ron Falsetti	The IESO (Ontario)	NPCC	2
James Ingleson	New York ISO	NPCC	2

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

1. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Certification standard?**

- Yes  
 No

Comments: The Drafting Team (DT) is introducing a change in the definition of Agreement. NPCC participating members believe that the DT must assess the impact of the change in all the other standards where the same term is used. The DT should provide the list of all current standards that use the terms for which modified definitions are proposed and identify any impact that the change may have in those other standards.

Requirement R4. appears to limit the need for procedures, processes, etc. for the TOP to have these for the cyber security standards. This requirement should be extended to all the standards that require the TOP to adhere to applicable NERC Reliability Standards.

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

2. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Agreements standard?**

- Yes  
 No

Comments: Requirement R1 appears to address items other than information as opposed to what is stated in the introduction to the requirement.

R.1.1.6.1 refers only to FERC requirements. Consideration should be given to entities that are not under FERC’s jurisdiction. The requirement must be extended to include similar regulatory requirements in other jurisdictions.

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

3. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Personnel standard?**

- Yes

**Comment Form — Fourth Posting of the Draft Transmission Operator Certification Standards**

No

1. Comments: R3.1 3rd bullet: Notify Generator Operators of transmission system problems in compliance with FERC requirements: We submit the same comment as above on entities that are not under FERC's jurisdiction.
2. Measure M3 makes reference to a non-existent requirement R5.
3. Clarification is requested on the extent to which R2 applies to. The DT should clarify the staff that needs to be certified, e.g. person giving the switching order vs. person implementing the switching operation. Also, personnel working in the back office, e.g. doing Outage Planning, do they have to be Certified?

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

4. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Data Acquisition and Monitoring standard?

Yes

No

Comments:

**Standard – ORG-005-1 – Transmission Operator Certification – System Analysis**

5. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – System Analysis standard?

Yes

No

Comments:

**Standard – ORG-006-1 – Transmission Operator Certification – Emergency Operations**

6. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Emergency Operations standard?

Yes

No

Comments:

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

7. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Loss of Control Center Functionality standard?

Yes

No

Comments:

**Standard – ORG-008-1 – Transmission Operator Certification – Restoration**

8. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Restoration standard?**

Yes

No

Comments:

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

Comments:

10. **Please identify any regional differences that should be included in the certification standards? (Please identify the standard, the requirement, and specific difference that need to be included in the requirement.)**

Comments:

11. **The drafting team believes that the Transmission Operator Certification standards are ready for ballot. Do you support this position?**

Yes

No

Comments: Please refer to the questions above.

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Ron Falsetti	
Organization:	IESO	
Telephone:	905-855-6187	
E-mail:	ron.falsetti@ieso.ca	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
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1. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Certification standard?**

Yes

No

Comments: *R4: It is the IESO's view a Transmission Operator should have procedures, processes and tools in place for adhering to **all** applicable NERC reliability standards. By singling out the need to adhere to Cyber Security begs the question on the need to adhere to other reliability requirements*

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

2. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Agreements standard?**

Yes

No

Comments:

- (i) *R1: The added sentence " **The entities identified below are the typical information sources, however the information identified can be obtained from alternative sources and must be identified in the appropriate agreements.**" is confusing. Does it mean that the data identified can be (a) obtained from the sources listed in R1.2 to 1.7, below, or other alternative sources, and (b) the data must be clearly specified in the agreements with these listed sources and the other alternative sources where the data is obtained? Please clarify.*

*The IESO interprets that R1.1 to R1.7 list the elements that must be included in the agreements between the TOP and its counterparts to clearly define responsibilities and authorities. Some of these elements contain data provision requirements but some do not. Further, R1.1 lists the data "to be provided" by the TOP rather than "to be obtained by" TOP. The added sentence noted above therefore seems to be a little out of place and creates more confusion than it's intended to serve.*

*If the intent is to indicate that the data can be obtained from alternative sources and that similar agreements must be established between the TOP and the alternative sources, then we'd suggest that this intent be stipulated after R1.7.*

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- (ii) *Alternative, we recommend that the structure used for the **BA Certification - Agreements** standard be considered for use in the TOP Certification - Agreements standard. Please see our comments on the BA Certification Standards.*
- (iii) *R1.1.6: “in compliance with FERC requirements” does not apply to Canadian entities. Please revise (for example, by adding “or other applicable regulatory requirements”.)*

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

3. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Personnel standard?**

Yes

No

Comments:

- (i) *R3.1: “in compliance with FERC requirements” does not apply to Canadian entities. Please revise (for example, by adding “or other applicable regulatory requirements”.)*
- (ii) *M3: Please revise last part of sentence “...personnel identified in Requirement R4.” as R5 doesn't exist.*

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

4. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Data Acquisition and Monitoring standard?**

Yes

No

**Standard – ORG-005-1 – Transmission Operator Certification – System Analysis**

5. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – System Analysis standard?**

Yes

No

Comments:

**Standard – ORG-006-1 – Transmission Operator Certification – Emergency Operations**

6. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Emergency Operations standard?**

Yes

No

Comments:

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

**Comment Form — Fourth Posting of the Draft Transmission Operator Certification Standards**

7. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Loss of Control Center Functionality standard?**

Yes

No

Comments:

**Standard – ORG-008-1 – Transmission Operator Certification – Restoration**

8. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Restoration standard?**

Yes

No

Comments:

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

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Comments:

11. **The drafting team believes that the Transmission Operator Certification standards are ready for ballot. Do you support this position?**

Yes

No

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

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

Group Name: Operating Reliability Working Group (ORWG)

Lead Contact: Robert Rhodes, Secretary

Contact Organization: Southwest Power Pool

Contact Segment:

Contact Telephone: 501-614-3241

Contact E-mail: [rrhodes@spp.org](mailto:rrhodes@spp.org)

Additional Member Name	Additional Member Organization	Region*	Segment*
Jason Atwood	Calpine	SPP	6
Dan Boezio	AEP	SPP	1
Bob Cochran	SPS	SPP	1
Mike Gammon	KCP&L	SPP	1
Allen Klassen	Westar	SPP	1
Robert Rhodes	SPP	SPP	2
Randy Root	GRDA	SPP	1

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No

Comments:

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

Comments:

10. **Please identify any regional differences that should be included in the certification standards? (Please identify the standard, the requirement, and specific difference that need to be included in the requirement.)**

Comments:

11. **The drafting team believes that the Transmission Operator Certification standards are ready for ballot. Do you support this position?**

Yes

No

Comments:

## Comment Form

### Fourth Posting of the Draft Transmission Operator Certification Standards

This form is to be used to submit comments on the proposed revisions to ORG-001-008. Comments must be submitted by **February 15, 2006**. You may submit the completed form by e-mailing it to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the words "Proposed Revisions to Draft Transmission Operator Certification Standards" in the subject line. If you have questions please contact Mark Ladrow at [mark.ladrow@nerc.net](mailto:mark.ladrow@nerc.net) or by telephone at 609-452-8060.

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

**DO:**

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

**DO NOT:**

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

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

Comment Form – Fourth Posting of the Draft Transmission Operator Certification Standards

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

**Group Name:** Southern Company – Transmission

**Lead Contact:** Marc M. Butts

**Contact Organization:** Southern Company Services

**Contact Segment:** 1

**Contact Telephone:** 205-257-4839

**Contact E-mail:** [mmbutts@southernco.com](mailto:mmbutts@southernco.com)

<b>Additional Member Name</b>	<b>Additional Member Organization</b>	<b>Region*</b>	<b>Segment*</b>
Jim Busbin	Southern Company Services	SERC	1
Raymond Vice	Southern Company Services	SERC	1
Jim Viikinsalo	Southern Company Services	SERC	1
Jim Griffith	Southern Company Services	SERC	1
Phil Winston	Georgia Power Company	SERC	3
Wade Pugh	Southern Company Services	SERC	1
Doug McLaughlin	Southern Company Services	SERC	1
Mike Oatts	Southern Company Services	SERC	1

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

**Background Information:**

- To understand the Certification Standard Drafting Team's philosophy used to create the standards, refer to the Transmission Operator Certification SAR, the Functional Model, and its Technical Discussion Document. These documents were used in the drafting of the standard and can be accessed at the following links:  
[ftp://www.nerc.com/pub/sys/all\\_updl/standards/sar/TOP\\_CERTIFICATION\\_01\\_03.pdf](ftp://www.nerc.com/pub/sys/all_updl/standards/sar/TOP_CERTIFICATION_01_03.pdf)  
<http://www.nerc.com/~filez/functionalmodel.html>
- In this posting, the drafting team has referenced applicable Version 0 standards. Specific Version 0 standard requirements have not been included to allow for future modifications. A reference document is being developed by the drafting team and Organization Certification Working Group to identify appropriate Version 0 requirements applicable to certification.
- Also in the posting, Field Testing of the standards has been added to the timeline and development process.
- Based on the comments received during the previous posting of the Transmission Operator Certification standards, the drafting team has modified the standards to address the comments and to reference applicable Version 0 standards.

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

1. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Certification standard?**

Yes

No

Comments:

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

2. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Agreements standard?**

Yes

No

Comments:

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

3. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Personnel standard?**

Yes

No

Comments:

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

4. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Data Acquisition and Monitoring standard?**

Yes

No

Comments:

**Standard – ORG-005-1 – Transmission Operator Certification – System Analysis**

5. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – System Analysis standard?**

Yes

No

Comments:

**Standard – ORG-006-1 – Transmission Operator Certification – Emergency Operations**

6. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Emergency Operations standard?**

Yes

No

Comments:

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

7. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Loss of Control Center Functionality standard?**

Yes

No

Comments:

**Standard – ORG-008-1 – Transmission Operator Certification – Restoration**

8. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Restoration standard?**

Yes

No

Comments:

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

Comments:

10. **Please identify any regional differences that should be included in the certification standards? (Please identify the standard, the requirement, and specific difference that need to be included in the requirement.)**

Comments:

11. **The drafting team believes that the Transmission Operator Certification standards are ready for ballot. Do you support this position?**

Yes

No

Comments:

## Comment Form

### Fourth Posting of the Draft Transmission Operator Certification Standards

This form is to be used to submit comments on the proposed revisions to ORG-001-008. Comments must be submitted by **February 16, 2006**. You may submit the completed form by e-mailing it to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the words "Proposed Revisions to Draft Transmission Operator Certification Standards" in the subject line. If you have questions please contact Mark Ladrow at [mark.ladrow@nerc.net](mailto:mark.ladrow@nerc.net) or by telephone at 609-452-8060.

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Neil Shockey	
Organization:	Southern California Edison	
Telephone:	626-302-4604	
E-mail:	neil.shockey@sce.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> MAPP	<input type="checkbox"/>	3 — Load-serving Entities
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<input checked="" type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
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**Comment Form — Fourth Posting of the Draft Transmission Operator Certification Standards**

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

**Group Name:**

**Lead Contact:**

**Contact Organization:**

**Contact Segment:**

**Contact Telephone:**

**Contact E-mail:**

Additional Member Name	Additional Member Organization	Region*	Segment*

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

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- To understand the Certification Standard Drafting Team’s philosophy used to create the standards, refer to the Transmission Operator Certification SAR, the Functional Model, and its Technical Discussion Document. These documents were used in the drafting of the standard and can be accessed at the following links:  
[ftp://www.nerc.com/pub/sys/all\\_updl/standards/sar/TOP\\_CERTIFICATION\\_01\\_03.pdf](ftp://www.nerc.com/pub/sys/all_updl/standards/sar/TOP_CERTIFICATION_01_03.pdf)  
<http://www.nerc.com/~filez/functionalmodel.html>
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**Standard – ORG-001-1 – Transmission Operator Certification – Certification**

1. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Certification standard?**

- Yes  
 No

Comments: For R.3, a Transmission Operator may delegate tasks, but shall retain responsibility for all tasks. Clarification is requested on what is meant by “responsible” in the context of this requirement. Is the TOP held financially liable for delegated tasks? Is the TOP responsible for enforcement penalties and sanctions under Section 215 of the FPA? To what is the TOP held responsible for under Requirement R3?

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

2. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Agreements standard?**

- Yes  
 No

Comments: For R.1.1.6, there can be no guarantee that the transmission system will support generator facility limits. The generator should have sufficient protection in place to trip the unit when the generator limits are exceeded. For R1.1.6.1, although not stated SCE assumes that this is FERC Standards of Conduct requirements and requests clarification. For R1.1.10, voltage reduction is not universally used during capacity shortages, this is mainly used in the Eastern Interconnection. Request the use of "if applicable" all places throughout the certification standard where voltage reduction is used. For R1.5, voltage reduction is not universally used during capacity shortages, this is mainly used in the Eastern Interconnection. Request the use of "if applicable" all places throughout the certification standard where voltage reduction is used.

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

3. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Personnel standard?**

- Yes  
 No

**Comment Form — Fourth Posting of the Draft Transmission Operator Certification Standards**

Comments: Voltage reduction is not universally used during capacity shortages, this is mainly used in the Eastern Interconnection. Request the use of "if applicable" all places throughout the certification standard where voltage reduction is used. Also, although not stated SCE assumes that the third bullet of Requirement R3.1 refers to FERC Standards of Conduct requirements and requests clarification.

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

4. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Data Acquisition and Monitoring standard?**

Yes

No

Comments: For R.2, please explain why "and" was changed to "or". Also, please define "Generator Facility Data." Is this facility ratings? For R3 and throughout, please define the difference between a process and a procedure. General expectation is that a process does not have to be a step by step situation that is written down which would be the case for a procedure. How do you audit a process unless there is an associated procedure? For R4, Procedures, processes and tools are an inclusive requirement. This does not comport with the action of "monitoring". Some aspects of monitoring do not require processes, procedures and tools. Just tools.

**Standard – ORG-005-1 – Transmission Operator Certification – System Analysis**

5. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – System Analysis standard?**

Yes

No

Comments:

**Standard – ORG-006-1 – Transmission Operator Certification – Emergency Operations**

6. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Emergency Operations standard?**

Yes

No

Comments:

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

7. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Loss of Control Center Functionality standard?**

Yes

No

Comments: The requirement is to have procedures, processes, tools, or facilities to continue operations.....etc. As it is written, if you have a facility, you do not need any procedures or processes. Recommend revising this requirement to include "or a facility with procedures to continue....."

**Standard – ORG-008-1 – Transmission Operator Certification – Restoration**

8. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Restoration standard?**

Yes

No

Comments:

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

Comments:

10. **Please identify any regional differences that should be included in the certification standards? (Please identify the standard, the requirement, and specific difference that need to be included in the requirement.)**

Comments:

11. **The drafting team believes that the Transmission Operator Certification standards are ready for ballot. Do you support this position?**

Yes

No

Comments:

## Comment Form

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(Complete this page for comments from one organization or individual.)		
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Organization:		
Telephone:		
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NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
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<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities

Comment Form — Fourth Posting of the Draft Transmission Operator Certification Standards

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

**Group Name:** FRCC

**Lead Contact:** Eric Senkowicz

**Contact Organization:** FRCC

**Contact Segment:** 2

**Contact Telephone:** 813-289-5644

**Contact E-mail:** esenkowicz@frcc.com

<b>Additional Member Name</b>	<b>Additional Member Organization</b>	<b>Region*</b>	<b>Segment*</b>
Linda Campbell	FRCC	FRCC	2
Alan Gale	City Of Tallahassee	FRCC	5
Steve Wallace	Seminole Electric Cooperative	FRCC	4
Greg Woessner	Kissimmee Utility Authority	FRCC	3
Ed DeVarona	Florida Power & Light	FRCC	1
Pedro Modia	Florida Power & Light	FRCC	1
Mark Bennett	Gainesville Regional Utilities	FRCC	5

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

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<http://www.nerc.com/~filez/functionalmodel.html>
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**Standard – ORG-001-1 – Transmission Operator Certification – Certification**

1. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Certification standard?**

- Yes  
 No

Comments: **See overall comment below on converting certification standards to a non-standards process (response to #11).**

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

2. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Agreements standard?**

- Yes  
 No

Comments: **See overall comment below on converting certification standards to a non-standards process (response to #11).**

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

3. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Personnel standard?**

- Yes  
 No

Comments: **See overall comment below on converting certification standards to a non-standards process (response to #11).**

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

4. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Data Acquisition and Monitoring standard?**

Yes

No

Comments: **See overall comment below on converting certification standards to a non-standards process (response to #11).**

**Standard – ORG-005-1 – Transmission Operator Certification – System Analysis**

5. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – System Analysis standard?**

Yes

No

Comments: **See overall comment below on converting certification standards to a non-standards process (response to #11).**

**Standard – ORG-006-1 – Transmission Operator Certification – Emergency Operations**

6. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Emergency Operations standard?**

Yes

No

Comments: **See overall comment below on converting certification standards to a non-standards process (response to #11).**

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

7. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Loss of Control Center Functionality standard?**

Yes

No

Comments: **See overall comment below on converting certification standards to a non-standards process (response to #11).**

**Standard – ORG-008-1 – Transmission Operator Certification – Restoration**

8. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Restoration standard?**

Yes

No

Comments: **See overall comment below on converting certification standards to a non-standards process (response to #11).**

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

Comments: **None**

**10. Please identify any regional differences that should be included in the certification standards? (Please identify the standard, the requirement, and specific difference that need to be included in the requirement.)**

Comments: **None**

**11. The drafting team believes that the Transmission Operator Certification standards are ready for ballot. Do you support this position?**

Yes

No

Comments:

**Current "Certification Standards" content and methodology should be converted to a controlled process outside of the NERC Reliability standards process.**

The FRCC appreciates the drafting team's efforts at eliminating our synchronization concerns by including "requirements by reference" in the current drafts. Notwithstanding, during the subsequent review of these drafts along with the accelerated changes formulated by the Energy Policy Act of 2005, the FRCC sees a significant change in the entity "certification" landscape which forces us to recommend against further development of these "certification" standards.

Further we recommend that the purpose, content and methodology captured and documented by these draft standards, be used to populate and refine the "NERC Organization Registration and Certification Manual" (NORCM) as proposed in the NERC draft ERO application. Because of the duplicative and wasteful nature of a unique, "stand-alone", "certification" process, we would also favor a "certification" concept that is closely integrated into the "compliance" organization and structure in order to derive the most benefit from any "certification" process.

*The following is an excerpt from the NERC Draft 2 ERO application and illustrates the vision of the "certification" process within the ERO;*

**SECTION 500 — ORGANIZATION REGISTRATION AND CERTIFICATION**

**501. Scope of the Organization Registration and Certification Program**

*NERC shall develop and maintain an organization registration and certification program for the purpose of promoting compliance with reliability standards and enhancing the reliability of the bulk power system. The program's name includes the term "registration", however, the program does not imply and will not solicit or in any manner impose a requirement for membership in NERC or in any RRO, for any organization involved in it. Organization registration and certification may be delegated to RROs in accordance with the procedures in its Section 500, the NERC Organization Registration and Certification Manual, which is incorporated into these rules as **Appendix 6**, and approved RRO delegation agreements.*

From a process and documentation basis the FRCC feels that the energy legislation along with the ERO development provide a sound basis for establishing a formal "certification process" outside of the NERC Reliability Standards process. This will preserve the sanctity, clarity and uniformity of the Reliability Standards process and keep it focused on performance requirements while allowing the "process" type requirements associated with certifying an entity to be developed independently and unfettered, under the purview of the NERC Compliance and Certification Committee (CCC). Logistically, this will also prevent duplication of requirements, eliminate the concern of synchronization between standards and limit the scope of the "certification" process to interpreting standards and not creating standards that may inadvertently create additional reliability requirements within them.

The landscape is changing, and includes the development of the ERO along with the NORCM. These factors may not have been envisioned back in 2002, when the Standards Authorization Requests (SARs) were initially submitted which requested the development of these “certification” standards. In the evolving nature of the industry, the development of the ERO along with enforceable standards compliance, it is becoming more important to provide clear processes with distinct standards to evaluate adherence to these standards. The following is an excerpt from the proposed “NERC Organization Registration and Certification Manual” which illustrates the role and make-up of the CCC, with respect to the “certification” process:

(NERC CCC) “...is responsible for developing and approving these processes (registration and certification). The CCC is comprised of representatives from a diverse set of industry segments and therefore represents the industry as a whole. Industry participants have input into the development and revision of this process through their segment representatives on the CCC.”

Inherently, the content and processes of these proposed “certification” standards should be part of the CCC scope and integrated into the NORCM. Currently the “certification” standards development as independent Reliability standards is duplicative, creates unnecessary documentation and introduces a host of potential synchronization issues.

Taking a wider view, the FRCC would also favor a closer relationship between the “certification” process and the “compliance” process. It is apparent to us that the real benefits to reliability will come about by ensuring compliance to Reliability Standards. As a result, the processes associated with “compliance” will become the primary drivers to reliable grid operations. Therefore the real benefits of a “certification” process would be in a “certification” that is closely integrated within the “compliance” programs. The organizational “certification” process should be intertwined with “compliance” goals and not off on its own organizational tangent with “certification” being performed as a one-time endeavor.

In summary, the FRCC maintains that adequate, formal “certification” processes will exist in the future and that current “certification” standards development is becoming duplicative and may introduce ambiguity into the Reliability Standards process and its requirements. Furthermore the FRCC would encourage that further development on the “certification” standards should be focused on refining the proposed ERO documents, governing “certification”, outside of the NERC Reliability Standards processes. The FRCC also favors a “certification” process that is based on “compliance” principles and structure and not as a stand-alone tangent organization wielding a “single-use” rubberstamp.

## Comment Form

### Fourth Posting of the Draft Transmission Operator Certification Standards

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<b>Individual Commenter Information</b>		
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Organization:		
Telephone:		
E-mail:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
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**Comment Form — Fourth Posting of the Draft Transmission Operator Certification Standards**

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

**Group Name:** Midwest Reliability Organization (MRO)  
**Lead Contact:** Todd Gosnell  
**Contact Organization:** MRO for Group  
**Contact Segment:** 2  
**Contact Telephone:** 402-552-5670  
**Contact E-mail:** wgosnell@oppd.com

<b>Additional Member Name</b>	<b>Additional Member Organization</b>	<b>Region*</b>	<b>Segment*</b>
Al Boesch	NPPD	MRO	2
Terry Bilke	MISO	MRO	2
Robert Coish	MHEB	MRO	2
Dennis Florom	LES	MRO	2
Ken Goldsmith	ALT	MRO	2
Wayne Guttormson	SPC	MRO	2
Jim Maenner	WPSC	MRO	2
Tom Mielnik	MEC	MRO	2
Darrick Moe, Chair	WAPA	MRO	2
Pam Oreschnick	XEL	MRO	2
Dick Pursley	GRE	MRO	2
Dave Rudolph	BEPC	MRO	2
Joe Knight, Secretary	MRO	MRO	2
<b>27 Additional MRO Members</b>	<b>Companies not named above</b>	<b>MRO</b>	<b>2</b>

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

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

1. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Certification standard?**

Yes

No

Comments:

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

2. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Agreements standard?**

Yes

No

Comments:

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

3. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Personnel standard?**

Yes

No

Comments:

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

4. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Data Acquisition and Monitoring standard?

Yes

No

Comments:

**Standard – ORG-005-1 – Transmission Operator Certification – System Analysis**

5. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – System Analysis standard?

Yes

No

Comments:

**Standard – ORG-006-1 – Transmission Operator Certification – Emergency Operations**

6. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Emergency Operations standard?

Yes

No

Comments:

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

7. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Loss of Control Center Functionality standard?

Yes

No

Comments:

**Standard – ORG-008-1 – Transmission Operator Certification – Restoration**

8. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Restoration standard?**

Yes

No

Comments:

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

Comments: None

10. **Please identify any regional differences that should be included in the certification standards? (Please identify the standard, the requirement, and specific difference that need to be included in the requirement.)**

Comments: None

11. **The drafting team believes that the Transmission Operator Certification standards are ready for ballot. Do you support this position?**

Yes

No

Comments:

## Comment Form

### Fourth Posting of the Draft Transmission Operator Certification Standards

This form is to be used to submit comments on the proposed revisions to ORG-001-008. Comments must be submitted by **February 16, 2006**. You may submit the completed form by e-mailing it to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the words "Proposed Revisions to Draft Transmission Operator Certification Standards" in the subject line. If you have questions please contact Mark Ladrow at [mark.ladrow@nerc.net](mailto:mark.ladrow@nerc.net) or by telephone at 609-452-8060.

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

<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Peter Burke [on behalf of ATC's Jason Shaver]	
Organization:	American Transmission Company LLC ATC	
Telephone:	262-506-6863	
E-mail:	PBurke@atcllc.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
<input checked="" type="checkbox"/> MAPP	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input checked="" type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities

**Comment Form – Fourth Posting of the Draft Transmission Operator Certification Standards**

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

**Group Name:**

**Lead Contact:**

**Contact Organization:**

**Contact Segment:**

**Contact Telephone:**

**Contact E-mail:**

Additional Member Name	Additional Member Organization	Region*	Segment*

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

1. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Certification standard?**

- Yes  
 No

Comments: ATC does not agree with the Transmission Operator Certification - Agreements standard.

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

2. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Agreements standard?**

- Yes  
 No

1. Comments: The modifications to the term “Agreement” have not alleviated ATC’s concerns that this requirement creates the potential for legal blackmail. The RC, BA and TOP entities are the only entities that will be penalized for not joining into the required agreements. Until all other entities are required to certify and have reciprocal agreements, the RC, BA and TOP should be exempt from the requirement to enter into the specified agreements.
2. ATC suggests that an entity should be certified as a RC, BA or TOP if it can demonstrate that it can satisfy all of NERC’s requirements pertaining to that function. This process should not be a test to demonstrate the ability to enter into agreements, but a review that all pertinent requirements are initially satisfied.

Once an entity has gone through this process and is certified, it is required to show continual compliance to NERC requirements. This initial certification process should reflect that reality.

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

3. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Personnel standard?**

- Yes  
 No

**Comment Form — Fourth Posting of the Draft Transmission Operator Certification Standards**

Comments:

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

4. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Data Acquisition and Monitoring standard?

Yes

No

Comments:

**Standard – ORG-005-1 – Transmission Operator Certification – System Analysis**

5. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – System Analysis standard?

Yes

No

Comments:

**Standard – ORG-006-1 – Transmission Operator Certification – Emergency Operations**

6. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Emergency Operations standard?

Yes

No

Comments:

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

7. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Loss of Control Center Functionality standard?

Yes

No

Comments:

**Standard – ORG-008-1 – Transmission Operator Certification – Restoration**

8. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Restoration standard?**

Yes

No

Comments:

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

Comments:

10. **Please identify any regional differences that should be included in the certification standards? (Please identify the standard, the requirement, and specific difference that need to be included in the requirement.)**

Comments:

11. **The drafting team believes that the Transmission Operator Certification standards are ready for ballot. Do you support this position?**

Yes

No

Comments:

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

<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	David Kiguel	
Organization:	Hydro One Networks Inc.	
Telephone:	416-345-5313	
E-mail:	David.Kiguel@HydroOne.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> MAPP	<input checked="" type="checkbox"/>	3 — Load-serving Entities
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<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
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**Lead Contact:**

**Contact Organization:**

**Contact Segment:**

**Contact Telephone:**

**Contact E-mail:**

Additional Member Name	Additional Member Organization	Region*	Segment*

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

1. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Certification standard?**

- Yes  
 No

Comments: The Drafting Team (DT) has introduced a modified definition of the term Agreement to replace the current definition in the NERC Glossary of Terms. We believe that, while the new definition might be appropriate, the DT must assess the impact of the change in all the other standards that use the same term. As a minimum, the DT should provide the list of all current standards that use the terms for which modified definitions are proposed and identify any impact that the change may have in those other standards.

Requirement R4. appears to limit the need for procedures, processes, etc. for the TOP to have these for the cyber security standards. This requirement should be extended to all the standards that require the TOP to adhere to applicable NERC Reliability Standards.

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

2. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Agreements standard?**

- Yes  
 No

Comments: Requirement R1 appears to address items other than information as opposed to what is stated in the introduction to the requirement. Hydro One suggests that the R1 reads as follows:

"R1. The Transmission Operator shall have agreements that define the responsibilities and authority of that Transmission Operator with respect to its Reliability Coordinator, Generator Owner(s), Generator Operator(s), Planning Authority(ies), Distribution Provider(s), Transmission Owner(s), Transmission Service Provider(s), Balancing Authority(ies), Transmission Planner(s), and adjacent Transmission Operator(s). The agreements must address:"

R.1.1.6.1 refers only to FERC requirements. Consideration should be given to entities that are not under FERC's jurisdiction. The requirement must be extended to include similar regulatory requirements in other jurisdictions.

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

**3. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Personnel standard?**

Yes

No

1. Comments: R3.1 3rd bullet: "Notify Generator Operators of transmission system problems in compliance with FERC requirements." We submit the same comment as in question 2 above regarding entities that are not under FERC's jurisdiction.
2. Measure M3 makes reference to a non-existent requirement R5.
3. Clarification is requested on the extent to which requirement R2 applies to. The DT should clarify the staff that needs to be certified, as in the following examples: (a) person giving the switching order vs. person implementing the switching operation; (b) personnel working in the back office, e.g. doing Outage Planning, do they have to be Certified? The need for this clarification is the result to the allocation of TOP responsibilities in some jurisdictions: one entity directs the operation and another performs the sequence of switching operations to implement the direction in a safe and reliable manner.

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

4. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Data Acquisition and Monitoring standard?

Yes

No

Comments:

**Standard – ORG-005-1 – Transmission Operator Certification – System Analysis**

5. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – System Analysis standard?

Yes

No

Comments:

**Standard – ORG-006-1 – Transmission Operator Certification – Emergency Operations**

6. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Emergency Operations standard?

Yes

No

Comments:

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

7. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Loss of Control Center Functionality standard?

Yes

No

Comments: Delete footnotes 1 and 2 as they were left from deleted requirements in the previous version.

**Standard – ORG-008-1 – Transmission Operator Certification – Restoration**

8. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Restoration standard?**

Yes

No

Comments:

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

Comments:

10. **Please identify any regional differences that should be included in the certification standards? (Please identify the standard, the requirement, and specific difference that need to be included in the requirement.)**

Comments:

11. **The drafting team believes that the Transmission Operator Certification standards are ready for ballot. Do you support this position?**

Yes

No

Comments: Please refer to the comments on the questions above.

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Jeffrey T. Baker	
Organization:	Cinergy	
Telephone:	513-287-3368	
E-mail:	jeff.baker@cinergy.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
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<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
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<input type="checkbox"/> SERC	<input checked="" type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
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<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
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Comments:

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Yes

No

Comments:

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	James H. Sorrels, Jr.	
Organization:	American Electric Power	
Telephone:	(614) 716-2370	
E-mail:	jhsorrels@AEP.com	
NERC Region		Registered Ballot Body Segment
<input checked="" type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
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[ftp://www.nerc.com/pub/sys/all\\_updl/standards/sar/TOP\\_CERTIFICATION\\_01\\_03.pdf](ftp://www.nerc.com/pub/sys/all_updl/standards/sar/TOP_CERTIFICATION_01_03.pdf)  
<http://www.nerc.com/~filez/functionalmodel.html>
- In this posting, the drafting team has referenced applicable Version 0 standards. Specific Version 0 standard requirements have not been included to allow for future modifications. A reference document is being developed by the drafting team and Organization Certification Working Group to identify appropriate Version 0 requirements applicable to certification.
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- Based on the comments received during the previous posting of the Transmission Operator Certification standards, the drafting team has modified the standards to address the comments and to reference applicable Version 0 standards.

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

1. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Certification standard?**

Yes

No

Comments:

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

2. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Agreements standard?**

Yes

No

Comments: AEP is concerned with section B.R1. wherein numerous parties are identified for agreements with the Transmission Operator. While this is acceptable for small organizations, single corporate entities should be exempted from internal agreements as multiple duties may be performed by the same individual or within organizational units. These standards should not impose a defined organizational structure on a corporate entity.

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

3. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Personnel standard?**

Yes

No

Comments:

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

4. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Data Acquisition and Monitoring standard?**

X Yes

No

Comments:

**Standard – ORG-005-1 – Transmission Operator Certification – System Analysis**

5. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – System Analysis standard?**

X Yes

No

Comments:

**Standard – ORG-006-1 – Transmission Operator Certification – Emergency Operations**

6. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Emergency Operations standard?**

X Yes

No

Comments:

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

7. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Loss of Control Center Functionality standard?**

X Yes

No

Comments:

**Standard – ORG-008-1 – Transmission Operator Certification – Restoration**

**8. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Restoration standard?**

X Yes

No

Comments:

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

Comments:

**10. Please identify any regional differences that should be included in the certification standards? (Please identify the standard, the requirement, and specific difference that need to be included in the requirement.)**

Comments:

**11. The drafting team believes that the Transmission Operator Certification standards are ready for ballot. Do you support this position?**

Yes

X No

Comments: AEP supports that this standard is ready for ballot subject to the modifications requested in question 2.

## Comment Form

### Fourth Posting of the Draft Transmission Operator Certification Standards

This form is to be used to submit comments on the proposed revisions to ORG-001-008. Comments must be submitted by **February 16, 2006**. You may submit the completed form by e-mailing it to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the words "Proposed Revisions to Draft Transmission Operator Certification Standards" in the subject line. If you have questions please contact Mark Ladrow at [mark.ladrow@nerc.net](mailto:mark.ladrow@nerc.net) or by telephone at 609-452-8060.

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

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

**Group Comments (Complete this page if comments are from a group.)**  
**Group Name:**  
**Lead Contact:**  
**Contact Organization:**  
**Contact Segment:**  
**Contact Telephone:**  
**Contact E-mail:**

Additional Member Name	Additional Member Organization	Region*	Segment*

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

1. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Certification standard?**

- Yes  
 No

Comments: The Drafting Team (DT) is introducing a change in the definition of Agreement. ISO-NE believes that the DT must assess the impact of the change in all the other standards where the same term is used. The DT should provide the list of all current standards that use the terms for which modified definitions are proposed and identify any impact that the change may have in those other standards.

Requirement R4. appears to limit the need for the TOP to have procedures, processes, etc. for only the cyber security standards. This requirement should be extended to all the standards that require the TOP to adhere to applicable NERC Reliability Standards.

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

2. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Agreements standard?**

- Yes  
 No

Comments: Requirement R1 appears to address items other than information as opposed to what is stated in the introduction to the requirement.

R.1.1.6.1 refers only to FERC requirements. Consideration should be given to entities that are not under FERC’s jurisdiction. The requirement must be extended to include similar regulatory requirements in other jurisdictions.

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

3. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Personnel standard?**

- Yes

**Comment Form — Fourth Posting of the Draft Transmission Operator Certification Standards**

No

1. Comments: R3.1 3rd bullet: "Notify Generator Operators of transmission system problems in compliance with FERC requirements": We submit the same comment as above on entities that are not under FERC's jurisdiction.
2. Measure M3 makes reference to a non-existent requirement R5.
3. Clarification is requested on the extent to which R2 applies to. The DT should clarify the staff that needs to be certified, e.g. person giving the switching order vs. person implementing the switching operation. Also, personnel working in the back office, e.g. doing Outage Planning, do they have to be Certified?

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

4. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Data Acquisition and Monitoring standard?**

Yes

No

Comments:

**Standard – ORG-005-1 – Transmission Operator Certification – System Analysis**

5. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – System Analysis standard?**

Yes

No

Comments:

**Standard – ORG-006-1 – Transmission Operator Certification – Emergency Operations**

6. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Emergency Operations standard?**

Yes

No

Comments:

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

7. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Loss of Control Center Functionality standard?**

Yes

No

Comments:

**Standard – ORG-008-1 – Transmission Operator Certification – Restoration**

8. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Restoration standard?**

Yes

No

Comments:

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

Comments:

10. **Please identify any regional differences that should be included in the certification standards? (Please identify the standard, the requirement, and specific difference that need to be included in the requirement.)**

Comments:

11. **The drafting team believes that the Transmission Operator Certification standards are ready for ballot. Do you support this position?**

Yes

No

Comments: Please refer to the comments on the questions above.

## Comment Form Fourth Posting of the Draft Transmission Operator Certification Standards

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

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

**Comment Form — Fourth Posting of the Draft Transmission Operator Certification Standards**

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

**Group Name:** ISO/RTO Council

**Lead Contact:** Bruce Balmat

**Contact Organization:** PJM

**Contact Segment:** 2

**Contact Telephone:** 610-666-8860

**Contact E-mail:** balmatbm@pjm.com

<b>Additional Member Name</b>	<b>Additional Member Organization</b>	<b>Region*</b>	<b>Segment*</b>
Anita Lee	AESO		2
Charles Yeung	SPP		2
Sam Jones	ERCOT		2
Ron Falsetti	IESO		2
Peter Brandien	ISONE		2
Bill Phillips	MISO		2
Mike Calimano	NYISO		2

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

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

1. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Certification standard?**

- Yes  
 No

Comments: *R4: shouldn't a Transmission Operator have in place procedures, processes and tools for adhering to **all** applicable NERC reliability standards. By singling out the need to adhere to Cyber Security begs the question on the need to adhere to other reliability requirements*

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

2. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Agreements standard?**

- Yes  
 No

Comments:

- (i) *R1: The added sentence " **The entities identified below are the typical information sources, however the information identified can be obtained from alternative sources and must be identified in the appropriate agreements.**" is confusing. Does it mean that the data identified can be (a) obtained from the sources listed in R1.2 to 1.7, below, or other alternative sources, and (b) the data must be clearly specified in the agreements with these listed sources and the other alternative sources where the data is obtained? Please clarify.*

*We interpret that R1.1 to R1.7 list the elements that must be included in the agreements between the TOP and its counterparts to clearly define responsibilities and authorities. Some of these elements contain data provision requirements but some do not. Further, R1.1 lists the data "to be provided" by the TOP rather than "to be obtained by" TOP. The added sentence noted above therefore seems to be a little out of place and creates more confusion than it's intended to serve.*

*If the intent is to indicate that the data can be obtained from alternative sources and that similar agreements must be established between the TOP and the alternative sources, then we'd suggest that this intent be stipulated after R1.7.*

**Comment Form — Fourth Posting of the Draft Transmission Operator Certification Standards**

- (ii) *Alternative, we recommend that the structure used for the **BA Certification - Agreements** standard be considered for use in the TOP Certification - Agreements standard. Please see our comments on the BA Certification Standards.*
- (iii) *R1.1.6: “in compliance with FERC requirements” does not apply to Canadian entities. Please revise (for example, by adding “or other applicable regulatory requirements”.)*

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

3. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Personnel standard?**

Yes

No

Comments:

- (i) *R3.1: “in compliance with FERC requirements” does not apply to Canadian entities. Please revise (for example, by adding “or other applicable regulatory requirements”.)*
- (ii) *M3: Please revise last part of sentence “...personnel identified in Requirement R4.” as R5 doesn't exist.*

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

4. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Data Acquisition and Monitoring standard?**

Yes

No

**Standard – ORG-005-1 – Transmission Operator Certification – System Analysis**

5. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – System Analysis standard?**

Yes

No

Comments:

**Standard – ORG-006-1 – Transmission Operator Certification – Emergency Operations**

6. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Emergency Operations standard?**

Yes

No

Comments: The reference to COM-001 in Requirement 2.1 should more properly come under Requirement 2 because the requirement to communicate applies to all the sub-requirements 2.1-2.7. Perhaps placing the reference to COM-001 in parenthesis after the word “communicating” in Requirement 2 would resolve this.

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

7. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Loss of Control Center Functionality standard?**

Yes

No

Comments:

**Standard – ORG-008-1 – Transmission Operator Certification – Restoration**

**8. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Restoration standard?**

Yes

No

Comments:

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

Comments:

**10. Please identify any regional differences that should be included in the certification standards? (Please identify the standard, the requirement, and specific difference that need to be included in the requirement.)**

Comments:

**11. The drafting team believes that the Transmission Operator Certification standards are ready for ballot. Do you support this position?**

Yes

No

Comments: *Once our above comments are addressed then we would consider these ready for balloting. Further, this standard should have an implementation plan and associated certification process. When implementing the process, consideration should be given to how the results of recently concluded audits might be included in order to minimize duplication of effort and redundancy in such audit/assessment/review/certification processes.*

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

<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Ed Davis	
Organization:	Entergy Services	
Telephone:	504-495-2635	
E-mail:	edavis@entergy.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> MAPP	<input type="checkbox"/>	3 — Load-serving Entities
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Comment Form — Fourth Posting of the Draft Transmission Operator Certification Standards

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

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**Lead Contact:**

**Contact Organization:**

**Contact Segment:**

**Contact Telephone:**

**Contact E-mail:**

<b>Additional Member Name</b>	<b>Additional Member Organization</b>	<b>Region*</b>	<b>Segment*</b>

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

1. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Certification standard?**

Yes

No

Comments:

R3 states that a TOP may delegate tasks but shall retain responsibility for all tasks. We suggest the term – [retain responsibility for the tasks](#) – be changed to - [retain responsibility for meeting the Standards requirements](#).

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

2. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Agreements standard?**

Yes

No

Comments:

The subject of R1 is that there will be agreements between the TOP and other entities that address responsibilities and authority. We suggest deleting the new sentence - [The entities identified below are the typical information sources, however the information identified can be obtained from alternate sources and must be identified in the appropriate agreements](#). - because it places an uncertain requirement on sources of information, rather than the agreements.

We also suggest deleting the remainder of the R1 and adding the following sentence:

*The agreements between the TOP and other entities must address the relationships required to meet the NERC standards.*

R1.1.2 should be deleted since it is redundant of R1.1.1, and more specifically, the provision of real-time operational data is not specifically stated in TOP-005 so that inclusion of R1.1.2 is an inappropriate new requirement on the TOP.

R1.1.3 should have the phrase – *transmission maintenance and construction plans* – replace by – *transmission outages* - since TOP-003 requires all transmission outages be reported to the RC and TOP-003 does not contain the phrase *transmission maintenance and construction plans*.

Please specify which V0 standard requires the two requirements in R1.1.6 and R1.1.6.1, or delete these requirements from these certification standards.

*R1.1.6. Operate the transmission system within the generator facility ratings.*

*R1.1.6.1. Notify Generator Operators of transmission system problems that may affect generator operation in compliance with FERC requirements.*

R1.1.11 should be revised to reflect V0 requirements since TOP-004 addresses facility ratings, but neither TOP-003 nor TOP-004 address - *transmission maintenance and construction plans*. Therefore, we suggest the wording of R1.1.11 be revised to – *R1.1.11 Obtain facility ratings as identified in TOP-004.*

Please specify the V0 standard that requires R1.3 the Generator Owner’s requirement to provide voltage support or delete this requirement from these certification standards.

Please specify the V0 standard that requires R1.6 the Transmission Planner’s commitment concerning system protection and control information or delete these requirements from these certification standards.

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

3. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Personnel standard?**

Yes

No

Comments:

R3 should be deleted since it is repetitive of, and more limiting than, ORG-001-1 R3. The delegation of tasks is not unique to this standard and the certification requirement of those personnel performing delegated tasks should be specified in the V0 standard, not in a certification standard. Finally, a list of

**Comment Form — Fourth Posting of the Draft Transmission Operator Certification Standards**

those tasks that can be delegated should be specified in the V0 standard, not in a certification standard. And, we suggest that all tasks can be delegated so there is no need to list individually those that can be delegated.

R5 places training requirements not in the PER-002 V0 Standards on entities to whom tasks have been delegated. While this requirement may be desirable it is not appropriate to introduce new requirements in these ORG standards when those requirements should be in the V0 standards (in this case, one of the PER standards). Please delete R5 from ORG-003-1.

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

4. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Data Acquisition and Monitoring standard?

Yes

No

Comments:

Please specify which V0 standard requires R1, or delete these requirements from these certification standards.

*R1. The Transmission Operator shall have data acquisition requirements for its Transmission Operator Area that include: periodicity of transmittal, format of submission, and time frame.*

R3.2 should have the phrase – *transmission maintenance and construction plans* – replace by – *transmission outages* - since TOP-003 requires all transmission outages be reported to the RC and TOP-003 does not contain the phrase *transmission maintenance and construction plans*.

**Standard – ORG-005-1 – Transmission Operator Certification – System Analysis**

5. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – System Analysis standard?

Yes

No

Comments:

No specific comments on this standard at this time.

**Standard – ORG-006-1 – Transmission Operator Certification – Emergency Operations**

6. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Emergency Operations standard?

Yes

No

Comments:

Please delete R2.7 since the Transmission Operator is not directed to shed load by the BA nor the RC in EOP-003.

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

**Comment Form — Fourth Posting of the Draft Transmission Operator Certification Standards**

7. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Loss of Control Center Functionality standard?**

Yes

No

Comments:

No specific comments on this standard at this time.

**Standard – ORG-008-1 – Transmission Operator Certification – Restoration**

8. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Restoration standard?**

Yes

No

Comments:

No specific comments on this standard at this time.

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

Comments: Please see our response to #11 below.

10. **Please identify any regional differences that should be included in the certification standards? (Please identify the standard, the requirement, and specific difference that need to be included in the requirement.)**

Comments:

No specific comments on this standard at this time.

11. **The drafting team believes that the Transmission Operator Certification standards are ready for ballot. Do you support this position?**

Yes

No

Comments:

**STOP DEVELOPMENT OF AND WITHDRAW THESE STANDARDS**

We strongly recommend that further development of these TOP, BA, and RC organization standards be stopped and the request for standards be withdrawn since they are unnecessary.

The scope of the originating SARs for this group of standards is for the entity to demonstrate that it has the processes, procedures, tools and agreements in place to demonstrate that it has the capability of performing the responsibilities assigned to that Function. The SAR contains three sections: 1) the primary steps in the certification process, 2) the certification process, and 3) the certification criteria.

The first two sections are now contained in the ERO draft FERC filing Appendix 6 – NERC Organization Registration and Certification Manual. Thus, their inclusion in these ORG standards is unnecessary.

The third section of the SAR contains a statement that the NERC Policies and Standards (pre-Version 0 Standards) must be adhered to. However, the Policies and Standards have been replaced by permanent standards. Also, this third section contains a very limited set of requirements an entity must meet to be certified. The drafting team response to the FRCC comment states – not all of the requirements included in Version 0 Standards will be included in the elements of certification – see BA\_CERT\_D4\_COMMENT\_RESPONSES.pdf on the NERC website. We disagree with the drafting team response. Using a limited set of requirements is an inappropriate approach to certification. An entity

seeking certification is responsible for meeting all requirements of the NERC standards just like all the existing entities are required. Also, any and all requirements that could be included in the organization standards are already included in the current Standards and should not be repeated in these ORG certification standards.

These ORG certification standards and the requirement to adhere to all of the NERC Standards have been superseded by the Appendix 6 – NERC Organization Registration and Certification Manual. Therefore, we strongly recommend that further development of these TOP, BA, and RC organization standards be stopped and the request for standards be withdrawn since they are unnecessary.

### **REPLACE EXISTING DRAFT WITH ONE STANDARD FOR EACH ENTITY**

If these draft standards are not withdrawn, then we recommend replacing all these draft standards with one organization certification standard for each entity. This one standard will eliminate duplication of requirements, include all current Standard requirements, and avoid creating new requirements or not including existing requirements.

This one standard for the TOP would be created by replacing ORG-001-1, R1 with the following:

The entity that intends to perform the transmission operation function shall obtain certification as a NERC Transmission Operator by satisfying all the requirements identified in all other current NERC Standards applicable to the Transmission Operator.

The remainder of ORG-001-1 would remain intact. However, ORG-002-1 through ORG-007-1 would be deleted.

This one standard for the BA would be created by replacing ORG-009-1, R1 with the following:

The entity that intends to perform the balancing function shall obtain certification as a NERC Balancing Authority by satisfying all the requirements identified in all other current NERC Standards applicable to the Balancing Authority.

The remainder of ORG-009-1 would remain intact. However, ORG-010-1 through ORG-018-1 would be deleted.

Finally, this one standard for the RC would be created by replacing ORG-020-1, R1 with the following:

The entity that intends to perform the Reliability Coordinator function shall obtain certification as a NERC Reliability Coordinator by satisfying all the requirements identified in all other current NERC Standards applicable to the Reliability Coordinator.

The remainder of ORG-020-1 would remain intact. However, ORG-021-1 through ORG-027-1 would be deleted.

### **FREQUENCY OF REVISION OF ORG STANDARDS**

The structure of these ORG standards will result in frequent revisions whenever a standard is retired or significantly revised. For instance, the INT standards are being significantly revised, renumbered, and will require these ORG standards to be revised when the existing references to INT are no longer valid.

We have also provided detailed comments on the drafts that have been presented.

## Comment Form Fourth Posting of the Draft Transmission Operator Certification Standards

This form is to be used to submit comments on the proposed revisions to ORG-001-008. Comments must be submitted by **February 15, 2006**. You may submit the completed form by e-mailing it to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the words "Proposed Revisions to Draft Transmission Operator Certification Standards" in the subject line. If you have questions please contact Mark Ladrow at [mark.ladrow@nerc.net](mailto:mark.ladrow@nerc.net) or by telephone at 609-452-8060.

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

**DO:**     **Do** enter text only, with no formatting or styles added.  
           **Do** use punctuation and capitalization as needed (except quotations).  
           **Do** use more than one form if responses do not fit in the spaces provided.  
           **Do** submit any formatted text or markups in a separate WORD file.

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

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

**Comment Form — Fourth Posting of the Draft Transmission Operator Certification Standards**

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

**Group Name:** Southern Company Generation  
**Lead Contact:** Roman Carter  
**Contact Organization:** Southern Company Generation  
**Contact Segment:** 6  
**Contact Telephone:** 205.257.6027  
**Contact E-mail:** [jrcarter@southernco.com](mailto:jrcarter@southernco.com)

Additional Member Name	Additional Member Organization	Region*	Segment*
Lucius Burris	Southern Generation	SERC	6
Roger Green	Southern Generation	SERC	5
Tom Higgins	Southern Generation	SERC	5
Clifford Shepard	Southern Generation	SERC	6
Terry Crawley	Southern Nuclear	SERC	5

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

**Background Information:**

- To understand the Certification Standard Drafting Team’s philosophy used to create the standards, refer to the Transmission Operator Certification SAR, the Functional Model, and its Technical Discussion Document. These documents were used in the drafting of the standard and can be accessed at the following links:  
[ftp://www.nerc.com/pub/sys/all\\_updl/standards/sar/TOP\\_CERTIFICATION\\_01\\_03.pdf](ftp://www.nerc.com/pub/sys/all_updl/standards/sar/TOP_CERTIFICATION_01_03.pdf)  
<http://www.nerc.com/~filez/functionalmodel.html>
- In this posting, the drafting team has referenced applicable Version 0 standards. Specific Version 0 standard requirements have not been included to allow for future modifications. A reference document is being developed by the drafting team and Organization Certification Working Group to identify appropriate Version 0 requirements applicable to certification.
- Also in the posting, Field Testing of the standards has been added to the timeline and development process.
- Based on the comments received during the previous posting of the Transmission Operator Certification standards, the drafting team has modified the standards to address the comments and to reference applicable Version 0 standards.

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

1. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Certification standard?**

Yes

No

Comments:

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

2. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Agreements standard?**

Yes

No

Comments:

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

3. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Personnel standard?**

Yes

No

Comments:

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

4. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Data Acquisition and Monitoring standard?**

X Yes

No

Comments:

**Standard – ORG-005-1 – Transmission Operator Certification – System Analysis**

5. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – System Analysis standard?**

X Yes

No

Comments:

**Standard – ORG-006-1 – Transmission Operator Certification – Emergency Operations**

6. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Emergency Operations standard?**

X Yes

No

Comments:

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

7. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Loss of Control Center Functionality standard?**

X Yes

No

Comments:

**Standard – ORG-008-1 – Transmission Operator Certification – Restoration**

**8. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Restoration standard?**

X Yes

No

Comments:

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

Comments:

**10. Please identify any regional differences that should be included in the certification standards? (Please identify the standard, the requirement, and specific difference that need to be included in the requirement.)**

Comments:

**11. The drafting team believes that the Transmission Operator Certification standards are ready for ballot. Do you support this position?**

X Yes

No

Comments: Southern Company Generation believes the drafting team has done an admirable job incorporating Industry opinions and recommendations into the certification standards. These certification standards, once balloted, will allow NERC (as the ERO) to quickly move forward with the registration process required under the ERO Final Rule and will ensure qualified entities will be performing the functions described in the Functional Model.

## Comment Form Fourth Posting of the Draft Transmission Operator Certification Standards

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

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

Comment Form — Fourth Posting of the Draft Transmission Operator Certification Standards

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

**Group Name:**

**Lead Contact:**

**Contact Organization:**

**Contact Segment:**

**Contact Telephone:**

**Contact E-mail:**

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

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

**Background Information:**

- To understand the Certification Standard Drafting Team’s philosophy used to create the standards, refer to the Transmission Operator Certification SAR, the Functional Model, and its Technical Discussion Document. These documents were used in the drafting of the standard and can be accessed at the following links:  
[ftp://www.nerc.com/pub/sys/all\\_updl/standards/sar/TOP\\_CERTIFICATION\\_01\\_03.pdf](ftp://www.nerc.com/pub/sys/all_updl/standards/sar/TOP_CERTIFICATION_01_03.pdf)  
<http://www.nerc.com/~filez/functionalmodel.html>
- In this posting, the drafting team has referenced applicable Version 0 standards. Specific Version 0 standard requirements have not been included to allow for future modifications. A reference document is being developed by the drafting team and Organization Certification Working Group to identify appropriate Version 0 requirements applicable to certification.
- Also in the posting, Field Testing of the standards has been added to the timeline and development process.
- Based on the comments received during the previous posting of the Transmission Operator Certification standards, the drafting team has modified the standards to address the comments and to reference applicable Version 0 standards.

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

1. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Certification standard?**

Yes

No

Comments:

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

2. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Agreements standard?**

Yes

No

Comments:

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

3. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Personnel standard?**

Yes

No

Comments:

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

4. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Data Acquisition and Monitoring standard?**

X Yes

No

Comments:

**Standard – ORG-005-1 – Transmission Operator Certification – System Analysis**

5. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – System Analysis standard?**

X Yes

No

Comments:

**Standard – ORG-006-1 – Transmission Operator Certification – Emergency Operations**

6. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Emergency Operations standard?**

X Yes

No

Comments:

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

7. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Loss of Control Center Functionality standard?**

X Yes

No

Comments:

**Standard – ORG-008-1 – Transmission Operator Certification – Restoration**

8. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Restoration standard?**

X Yes

No

Comments:

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

Comments:

10. **Please identify any regional differences that should be included in the certification standards? (Please identify the standard, the requirement, and specific difference that need to be included in the requirement.)**

Comments: CenterPoint Energy defers to ERCOT to comment on regional differences.

11. **The drafting team believes that the Transmission Operator Certification standards are ready for ballot. Do you support this position?**

X Yes

No

Comments:

## Comment Form

### Fourth Posting of the Draft Transmission Operator Certification Standards

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

<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	John Horakh, 02-13-2006	
Organization:	MAAC	
Telephone:	609-625-6014	
E-mail:	john.horakh@pepcoholdings.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	X	2 — RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> MAPP	<input type="checkbox"/>	
<input type="checkbox"/> NPCC	<input type="checkbox"/>	3 — Load-serving Entities
X <input type="checkbox"/> RFC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> SERC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SPP	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> WECC	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	8 — Small Electricity End Users
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Comment Form — Fourth Posting of the Draft Transmission Operator Certification Standards

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**Group Name:**

**Lead Contact:**

**Contact Organization:**

**Contact Segment:**

**Contact Telephone:**

**Contact E-mail:**

Additional Member Name	Additional Member Organization	Region*	Segment*

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<http://www.nerc.com/~filez/functionalmodel.html>
- In this posting, the drafting team has referenced applicable Version 0 standards. Specific Version 0 standard requirements have not been included to allow for future modifications. A reference document is being developed by the drafting team and Organization Certification Working Group to identify appropriate Version 0 requirements applicable to certification.
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**Standard – ORG-001-1 – Transmission Operator Certification – Certification**

1. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Certification standard?**

X  Yes

No

Comments:

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

2. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Agreements standard?**

X  Yes

No

Comments:

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

3. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Personnel standard?**

X  Yes

No

Comments:

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

4. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Data Acquisition and Monitoring standard?**

X  Yes

No

Comments:

**Standard – ORG-005-1 – Transmission Operator Certification – System Analysis**

5. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – System Analysis standard?**

X  Yes

No

Comments:

**Standard – ORG-006-1 – Transmission Operator Certification – Emergency Operations**

6. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Emergency Operations standard?**

X  Yes

No

Comments:

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

7. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Loss of Control Center Functionality standard?**

X  Yes

No

Comments:

**Standard – ORG-008-1 – Transmission Operator Certification – Restoration**

8. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Restoration standard?**

X  Yes

No

Comments:

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

Comments:

10. **Please identify any regional differences that should be included in the certification standards? (Please identify the standard, the requirement, and specific difference that need to be included in the requirement.)**

Comments:

11. **The drafting team believes that the Transmission Operator Certification standards are ready for ballot. Do you support this position?**

X  Yes

No

Comments: