

Comments - Transmission Operator Certification Standards, Draft 3

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

General Response: The Standard Drafting Team has modified the standards to now reference applicable Version 0 standards. The Drafting Team will seek affirmation of these modifications in the next posting. In addition, the team has modified the standards based on comments received.				
Commenter	Yes	No	Comment	Response
TOTAL:				
Entergy Services Ed Davis		X	There does not seem to be a requirement that in order to be certified the TOP must demonstrate how it adheres to all the NERC cyber security standards. Cyber Security references in this existing certification document are limited to Loss of Control Center and Emergencies.	The Standard has been modified to address your comment.
Operating Reliability Working Group Mike Anderson – AEP Bob Cochran – SPS Mike Gammon – KCP&L Don Hargrove – OG&E Allen Klassen – Westar Pete Kuebeck – OG&E Bill Nolte – SECI Robert Rhodes - SPP	X			
Southern Company – Transmission Raymond Vice Doug McLaughlin Mike Oatts Keith Calhoun Jim Viikinsalo Jim Griffith Jim Busbin Wade Pugh Phil Winston		X	ORG-001-1, R1 – Southern Company - Transmission previously commented that the certification standards should - ...reference the various standards (approved NERC Reliability Standards) that truly apply and not list each specific task that is required. Having a list may lead to the standards being changed at different times and the two getting out of synch with each other.- The Standard Drafting Team replied that -The Reliability Standards process is to avoid referencing standards within another standard to prevent discrepancies between the intended standard elements and future changes that may be made to the referenced standard.- We can not find the source of this directive and request that the drafting team provide the specific reference which forbids referencing the NERC Reliability St from within the Organizational Certification Standards. However, even if this is appropriate for NERC Reliability Standards in general, it does not appear to be appropriate for Organizational Certification Standards which appear to be fundamentally different from other NERC Reliability Standards. We request that the Standard Drafting Team, perhaps with the support of NERC Vice President of Standards, reconsider their position on this issue and make all efforts to avoid developing new reliability standards within the Organizational Certification Standards that potentially conflict with the NERC Reliability Standards. Note that the Standard Drafting Team violates its own direction	The Standard has been modified to include references to version 0 standards.

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		<p>concerning referencing other NERC standards from within a standard in ORG-001-1, R1 when it specifically references the other TOP Organizational Certification Standards (ORG-001-1, ORG-002-1, etc., although R1 doesn't list their numbers we have done so below in parentheses for your convenience). How can you reference these standards within ORG-001-1 when you can not reference other NERC Reliability Standards?</p> <p>Per your reply above, you can't and these references should be removed, thus eliminating ORG-001-1, R1 entirely. This is an obvious inconsistency. In addition, no such guidance was issued to the Revision 0 Standards Drafting Team and references to other standards were utilized in that process.</p> <p>The specific standards referenced in ORG-001-1, R1 are :</p> <ul style="list-style-type: none"> - Transmission Operator Certification — Certification (ORG-001-1) - Transmission Operator Certification — Agreements (ORG-002-1) - Transmission Operator Certification — Personnel (ORG-003-1) - Transmission Operator Certification — Data Acquisition and Monitoring (ORG-004-1) - Transmission Operator Certification — System Analysis (ORG-005-1) - Transmission Operator Certification — Emergency Operations (ORG-006-1) - Transmission Operator Certification — Loss of Control Center Functionality (ORG-007-1) - Transmission Operator Certification — Restoration (ORG-008-1) <p>ORG-001-1, R3 – Similar language is found in IRO-001-0, R1 for the Reliability Coordinator, but not in any of the TOP standards for the Transmission Operator. We probably need to be consistent for all entities and put it in one set of standards or the other (Organizational Certification Standards or Reliability Standards), but not both. Since this is something that can be done after initial certification, it should probably be in the Reliability Standards and referenced by the Organizational Certification Standards.</p> <p>ORG-001-1, R4 – This is a reference to the NERC Reliability Standards generically. If they can be referenced generically, why can they not be referenced specifically?</p> <p>ORG-001-1, R5 – Seems redundant. Why do you need a requirement saying that certification will be conditional on another (single) requirement?</p>	
<p>Southeastern Power Administration Carter B. Edge</p>	<p>X</p>	<p>As these standards have been refined, SEPA has had increasing concerns with the redundancy of Reliability</p>	<p>The Standard has been modified to include references to version 0 standards.</p>

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			<p>Standards Requirements in multiple standards. Duplication of Requirements and "one-time" certification Measures will lead to confusion, dilute recognition of Requirements, weaken the standards process and potentially introduce synchronization issues between the Requirements across the diferent standards in which they occur. The specific standards referenced in ORG-001-1, R1 are :</p> <ul style="list-style-type: none"> - Transmission Operator Certification — Certification (ORG-001-1) - Transmission Operator Certification — Agreements (ORG-002-1) - Transmission Operator Certification — Personnel (ORG-003-1) - Transmission Operator Certification — Data Acquisition and Monitoring (ORG-004-1) - Transmission Operator Certification — System Analysis (ORG-005-1) - Transmission Operator Certification — Emergency Operations (ORG-006-1) - Transmission Operator Certification — Loss of Control Center Functionality (ORG-007-1) - Transmission Operator Certification — Restoration (ORG-008-1) <p>ORG-001-1, R3 – Similar language is found in IRO-001-0, R1 for the Reliability Coordinator, but not in any of the TOP standards for the Transmission Operator. We probably need to be consistent for all entities and put it in one set of standards or the other (Organizational Certification Standards or Reliability Standards), but not both. Since this is something that can be done after initial certification, it should probably be in the Reliability Standards and referenced by the Organizational Certification Standards.</p> <p>ORG-001-1, R4 – This is a reference to the NERC Reliability Standards generically. If they can be referenced generically, why can they not be referenced specifically?</p> <p>ORG-001-1, R5 – Seems redundant. Why do you need a requirement saying that certification will be conditional on another (single) requirement?</p>	
<p>AESO Anita Lee</p>	<p>X</p>			
<p>FRCC Eric Senkowicz</p>		<p>X</p>	<p>As these standards have been refined, the FRCC has had increasing concerns with the redundancy of Reliability Standards Requirements in multiple standards. Duplication of Requirements and "one-time" certification Measures will lead to confusion, dilute recognition of Requirements, weaken the standards process and potentially introduce synchronization issues between the Requirements across the diferent standards in which they occur.</p>	<p>The Standard has been modified to include references to version 0 standards.</p> <p>The certification process was removed from the standard and supported by the industry. The CCC is currently responsible for the process.</p> <p>Although the Version 0 Matrix of Requirements by Function spreadsheet may be a useful resource, not all of the</p>

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			<p>In an effort to clarify the overall standards process, reduce documentation and focus the compliance process the FRCC suggests to replace these eight standards with a single certification standard which addresses the certification process only, as defined in the Standard Authorization Request (SAR) which initiated these standards. This single standard would only include the unique requirements of the certification process (as described in the SAR) and would address the specific Transmission Operator process requirements by global or specific reference. This would eliminate redundancy, eliminate the need for additional synchronization controls and maintain the integrity of the current TOP applicable Requirements. This would also help focus the compliance elements rather than weaken and dilute them.</p> <p>There is a Requirements database which currently exists, that sorts applicable requirements applicable to each entity. The end product of a single certification process only standard, would be that TOPs going through the certification process would come out of it with a focused and clearer understanding of the actual Reliability Standards and associated Requirements for which they will be required to comply with on a day-to-day basis.</p>	<p>requirements included in Version 0 standards will be included in the elements of certification.</p>
<p>San Diego Gas & Electric Scott N. Peterson</p>		<p>X</p>	<p>In California, the CAISO and member regulated utilities have both registered as TOPs for the same equipment. Most of the TOP functions are performed by the CAISO, but a number of tasks have either been retained by the member utilities or have been delegated from the CAISO to those utilities. How do the standards deal with this situation? The member utilities do not believe they are responsible for those tasks not delegated to them by the CAISO even though they have registered as a TOP.</p>	<p>The intent is that there will only be one TOP responsible for each specific transmission asset. The certification standard does address the issues related to delegation of task performance.</p>
<p>Hydro-Quebec TransEnergie Roger Champagne</p>		<p>X</p>	<p>R3 implies a single TOP for each Control Area. NERC guidance allows multiple TOPs to register with a single Control Area. The Version 0 Matrix of Requirements by Function identifies tasks are not necessarily under the purview of a single entity. We request clarification from the Drafting Team on which is appropriate. In many cases there is no delegation of responsibilities in performing certain task but rather agreements that detail which entity performs any given task. We would suggest a statement such as the following be added to the document: "Agreements between any entities performing Transmission Operating tasks referenced in R-1 of ORG-002-1 shall not be superceded by those in R-3 in ORG-001-1. The entities signing such agreements must take steps to ensure that all requirements stated in the standards are performed by at least</p>	<p>There may be multiple TOPs in what used to be a control area, but the intent is that there will only be one TOP responsible for each specific transmission asset. The certification standard does address the issues related to delegation of task performance, but this does not change the aspect of responsibility.</p> <p>The drafting team has made modifications to ORG-003 to address additional issues related to delegation of tasks.</p>

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			one entity, i.e. there are no gaps in responsibilities."	
IESO, Ontario Ron Falsetti	X		Requirement R3 references a "NERC Certification Process for transmission operators", However we are unaware of the existence of such a process. The IESO suggests that it accompany this standard as part of the TOP implementation plan.	The CCC is responsible for developing the certification process. The name of this document has recently been changed to the Organization Registration and Certification Manual. The document is expected to be available on the NERC website. The SDT has made this name change in the most recent standard modifications. The working draft of the document is available in the OCWG meeting minutes.
Allegheny Power William J. Smith	X			
California ISO Lisa A. Szot	X		Please define "NERC certification process transmission operators".	The CCC is responsible for developing the certification process. The name of this document has recently been changed to the Organization Registration and Certification Manual. The document is expected to be available on the NERC website. The SDT has made this name change in the most recent standard modifications. The working draft of the document is available in the OCWG meeting minutes.
ISO New England Kathleen Goodman		X	R3 implies a single TOP for each Control Area. NERC guidance has allowed multiple TOPs to register with a single Control Area. The Version 0 Matrix of Requirements by Function identifies tasks are not necessarily under the purview of a single entity. We request clarification from NERC or the Drafting Team on which is appropriate. In many cases there is no delegation of responsibilities in performing certain task but rather agreements that detail which entity performs any given task. ISO New England further suggests a statement such as the following be added to the document: "Agreements between any entities performing Transmission Operating tasks referenced in R-1 of ORG-002-1 shall not be superceded by those in R-3 in ORG-001-1. The entities signing such agreements must take steps to ensure that all requirements stated in the standards are performed by at least one entity, i.e. there are no gaps in responsibilities."	There may be multiple TOPs in what used to be a control area, but the intent is that there will only be one TOP responsible for each specific transmission asset. The certification standard does address the issues related to delegation of task performance, but this does not change the aspect of responsibility. The drafting team has made modifications to ORG-003 to address additional issues related to delegation of tasks.
Midwest Reliability Organization Robert Coish - MRO Terry Bilke – MISO Dennis Florom – Lincoln Electric System Wayne Guttormson – SPC Ken Goldsmith – ALT Todd Gosnell – OPPD Alan Boesch – NPPD Jim Maenner – WPS Darrick Moe – WAPA	X			

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Tom Mielnik – MEC Joe Knight – MRO 31 Additional Members				
Manatoba Hydro Robert Coish	X			
Tennessee Valley Authority Kathleen Davis Chris Donilon	X			
CenterPoint Energy John Jointe Dennis Caufield	X			
Hydro One Networks, Inc. David Kiguel		X	<p>R3 implies a single TOP for a Control Area. NERC guidance on entity registration allows multiple TOPs for a Control Area. The Version 0 Matrix of Requirements by Function identifies tasks are not necessarily under the purview of a single entity. In many cases there is no delegation of responsibilities to perform certain tasks but rather regulatory allocation of roles and/or agreements that detail which entity has the responsibility of performing any given task. An entity cannot delegate the responsibility for performing a task if that entity did not have such responsibility in the first place.</p> <p>Hydro One suggests a statement such as the following be added to the document:</p> <p>"Agreements between any entities performing Transmission Operating tasks referenced in R1 of ORG-002-1 and other local rules/codes shall not be superceded by those in R3 in ORG-001-1. The entities signing such agreements must take steps to ensure that all requirements stated in the standards are performed by at least one entity, i.e. there are no gaps in responsibilities."</p> <p>The problem originates in the definition of TOP in the Functional Model which defines TOP as an entity that operates OR directs the operation of the BES. Hydro One believes that the Functional Model must be modified to separate the direction function (usually performed by ISOs) from the actual operation (switching) usually performed by TOs.</p>	<p>There may be multiple TOPs in what used to be a control area, but the intent is that there will only be one TOP responsible for each specific transmission asset. The certification standard does address the issues related to delegation of task performance, but this does not change the aspect of responsibility.</p> <p>The drafting team has made modifications to ORG-003 to address additional issues related to delegation of tasks.</p>
MAAC John Horakh	X			
CP9, Reliability Standards Working Group Ralph Rufrano – NY Power Authority Peter Lebro- National Grid US Roger Champagne – TransEnergie David Kiguel – Hydro One Al Adamson – NY State Reliability Council Khaquan Khan – The IESO (Ont) Greg Campoli – NY ISO		X	<p>R3 implies a single TOP for a Control Area. NERC guidance allows multiple TOPs for a Control Area. The Version 0 Matrix of Requirements by Function identifies tasks are not necessarily under the purview of a single entity. NPCC participating Members request clarification. In many cases there is no delegation of responsibilities in performing certain task but rather agreements that detail which entity performs any given task.</p> <p>NPCC participating members would suggest a statement such as the following be added to the document;</p>	<p>There may be multiple TOPs in what used to be a control area, but the intent is that there will only be one TOP responsible for each specific transmission asset. The certification standard does address the issues related to delegation of task performance, but this does not change the aspect of responsibility.</p> <p>The drafting team has made modifications to ORG-003 to address additional issues related to delegation of tasks.</p>

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David Little – Nova Scotia Power Kathleen Goodman – ISO NE Guy Zito – Northeast Power Coord. Council			"Agreements between any entities performing Transmission Operating tasks referenced in R-1 of ORG-002-1 shall not be superseded by those in R-3 in ORG-001-1. The entities signing such agreements must take steps to ensure that all requirements stated in the standards are performed by at least one entity, i.e. there are no gaps in responsibilities."	
First Energy Corp. Ray Morella	X		R5 should be reworded as follows: The awarding of certification to the Transmission Operator by the NERC Regional Reliability Organizations shall be based on satisfying all of the requirements defined in the NERC Transmission Operator Certification Standards identified in Requirement R1.	Wording modified
Great River Energy Gordon Pietsch	X			
South Mississippi Electric Power Association Dan M Kay	X			
Southwest Transmission Cooperative, Inc. Alan Wilkinson	X			
National Rural Electric Cooperative Association Bary Lawson				
Alabama Electric Cooperative Tim Hattaway	X			
Alabama Electric Cooperative Kenneth Skroback	X			
Dairyland Power Cooperative Ben Porath				

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

General Response: The Standard Drafting Team has modified the standards to now reference applicable Version 0 standards. The Drafting Team will seek affirmation of these modifications in the next posting. In addition, the team has modified the standards based on comments received.				
Commenter	Yes	No	Comment	Response
TOTAL:				
Entergy Services Ed Davis	X			
Operating Reliability Working Group Mike Anderson – AEP Bob Cochran – SPS Mike Gammon – KCP&L Don Hargrove – OG&E Allen Klassen – Westar Pete Kuebeck – OG&E Bill Nolte – SECI Robert Rhodes - SPP		X	In our comments filed on the second draft of this proposed standard we mentioned concerns we had about the apparent conflict in R1.1.6.1 with the FERC Code of Conduct. In its reply to our comments, the SDT indicated that the requirement was not intended to cause the TOP to violate the Code of Conduct and that the standard has been modified per our suggestion. However, this draft of the standard contains the exact same language as the second draft. This issue still needs to be resolved. We would again suggest including language which would add "such as allowed under the FERC Code of Conduct" to the requirement.	The standard has been modified based on your comment.
Southern Company – Transmission Raymond Vice Doug McLaughlin Mike Oatts Keith Calhoun Jim Viikinsalo Jim Griffith Jim Busbin Wade Pugh Phil Winston		X	ORG-002-1, R1 – The agreements listed in this requirement are neither complete nor definitive nor can they be. We highly suggest that they be modified to reference agreements required to meet the functional requirements of the appropriate NERC Reliability Standards. In addition, some, if not most, of the entities referred to by this requirement are not well defined in the existing Functional Model. Nor has there been any effort to register these entities in the regions. It would seem more useful to require agreements with functional requirements with the proper entities rather than depend upon Functional Model entities that have not been defined or that do not yet exist.	The standards have been modified to include references to Version 0 standards. These certification standards are only referencing functions that are already identified in Version 0 standards. Although the identification of the entities performing these functions is necessary, entity registration is beyond the scope of the drafting team.
Southeastern Power Administration Carter B. Edge		X	ORG-002-1, R1 – The agreements listed in this requirement are neither complete nor definitive nor can they be. We highly suggest that they be modified to reference agreements required to meet the functional requirements of the appropriate NERC Reliability Standards. In addition, some, if not most, of the entities referred to by this requirement are not well defined in the existing Functional Model. Nor has there been any effort to register these entities in the regions. It would seem more useful to require agreements with functional requirements with the proper entities rather than depend upon Functional Model entities that have not been defined or that do not yet exist.	The standards have been modified to include references to Version 0 standards. These certification standards are only referencing functions that are already identified in Version 0 standards. Although the identification of the entities performing these functions is necessary, entity registration is beyond the scope of the drafting team.
AESO Anita Lee		X	For each element in Requirements 1.1 to 1.7, we suggest to replace the word “commitment with “obligation.” Obligation is a stronger word.	The SDT feels that the two terms are synonymous and does not see a need to change the wording.
FRCC Eric Senkowicz		X	See comment to number 1	Please refer to the response provided.

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San Diego Gas & Electric Scott N. Peterson				
Hydro-Quebec TransEnergie Roger Champagne	X			
IESO, Ontario Ron Falsetti		X	For each element in Requirements 1.1 to 1.7, we suggest replacing the word "commitment" with "obligation". It is the IESO's view the term "obligation" is a more compelling word.	The SDT feels that the two terms are synonymous and does not see a need to change the wording.
Allegheny Power William J. Smith	X			
California ISO Lisa A. Szot	X			
ISO New England Kathleen Goodman	X			
Midwest Reliability Organization Robert Coish - MRO Terry Bilke – MISO Dennis Florom – Lincoln Electric System Wayne Guttormson – SPC Ken Goldsmith – ALT Todd Gosnell – OPPD Alan Boesch – NPPD Jim Maenner – WPS Darrick Moe – WAPA Tom Mielnik – MEC Joe Knight – MRO 31 Additional Members	X			
Manatoba Hydro Robert Coish	X			
Tennessee Valley Authority Kathleen Davis Chris Donilon	X			
CenterPoint Energy John Jointe Dennis Caufield	X		If one entity has multiple reliability roles(i.e. an RC is also the BA and /or TO) it's internal documentation must clearly define it's own authority & responsibilities in conjunction with the agreements with other entities. Each entities responsibilities (including delegated responsibilities) must be clearly defined, especially concerning emergency operations, curtailments and load shedding.	
Hydro One Networks, Inc. David Kiguel		X	R1 should be modified to include agreements among TOPs in the same Area.	Adjacent TOPs are addressed in requirement 1.7
MAAC John Horakh	X			
CP9, Reliability Standards Working Group Ralph Rufrano – NY Power Authority Peter Lebro- National Grid US Roger Champagne – TransEnergie	X			

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David Kiguel – Hydro One Al Adamson – NY State Reliability Council Khaquan Khan – The IESO (Ont) Greg Campoli – NY ISO David Little – Nova Scotia Power Kathleen Goodman – ISO NE Guy Zito – Northeast Power Coord. Council				
First Energy Corp. Ray Morella	X		R1.1.10. Should be changed from "as requested" to "as directed" by the Balancing Authority or Reliability Coordinator.	The standard has been modified to address your comment.
Great River Energy Gordon Pietsch	X			
South Mississippi Electric Power Association Dan M Kay	X		SMEPA supports the removal of the requirement that a TOP must execute the NERC ORD Confidentiality Agreement in order to be certified as a TOP.	
Southwest Transmission Cooperative, Inc. Alan Wilkinson	X			
National Rural Electric Cooperative Association Bary Lawson	X		NRECA supports the removal of the requirement that a TOP must execute the NERC ORD Confidentiality Agreement in order to be certified as a TOP. NRECA agrees that this only needs to be signed if an entity requires access to the ISN data from NERC as referred to in the ORD agreement.	
Alabama Electric Cooperative Tim Hattaway	X			
Alabama Electric Cooperative Kenneth Skroback	X			
Dairyland Power Cooperative Ben Porath	X		Dairyland supports the removal of the requirement that a TOP must execute the NERC ORD Confidentiality Agreement in order to be certified as a TOP. Dairyland agrees that this need only be signed if the TOP requires access to ISN data.	

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

General Response: The Standard Drafting Team has modified the standards to now reference applicable Version 0 standards. The Drafting Team will seek affirmation of these modifications in the next posting. In addition, the team has modified the standards based on comments received.

Commenter	Yes	No	Comment	Response
TOTAL:				
Entergy Services Ed Davis	X			
Operating Reliability Working Group Mike Anderson – AEP Bob Cochran – SPS Mike Gammon – KCP&L Don Hargrove – OG&E Allen Klassen – Westar Pete Kuebeck – OG&E Bill Nolte – SECI Robert Rhodes - SPP		X	The third bullet under R1.1 contains a similar requirement as that mentioned in ORG-002-1, R1.1.6.1 and commented on in Question 2 above.	The standard has been modified based on your comment.
Southern Company – Transmission Raymond Vice Doug McLaughlin Mike Oatts Keith Calhoun Jim Viikinsalo Jim Griffith Jim Busbin Wade Pugh Phil Winston		X	ORG-003-1, R1.1 – This requirements goes into specific detail well beyond that of the currently approved NERC Reliability Standard PER-003-0, which requires certified personnel in R1.1 for -Positions that have the primary responsibility, either directly or through communications with others, for the real-time operation of the interconnected Bulk Electric System- and in R1.2. - Positions directly responsible for complying with NERC standards-. In our opinion, it is inappropriate to -make up- new personnel certification requirement details in Organizational Certification Standards that are not supported in the appropriate NERC Reliability Standard. ORG-003-1, R2 – This requirement does not appear to support the specific training requirements of NERC Reliability Standard PER-002-0 and is therefore inadequate as the sole training requirement for organizational certification.	The intent of the requirement was to clarify which personnel in an organization had to be certified based on the tasks that they performed. The standard has been modified to reference the Version 0 standard.
Southeastern Power Administration Carter B. Edge		X	ORG-003-1, R1.1 – This requirements goes into specific detail well beyond that of the currently approved NERC Reliability Standard PER-003-0, which requires certified personnel in R1.1 for -Positions that have the primary responsibility, either directly or through communications withothers, for the real-time operation of the interconnected Bulk Electric System- and in R1.2. - Positions directly responsible for complying with NERC standards-. In our opinion, it is inappropriate to -make up- new personnel certification requirement details in Organizational Certification Standards that are not supported in the appropriate NERC Reliability Standard. ORG-003-1, R2 – This requirement does not appear to support the specific training requirements of NERC Reliability Standard PER-002-0 and is therefore inadequate as the sole training requirement for organizational certification.	The intent of the requirement was to clarify which personnel in an organization had to be certified based on the tasks that they performed. The standard has been modified to reference the Version 0 standard.

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AESO Anita Lee	X			
FRCC Eric Senkowicz		X	See comment to number 1	Please refer to the response to #1.
San Diego Gas & Electric Scott N. Peterson				
Hydro-Quebec TransEnergie Roger Champagne		X	We recommend that the word "operate" be removed from the first bullet in R1.1 to demonstrate that field personnel who may physically operate equipment do not necessarily require this certification. R2.1 (training program) is extremely general and completely subjective. This Requirement needs more specificity.	The standard has been modified to remove any implication that field personnel would be included. The referencing of the Version 0 standard is intended to provide more details.
IESO, Ontario Ron Falsetti	X	X	R2.1 (training program) is too general and subjective. This Requirement requires more specificity.	The referencing of the Version 0 standard is intended to provide more details.
Allegheny Power William J. Smith	X			
California ISO Lisa A. Szot		X	This Requirement needs more specificity. Does the term "operate" mean that personnel that physically operate this system need to be certified?	The standard has been modified to remove any implication that field personnel would be included.
ISO New England Kathleen Goodman		X	ISO New England recommends the word "operate" be removed from the first bullet in R1.1 to demonstrate that field personnel who may physically operate equipment do not necessarily require this certification. R2.1 (training program) is extremely general and completely subjective. This Requirement needs more specificity.	The standard has been modified to remove any implication that field personnel would be included. The referencing of the Version 0 standard is intended to provide more details.
Midwest Reliability Organization Robert Coish - MRO Terry Bilke – MISO Dennis Florum – Lincoln Electric System Wayne Guttormson – SPC Ken Goldsmith – ALT Todd Gosnell – OPPD Alan Boesch – NPPD Jim Maenner – WPS Darrick Moe – WAPA Tom Mielnik – MEC Joe Knight – MRO 31 Additional Members	X		However, R2.1, "The Transmission Operator shall have a training program that addresses the knowledge and competencies required for reliable system operations." is vague and may be hard to measure	The referencing of the Version 0 standard is intended to provide more details.
Manatoba Hydro Robert Coish	X		However, R2.1, "The Transmission Operator shall have a training program that addresses the knowledge and competencies required for reliable system operations." is vague and may be hard to measure	The referencing of the Version 0 standard is intended to provide more details.
Tennessee Valley Authority Kathleen Davis	X			

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Chris Donilon				
CenterPoint Energy John Jointe Dennis Caufield	X			
Hydro One Networks, Inc. David Kiguel		X	We recommend that "operate" be removed from the first bullet in R1.1 to demonstrate that field personnel who may physically operate equipment do not require this certification. R2.1 (training program) is extremely general and completely subjective. This Requirement needs more specificity.	The standard has been modified to remove any implication that field personnel would be included. The referencing of the Version 0 standard is intended to provide more details.
MAAC John Horakh	X			
CP9, Reliability Standards Working Group Ralph Rufrano – NY Power Authority Peter Lebro- National Grid US Roger Champagne – TransEnergie David Kiguel – Hydro One Al Adamson – NY State Reliability Council Khaquan Khan – The IESO (Ont) Greg Campoli – NY ISO David Little – Nova Scotia Power Kathleen Goodman – ISO NE Guy Zito – Northeast Power Coord. Council		X	NPCC participating Members recommend that "operate" be removed from the first bullet in R1.1 to demonstrate that field personnel who may physically operate equipment do not require this certification. R2.1 (training program) is extremely general and completely subjective. This Requirement needs more specificity.	The standard has been modified to remove any implication that field personnel would be included. The referencing of the Version 0 standard is intended to provide more details.
First Energy Corp. Ray Morella		X	R1.1 of the standard states the tasks of a Transmission Operator as "Monitor, operate or direct the operations of the transmission system within equipment and facility ratings." Monitor, operate or direct the operations wording causes industry confusion. Are these the personnel that perform SCADA switching and direct the field personnel to perform the actual switching operation on a real-time basis or are these the personnel at the Reliability Coordination position that authorize outages? This needs to be resolved prior to implementing these standards and this standard should clearly specify who is the transmission operator. "Deploy reactive resources to maintain acceptable voltage profiles." Webster defines the word deploy as "to spread out (as troops or ships) in order for battle" This should read Utilize reactive resources to maintain acceptable voltage profiles through "direction of field personnel or SCADA Switching" for personnel that perform SCADA switching or direct the actual switching of field personnel or "direction of Local Control Centers" for Reliability Coordinator personnel. "Request Reliability Coordinator to mitigate equipment overloads." implies that the Transmission Operator is not the Reliability Coordinator. R 1.1 should be changed as follows: "Coordinate voltage	The standard has been modified to remove any implication that field personnel would be included. Deploy has been deemed to be an acceptable term that is recognized. The standard has been modified to address R 1.1 The referencing of the Version 0 standard is intended to provide more details.

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			reduction and Coordinate load shedding with, or as directed by, the Reliability Coordinator or Balancing Authority. This is needed to be consistent with R1.1.10 in ORG-002-1. R2 should state The Transmission Operator shall have a training program that meets the requirements of PER-002 of the NERC Standards. "This standard should not have a separate training requirement or compliance measures that may be different than the Training standard contained in the NERC Manual.	
Great River Energy Gordon Pietsch	X			
South Mississippi Electric Power Association Dan M Kay	X			
Southwest Transmission Cooperative, Inc. Alan Wilkinson	X			
National Rural Electric Cooperative Association Bary Lawson				
Alabama Electric Cooperative Tim Hattaway	X			
Alabama Electric Cooperative Kenneth Skroback	X			
Dairyland Power Cooperative Ben Porath				

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

General Response: The Standard Drafting Team has modified the standards to now reference applicable Version 0 standards. The Drafting Team will seek affirmation of these modifications in the next posting. In addition, the team has modified the standards based on comments received.				
Commenter	Yes	No	Comment	Response
TOTAL:				
Entergy Services Ed Davis	X			
Operating Reliability Working Group Mike Anderson – AEP Bob Cochran – SPS Mike Gammon – KCP&L Don Hargrove – OG&E Allen Klassen – Westar Pete Kuebeck – OG&E Bill Nolte – SECI Robert Rhodes - SPP	X			
Southern Company – Transmission Raymond Vice Doug McLaughlin Mike Oatts Keith Calhoun Jim Viikinsalo Jim Griffith Jim Busbin Wade Pugh Phil Winston		X	ORG-004-1, R1, R2 and R4 – The specific details within these requirements are neither complete nor definitive nor can they be. We highly suggest that they be modified to reference the functional requirements of the appropriate NERC Reliability Standards for data acquisition periodicity and accuracy (see, for example BAL-005-0, 8, R16 and R17).	R1 – There is no specific reference to point to in Version 0. The SDT believes that the requirement needs to remain in the standard with the specifics defined by the TOP to ensure reliable operations. R2 and R4 – The requirements have been modified to reference the Version 0 standards when applicable.
Southeastern Power Administration Carter B. Edge		X	Comments: ORG-004-1, R1, R2 and R4 – The specific details within these requirements are neither complete nor definitive nor can they be. We highly suggest that they be modified to reference the functional requirements of the appropriate NERC Reliability Standards for data acquisition periodicity and accuracy (see, for example BAL-005-0, R8, R16 and R17).	R1 – There is no specific reference to point to in Version 0. The SDT believes that the requirement needs to remain in the standard with the specifics defined by the TOP to ensure reliable operations. R2 and R4 – The requirements have been modified to reference the Version 0 standards when applicable.
AESO Anita Lee	X		(i)- Requirement 1 - "periodicity of transmittal" and "time frame" appear to mean the same thing. (ii)- In order to be consistent with the content and intent of this certification standard, the wording in the Purpose section need to be modified to include more than real-time data (e.g. generator maintenance plan, transmission maintenance plan, etc). (iii)- The sub-requirements of R2 should include "synchronizing facilities"	i – periodicity refers to frequency of data while time frame refers to duration ii – the standard has been modified iii – this information is included in generation and transmission facility data
FRCC Eric Senkowicz		X	See comment to number 1	Please refer to response to number 1

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San Diego Gas & Electric Scott N. Peterson				
Hydro-Quebec TransEnergie Roger Champagne	X			
IESO, Ontario Ron Falsetti	X		(i)- Requirement 1 - "periodicity of transmittal" and "time frame" appear to mean the same thing. (ii)- In order to be consistent with the content and intent of this certification standard, the wording in the Purpose section need to be modified to include more than real-time data (e.g. generator maintenance plan, transmission maintenance plan, etc). (iii)- The sub-requirements of R2 should include "synchronizing facilities"	i – periodicity refers to frequency of data while time frame refers to duration ii – the standard has been modified iii – this information is included in generation and transmission facility data
Allegheny Power William J. Smith	X			
California ISO Lisa A. Szot	X			
ISO New England Kathleen Goodman	X			
Midwest Reliability Organization Robert Coish - MRO Terry Bilke – MISO Dennis Florom – Lincoln Electric System Wayne Guttormson – SPC Ken Goldsmith – ALT Todd Gosnell – OPPD Alan Boesch – NPPD Jim Maenner – WPS Darrick Moe – WAPA Tom Mielnik – MEC Joe Knight – MRO 31 Additional Members	X			
Manatoba Hydro Robert Coish	X		However, R2.1, “The Transmission Operator shall have a training program that addresses the knowledge and competencies required for reliable system operations.” is vague and may be hard to measure	
Tennessee Valley Authority Kathleen Davis Chris Donilon	X			
CenterPoint Energy John Jointe Dennis Caufield	X			
Hydro One Networks, Inc. David Kiguel	X			
MAAC John Horakh	X			

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CP9, Reliability Standards Working Group Ralph Rufrano – NY Power Authority Peter Lebro- National Grid US Roger Champagne – TransEnergie David Kiguel – Hydro One Al Adamson – NY State Reliability Council Khaquan Khan – The IESO (Ont) Greg Campoli – NY ISO David Little – Nova Scotia Power Kathleen Goodman – ISO NE Guy Zito – Northeast Power Coord. Council	X			
First Energy Corp. Ray Morella	X			
Great River Energy Gordon Pietsch	X			
South Mississippi Electric Power Association Dan M Kay	X			
Southwest Transmission Cooperative, Inc. Alan Wilkinson	X			
National Rural Electric Cooperative Association Bary Lawson				
Alabama Electric Cooperative Tim Hattaway	X			
Alabama Electric Cooperative Kenneth Skroback	X			
Dairyland Power Cooperative Ben Porath				

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

General Response: The Standard Drafting Team has modified the standards to now reference applicable Version 0 standards. The Drafting Team will seek affirmation of these modifications in the next posting. In addition, the team has modified the standards based on comments received.

Commenter	Yes	No	Comment	Response
TOTAL:				
Entergy Services Ed Davis	X			
Operating Reliability Working Group Mike Anderson – AEP Bob Cochran – SPS Mike Gammon – KCP&L Don Hargrove – OG&E Allen Klassen – Westar Pete Kuebeck – OG&E Bill Nolte – SECI Robert Rhodes - SPP		X	Although the SDT made an effort to clarify that loss of only primary systems is the intent in R1, the footnotes are still not totally clear that this is the case. For example, Footnote 1 could be reworded to say "Loss of communications is meant to include only primary communications..."	The Certification standard has been modified to reference the clarity identified in the Version 0 standards
Southern Company – Transmission Raymond Vice Doug McLaughlin Mike Oatts Keith Calhoun Jim Viikinsalo Jim Griffith Jim Busbin Wade Pugh Phil Winston				
Southeastern Power Administration Carter B. Edge	X			
AESO Anita Lee	X		R1, Bullet 5: This is too general and allows much wiggle room. Suggest "Loss of control center building functions, e.g., HVAC, power, water, etc."	The Certification standard has been modified to reference the clarity identified in the Version 0 standards
FRCC Eric Senkowicz		X	See comment to number 1	Please refer to the response to number 1
San Diego Gas & Electric Scott N. Peterson				
Hydro-Quebec TransEnergie Roger Champagne		X	R1, Bullet 5: This is too general. We suggest changing to "Loss of control center building functions, i.e. HVAC, power, water, etc."	The Certification standard has been modified to reference the clarity identified in the Version 0 standards
IESO, Ontario Ron Falsetti	X		Requirement R1 - outlines that TOP shall have procedures, processes, tools or facilities to continue to operate its RC Area under "single occurrence" for each of conditions listed. This needs to be clarified and revised to state that RC's shall continue to operate for any combination of conditions rather than single occurrence alone. In addition R1, Bullet 5 is too general and should be specific	The Certification standard has been modified to reference the clarity identified in the Version 0 standards

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			with respect to building support functions.. Suggest "Loss of control center building functions, e.g., HVAC, power, water, etc."	
Allegheny Power William J. Smith	X			
California ISO Lisa A. Szot	X	X	This is too general, needs more specificity.	The Certification standard has been modified to reference the clarity identified in the Version 0 standards
ISO New England Kathleen Goodman		X	R1, Bullet 5: This is too general; suggest changing to "Loss of control center building functions, e.g., HVAC, power, water, etc." Footnote 2 should be "entities" not entities'.	The Certification standard has been modified to reference the clarity identified in the Version 0 standards
Midwest Reliability Organization Robert Coish - MRO Terry Bilke – MISO Dennis Florom – Lincoln Electric System Wayne Guttormson – SPC Ken Goldsmith – ALT Todd Gosnell – OPPD Alan Boesch – NPPD Jim Maenner – WPS Darrick Moe – WAPA Tom Mielnik – MEC Joe Knight – MRO 31 Additional Members		X	(1) The MRO does recognize that certification standards must be complementary to reliability standards and that certification is measuring preparedness while the other standards, in general, are measuring performance. However, it seems the SDT is not recognizing the MRO concern that, as a fundamental principle, requirements for certification should not exceed requirements after certification. This standard should not formulate requirements that go beyond the requirements found in EOP-008. It would not be sensible to require companies to allocate more resources to meeting Loss of Control Center Functionality requirements prior to certification than they are required to allocate during ongoing operations, as covered in EOP-008. The requirements to be prepared to perform a function should not exceed the requirements for performing the function. Regarding R2.3, R2.6 and R2.10 in ORG-007-1, does having procedures in place that relies on sending people to the field to monitor information, and then calling that information back to a control center, meet these requirements? What is meant by "in real-time"? (2) In R2 change "and tools" to "or tools".	The SDT hopes that your concerns are addressed by the Certification standard being modified to reference the Version 0 standards
Manatoba Hydro Robert Coish		X	(1) The MH does recognize that certification standards must be complementary to reliability standards and that certification is measuring preparedness while the other standards, in general, are measuring performance. However, it seems the SDT is not recognizing the concern that, as a fundamental principle, requirements for certification should not exceed requirements after certification. This standard should not formulate requirements that go beyond the requirements found in EOP-008. It would not be sensible to require companies to allocate more resources to meeting Loss of Control Center Functionality requirements prior to certification than they are required to allocate during ongoing operations, as covered in EOP-008. The requirements to be prepared to perform a function should not exceed the requirements for performing the function. Regarding R2.3, R2.6 and R2.10 in ORG-007-1, does having procedures in place that relies on sending people	The SDT hopes that your concerns are addressed by the Certification standard being modified to reference the Version 0 standards

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			to the field to monitor information, and then calling that information back to a control center, meet these requirements? What is meant by "in real-time"? (2) In R2 change "and tools" to "or tools".	
Tennessee Valley Authority Kathleen Davis Chris Donilon	X			
CenterPoint Energy John Jointe Dennis Caufield	X			
Hydro One Networks, Inc. David Kiguel		X	R1, Bullet 5: This is too general and allows much wiggle room. Suggest "Loss of control center building functions, e.g., HVAC, power, water, etc." Footnote 2 should be "entities" not entities'.	The Certification standard has been modified to reference the clarity identified in the Version 0 standards The footnote has been removed
MAAC John Horakh	X			
CP9, Reliability Standards Working Group Ralph Rufrano – NY Power Authority Peter Lebro- National Grid US Roger Champagne – TransEnergie David Kiguel – Hydro One Al Adamson – NY State Reliability Council Khaquan Khan – The IESO (Ont) Greg Campoli – NY ISO David Little – Nova Scotia Power Kathleen Goodman – ISO NE Guy Zito – Northeast Power Coord. Council		X	R1, Bullet 5: This is too general and allows much wiggle room. Suggest "Loss of control center building functions, e.g., HVAC, power, water, etc." Footnote 2 should be "entities" not entities'	The Certification standard has been modified to reference the clarity identified in the Version 0 standards The footnote has been removed
First Energy Corp. Ray Morella	X			
Great River Energy Gordon Pietsch				
South Mississippi Electric Power Association Dan M Kay	X			
Southwest Transmission Cooperative, Inc. Alan Wilkinson	X			
National Rural Electric Cooperative Association Bary Lawson				
Alabama Electric Cooperative Tim Hattaway	X			
Alabama Electric Cooperative Kenneth Skroback				

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Dairyland Power Cooperative Ben Porath				
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6. During the 2nd posting of the TOP Certification Standards, industry consensus was obtained for the Introduction, Requirements, Measures, and Compliance elements of:
ORG-005 - Transmission Operator Certification — System Analysis
ORG-006 - Transmission Operator Certification — Emergency Operations
ORG-008 - Transmission Operator Certification — Restoration.
 The Drafting Team is not asking any specific questions related to these standards, but is providing an opportunity for comments related to them.

General Response: The Standard Drafting Team has modified the standards to now reference applicable Version 0 standards. The Drafting Team will seek affirmation of these modifications in the next posting. In addition, the team has modified the standards based on comments received.		
Commenter	Comment	Response
Entergy Services Ed Davis	Please modify these Certification Standards to reference specific existing Standards requirements and delete all restatements or rewording of those Standards requirements in these Certification Standards. These Certification Standards should require the TOP to prove how it meets the requirements of the existing Standards. It should not be imposing new requirements on the TOP, or providing the opportunity for new requirements to be imposed on the TOP.	The SDT has modified the standards to reference Version 0 standards
Operating Reliability Working Group Mike Anderson – AEP Bob Cochran – SPS Mike Gammon – KCP&L Don Hargrove – OG&E Allen Klassen – Westar Pete Kuebeck – OG&E Bill Nolte – SECI Robert Rhodes - SPP	Bulk Electric System (BES) is used in ORG-006 and ORG-008 but is not capitalized even though it is a defined term in the Standards Glossary.	This has been corrected in both standards, thank you.
Southern Company – Transmission Raymond Vice Doug McLaughlin Mike Oatts Keith Calhoun Jim Viikinsalo Jim Griffith Jim Busbin Wade Pugh Phil Winston	ORG-005-1, R1 thru R5 – The specific details within these requirements are neither complete nor definitive nor can they be. We highly suggest that they be modified to reference the functional requirements of the appropriate NERC Reliability Standards for transmission operations (TOP-001-0 thru TOP-008-0) and Reliability Coordinator interaction (IRO-001-0 thru IRO-006-0) ORG-006-1, R1– The specific details within these requirements are neither complete nor definitive nor can they be. I highly suggest that they be modified to reference the functional requirements of the appropriate NERC Reliability Standards for Emergency Operations (EOP-001-0 thru EOP-008-0).	The standards have been modified to reference the Version 0 standards when applicable.
Southeastern Power Administration Carter B. Edge	ORG-005-1, R1 thru R5 – The specific details within these requirements are neither complete nor definitive nor can they be. We highly suggest that they be modified to reference the functional requirements of the appropriate NERC Reliability Standards for transmission operations (TOP-001-0 thru TOP-008-0) and Reliability Coordinator interaction (IRO-001-0 thru IRO-006-0) ORG-006-1, R1– The specific details within these requirements are neither complete nor definitive nor can they be. I highly suggest that they be modified to reference the functional requirements of the appropriate NERC Reliability Standards for Emergency Operations (EOP-001-0 thru EOP-008-0)	The standards have been modified to reference the Version 0 standards when applicable.

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<p>AESO Anita Lee</p>	<p>a). With regards to Emergency Operations, please see the comments below: (i)- The entity seeking certification must have the capability to continue operations during emergency conditions. The entity must have communication protocols in place to allow other transmission entities to communicate vital information via more than one communication media. This needs to be clearly reflected/updated in the standard. (ii)- re: R1: It needs to be indicated that TOP's processes and directing the actions are applicable to Generator Operators(s), Transmission Owner(s), Load Serving entities and Distribution Provider(s). It should be consistent with ORG-002 (TOP Certification- Agreements). (iii)- ORG-006, change A3 from Transmission Operators to Transmission Operator b). With regards to "Restoration" Standard, please see the comments below: (i) There may be a need to included a minimum list of items that need to be included in the TOP restoration plan</p>	<p>The SDT has determined that the requirments contained in the Version 0 standards will provide the necessary level of communication.</p> <p>The standard has been modified to reference applicable Version 0 standards and should include the level of detail that your comments address.</p> <p>The typo has been corrected, thank you.</p> <p>EOP-005 which is refernced in the Restoration standard will provide the detail that you request.</p>
<p>FRCC Eric Senkowicz</p>	<p>See comment to number 1.</p>	<p>Please see our response to number 1</p>
<p>San Diego Gas & Electric Scott N. Peterson</p>	<p>Under System Analysis, member utilities under CAISO control area have also registered as TOP along with the CAISO. In these cases, these member report system analysis directly to CAISO rather than RC.</p>	<p>All TOPs are required to report this information to the RC.</p>
<p>Hydro-Quebec TransEnergie Roger Champagne</p>	<p>ORG-006, change A3 from Transmission Operators to Transmission Operator</p>	<p>The typo has been corrected, thank you.</p>
<p>IESO, Ontario Ron Falsetti</p>	<p>a). With regards to Emergency Operations, please see the comments below: (i)- The entity seeking certification must have the capability to continue operations during emergency conditions. The entity must have communication protocols in place to allow other transmission entities to communicate vital information via more than one communication media. This needs to be clearly reflected/updated in the standard. (ii)- re: R1: It needs to be indicated that TOP's processes and directing the actions are applicable to Generator Operators(s), Transmission Owner(s), Load Serving entities and Distribution Provider(s). It should be consistent with ORG-002 (TOP Certification- Agreements). (iii)- ORG-006, change A3 from Transmission Operators to Transmission Operator</p> <p>b). With regards to the "Restoration" Standard, there may be a need to included a minimum list of items that need to be included in the TOP restoration plan.</p>	<p>The SDT has determined that the requirments contained in the Version 0 standards will provide the necessary level of communication.</p> <p>The standard has been modified to reference applicable Version 0 standards and should include the level of detail that your comments address.</p> <p>The typo has been corrected, thank you.</p> <p>EOP-005 which is refernced in the Restoration standard will provide the detail that you request.</p>

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Allegheny Power William J. Smith	No comments	
California ISO Lisa A. Szot	In ORG-006, change A3 from Transmission Operators to Transmission Operator	The typo has been corrected, thank you.
ISO New England Kathleen Goodman	ORG-006, change A3 from Transmission Operators to Transmission Operator	The typo has been corrected, thank you.
Midwest Reliability Organization Robert Coish - MRO Terry Bilke – MISO Dennis Florom – Lincoln Electric System Wayne Guttormson – SPC Ken Goldsmith – ALT Todd Gosnell – OPPD Alan Boesch – NPPD Jim Maenner – WPS Darrick Moe – WAPA Tom Mielnik – MEC Joe Knight – MRO 31 Additional Members	(1) The MRO does not agree with ORG-005-1. In R1 to R5 of ORG-005-1 the words "shall perform" or "shall", as applicable, should be replaced by "shall have procedures, processes, and/or tools to be able to " (as appropriate). (2) In ORG-008-1, M1 delete "and R2" because R2 doesn't require that the Transmission Operator have a document. M1 should otherwise be modified to be a measure of the TO having provided its restoration plan to its Reliability Coordinator. Also, regarding the SDT response to MRO's comments, the MRO would like to point out that the complementary Reliability Standard to ORG-008-1, EOP-005-0, is to a great extent a measure of the TO's preparedness (not all performance) regarding the capability to restore the system. This is another example where Reliability Standards are not only about performance.	The standard has been modified to address your concern,
Manatoba Hydro Robert Coish	(1) The MH does not agree with ORG-005-1. In R1 to R5 of ORG-005-1 the words "shall perform" or "shall", as applicable, should be replaced by "shall have procedures, processes, and/or tools to be able to " (as appropriate). (2) In ORG-008-1, M1 delete "and R2" because R2 doesn't require that the Transmission Operator have a document. M1 should otherwise be modified to be a measure of the TO having provided its restoration plan to its Reliability Coordinator.	The standard has been modified to address your concern,
Tennessee Valley Authority Kathleen Davis Chris Donilon	None	
CenterPoint Energy John Joite Dennis Caufield		
Hydro One Networks, Inc. David Kiguel	ORG-006, change A3 from Transmission Operators to Transmission Operator	The typo has been corrected, thank you.
MAAC John Horakh	None	
CP9, Reliability Standards Working Group Ralph Rufrano – NY Power Authority Peter Lebro- National Grid US Roger Champagne – TransEnergie David Kiguel – Hydro One	ORG-006, change A3 from Transmission Operators to Transmission Operator	The typo has been corrected, thank you.

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Al Adamson – NY State Reliability Council Khaquan Khan – The IESO (Ont) Greg Campoli – NY ISO David Little – Nova Scotia Power Kathleen Goodman – ISO NE Guy Zito – Northeast Power Coord. Council		
First Energy Corp. Ray Morella	None	
Great River Energy Gordon Pietsch		
South Mississippi Electric Power Association Dan M Kay		
Southwest Transmission Cooperative, Inc. Alan Wilkinson		
National Rural Electric Cooperative Association Bary Lawson		
Alabama Electric Cooperative Tim Hattaway		
Alabama Electric Cooperative Kenneth Skroback		
Dairyland Power Cooperative Ben Porath		

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

Commenter	Comment	Response
Entergy Services Ed Davis		
Operating Reliability Working Group Mike Anderson – AEP Bob Cochran – SPS Mike Gammon – KCP&L Don Hargrove – OG&E Allen Klassen – Westar Pete Kuebeck – OG&E Bill Nolte – SECI Robert Rhodes - SPP		
Southern Company – Transmission Raymond Vice Doug McLaughlin Mike Oatts Keith Calhoun Jim Viikinsalo Jim Griffith Jim Busbin Wade Pugh Phil Winston		
Southeastern Power Administration Carter B. Edge		
AESO Anita Lee	<p>Comments: i)- The AESO has a general concern with regard to the existing NERC Registration Process and the ultimate TOP Certification Process. The concern regards the consistency, or lack thereof, of TOP registrations already performed, and the various interpretations within the industry of what constitutes a TOP. The ISO/RTO Council believes that guidelines must be established that provide consistency in registration and ultimately certification. Our understanding is that these issues are under consideration at the Functional Model Working Group and we would ask that these guidelines be developed and included in the revised Functional Model or be included in the implementation plan for the TOP Certification Standard.</p> <p>(ii)- With regards to the definition of the Agreement, we recommend that following wording should be used for the proposed statement/definition of Agreement, i.e. "For purposes of applying the term 'Agreement' within this standard it shall mean: A contract or other document delineating an arrangement that expresses assent and or obligation by two or more parties to the same object. This arrangement determines a course of action to be followed by all parties involved in the situation. The key components of the agreement must identify the ability, intent, and authority of the parties. The requirement for an agreement can be satisfied in a</p>	<p>The registration process is under the direction of the CCC. Each Region will be responsible to ensure that all entities within its area are correctly classified.</p> <p>The definition was provided by NERC Legal and supported by the industry.</p> <p>The certification standards are intended to be a one-time process. On-going audits such as readiness or compliance have their own data retention requirements.</p>

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	<p>variety of ways, including but not limited to: contracts, designation of authority documents, market rules, policies, and procedures.</p> <p>(iii)- It is expected that audits will be conducted for these standards. In that case, we suggest that a retention period for any audit records and results be specified.</p>	
FRCC Eric Senkowicz		
San Diego Gas & Electric Scott N. Peterson		
Hydro-Quebec TransEnergie Roger Champagne	See Question 1 Response above.	Please refer to the response to number 1
IESO, Ontario Ron Falsetti	<p>(i)- The IESO has a general concern with regard to the existing NERC Registration Process and the ultimate TOP Certification Process. The concern regards the consistency, or lack thereof, of TOP registrations already performed, and the various interpretations within the industry of what constitutes a TOP. The IESO believes that guidelines must be established that provide consistency in registration and ultimately certification. Our understanding is that these issues continue to be under consideration at the Functional Model Working Group and we would ask that these guidelines be developed and included in the revised Functional Model or be included in the implementation plan for the TOP Certification Standard.</p> <p>(ii)- With regards to the definition of the Agreement, we recommend that following wording should be used for the proposed statement/definition of Agreement, i.e. "For purposes of applying the term 'Agreement' within this standard it shall mean: a contract or other document delineating an arrangement that expresses assent and or obligation by two or more parties to the same object. This arrangement determines a course of action to be followed by all parties involved in the situation. The key components of the agreement must identify the ability, intent, and authority of the parties. The requirement for an agreement can be satisfied in a variety of ways, including but not limited to: contracts, designation of authority documents, market rules, policies, and procedures.</p> <p>(iii)- It is expected that audits will be conducted for these standards. In that case, we suggest that a retention period for any audit records and results be specified.</p>	<p>The registration process is under the direction of the CCC. Each Region will be responsible to ensure that all entities within its area are correctly classified.</p> <p>The definition was provided by NERC Legal and supported by the industry.</p> <p>The certification standards are intended to be a one-time process. On-going audits such as readiness or compliance have their own data retention requirements.</p>
Allegheny Power William J. Smith	None	
California ISO Lisa A. Szot	<p>There is a concern regarding the consistency, or lack thereof, of TOP registrations already performed, and the various interpretations within the industry of what constitutes a TOP. There should be consistency in registration and ultimately certification. Our understanding is that these issues are under consideration at the Functional Model Working Group and we would ask that these guidelines be developed and included in the revised Functional</p>	<p>The registration process is under the direction of the CCC. Each Region will be responsible to ensure that all entities within its area are correctly classified.</p>

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	Model or be included in the implementation plan for the TOP Certification Standard.	
ISO New England Kathleen Goodman	See Question 1 Response above.	Please refer to the response to number 1
Midwest Reliability Organization Robert Coish - MRO Terry Bilke – MISO Dennis Florom – Lincoln Electric System Wayne Guttormson – SPC Ken Goldsmith – ALT Todd Gosnell – OPPD Alan Boesch – NPPD Jim Maenner – WPS Darrick Moe – WAPA Tom Mielnik – MEC Joe Knight – MRO 31 Additional Members	The MRO suggests that the SDT consider adding language to the certification standards that reflects the fundamental principle that the requirements for certification do not exceed requirements after certification (i.e. as specified in the rest of the NERC reliability standards).	In general, with the referencing of applicable Version 0 standards, the certification standards should not exceed existing requirements. There are, however, some additional requirements specific to certification that are not currently addressed in the Version 0 standards but that the industry has supported during the development process.
Manatoba Hydro Robert Coish	The MH suggests that the SDT consider adding language to the certification standards that reflects the fundamental principle that the requirements for certification do not exceed requirements after certification (i.e. as specified in the rest of the NERC reliability standards).	In general, with the referencing of applicable Version 0 standards, the certification standards should not exceed existing requirements. There are, however, some additional requirements specific to certification that are not currently addressed in the Version 0 standards but that the industry has supported during the development process.
Tennessee Valley Authority Kathleen Davis Chris Donilon	None	
CenterPoint Energy John Jointe Dennis Caufield		
Hydro One Networks, Inc. David Kiguel	See Comments on Questions 1 and 2 above.	Please refer to questions 1 and 2 responses
MAAC John Horakh	None	
CP9, Reliability Standards Working Group Ralph Rufrano – NY Power Authority Peter Lebro- National Grid US Roger Champagne – TransEnergie David Kiguel – Hydro One Al Adamson – NY State Reliability Council Khaquan Khan – The IESO (Ont) Greg Campoli – NY ISO David Little – Nova Scotia Power Kathleen Goodman – ISO NE Guy Zito – Northeast Power Coord.	See question 1 Response above	Please refer to question 1 response

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Council		
First Energy Corp. Ray Morella	None	
Great River Energy Gordon Pietsch		
South Mississippi Electric Power Association Dan M Kay		
Southwest Transmission Cooperative, Inc. Alan Wilkinson		
National Rural Electric Cooperative Association Bary Lawson		
Alabama Electric Cooperative Tim Hattaway		
Alabama Electric Cooperative Kenneth Skroback		
Dairyland Power Cooperative Ben Porath		

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

Commenter	Comment	Response
Entergy Services Ed Davis		
Operating Reliability Working Group Mike Anderson – AEP Bob Cochran – SPS Mike Gammon – KCP&L Don Hargrove – OG&E Allen Klassen – Westar Pete Kuebeck – OG&E Bill Nolte – SECI Robert Rhodes - SPP		
Southern Company – Transmission Raymond Vice Doug McLaughlin Mike Oatts Keith Calhoun Jim Viikinsalo Jim Griffith Jim Busbin Wade Pugh Phil Winston		
Southeastern Power Administration Carter B. Edge		
AESO Anita Lee		
FRCC Eric Senkowicz		
San Diego Gas & Electric Scott N. Peterson		
Hydro-Quebec TransEnergie Roger Champagne	See Question 1 Response above.	
IESO, Ontario Ron Falsetti		
Allegheny Power William J. Smith	None	
California ISO Lisa A. Szot		
ISO New England Kathleen Goodman	See Question 1 Response above.	
Midwest Reliability Organization Robert Coish - MRO Terry Bilke – MISO Dennis Florom – Lincoln Electric System	None	

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Wayne Guttormson – SPC Ken Goldsmith – ALT Todd Gosnell – OPPD Alan Boesch – NPPD Jim Maenner – WPS Darrick Moe – WAPA Tom Mielnik – MEC Joe Knight – MRO 31 Additional Members		
Manatoba Hydro Robert Coish	None	
Tennessee Valley Authority Kathleen Davis Chris Donilon	None	
CenterPoint Energy John Jointe Dennis Caufield	CenterPoint Energy defers to ERCOT to comment on regional differences	
Hydro One Networks, Inc. David Kiguel		
MAAC John Horakh	None	
CP9, Reliability Standards Working Group Ralph Rufrano – NY Power Authority Peter Lebro- National Grid US Roger Champagne – TransEnergie David Kiguel – Hydro One Al Adamson – NY State Reliability Council Khaquan Khan – The IESO (Ont) Greg Campoli – NY ISO David Little – Nova Scotia Power Kathleen Goodman – ISO NE Guy Zito – Northeast Power Coord. Council		
First Energy Corp. Ray Morella	None	
Great River Energy Gordon Pietsch		
South Mississippi Electric Power Association Dan M Kay		
Southwest Transmission Cooperative, Inc. Alan Wilkinson		
National Rural Electric Cooperative Association Bary Lawson		

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Alabama Electric Cooperative Tim Hattaway		
Alabama Electric Cooperative Kenneth Skroback		
Dairyland Power Cooperative Ben Porath		

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

Commenter	Yes	No	Comment	Response
TOTAL:				
Entergy Services Ed Davis	X			
Operating Reliability Working Group Mike Anderson – AEP Bob Cochran – SPS Mike Gammon – KCP&L Don Hargrove – OG&E Allen Klassen – Westar Pete Kuebeck – OG&E Bill Nolte – SECI Robert Rhodes - SPP	X			
Southern Company – Transmission Raymond Vice Doug McLaughlin Mike Oatts Keith Calhoun Jim Viikinsalo Jim Griffith Jim Busbin Wade Pugh Phil Winston				
Southeastern Power Administration Carter B. Edge	X			
AESO Anita Lee		X	The implementation and application of this standard in terms of coordination with other Functional Model related entities should need to allow for a transition period until the other FM related entities are either fully registered or certified. Moreover, these entities (such as GOP, DP, etc.) need to be clearly defined and registered/certified before the implementation of this certification standard.	These certification standards are only referencing functions that are already identified in Version 0 standards. Although the identification of the entities performing these functions is necessary, entity registration is beyond the scope of the drafting team.
FRCC Eric Senkowicz		X	See comment to number 1	Please refer to the response to number 1
San Diego Gas & Electric Scott N. Peterson		X	In all sub sections the proposed effective date of April 1, 2006 should be extend to October 1, 2006 to allow for Agreements, documentation, and training records to be completed.	The effective date has been modified to include the field test and additional standard postings.
Hydro-Quebec TransEnergie Roger Champagne	X			
IESO, Ontario Ron Falsetti			The implementation and application of this standard in terms of coordination with other Functional Model related entities should need to allow for a transition period until the other FM related entities are either fully registered or certified. Moreover, these entities (such as GOP, DP, etc.) need to be clearly defined and registered/certified before the implementation of this certification standard.	These certification standards are only referencing functions that are already identified in Version 0 standards. Although the identification of the entities performing these functions is necessary, entity registration is beyond the scope of the drafting team.

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Allegheny Power William J. Smith	X			
California ISO Lisa A. Szot		X	The implementation and application of this standard in terms of coordination with other Functional Model related entities should need to allow for a transition period until the other FM related entities are either fully registered or certified. Moreover, these entities (such as GOP, DP, etc..) need to be clearly defined and registered/certified before the implementation of this certification standard.	These certification standards are only referencing functions that are already identified in Version 0 standards. Although the identification of the entities performing these functions is necessary, entity registration is beyond the scope of the drafting team.
ISO New England Kathleen Goodman	X			
Midwest Reliability Organization Robert Coish - MRO Terry Bilke – MISO Dennis Florum – Lincoln Electric System Wayne Guttormson – SPC Ken Goldsmith – ALT Todd Gosnell – OPPD Alan Boesch – NPPD Jim Maenner – WPS Darrick Moe – WAPA Tom Mielnik – MEC Joe Knight – MRO 31 Additional Members	X		However, the MRO would like to see that the NERC process for certification includes a reasonable time line for required agreements, that do not already exist, to be put in place.	The NERC BOT will ultimately approve the applicable implementation date.
Manatoba Hydro Robert Coish	X		However, the MH would like to see that the NERC process for certification includes a reasonable time line for required agreements, that do not already exist, to be put in place.	The NERC BOT will ultimately approve the applicable implementation date.
Tennessee Valley Authority Kathleen Davis Chris Donilon	X			
CenterPoint Energy John Jointe Dennis Caufield	X			
Hydro One Networks, Inc. David Kiguel	X			
MAAC John Horakh		X	The process looks OK, but the first sentence in Item # 7 (Control Area Certification for New Control Areas) should be reworded as follows for clarity. (1) Delete *after 4/1/2005* (2) After *continue*, add *using the existing control area certification process* (3) Delete *approved* and replace with *implemented, April 1, 2006.*	The implementation plan will be revised.
CP9, Reliability Standards Working Group Ralph Rufrano – NY Power Authority	X			

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Peter Lebro- National Grid US Roger Champagne – TransEnergie David Kiguel – Hydro One Al Adamson – NY State Reliability Council Khaquan Khan – The IESO (Ont) Greg Campoli – NY ISO David Little – Nova Scotia Power Kathleen Goodman – ISO NE Guy Zito – Northeast Power Coord. Council				
First Energy Corp. Ray Morella	X			
Great River Energy Gordon Pietsch				
South Mississippi Electric Power Association Dan M Kay	X			
Southwest Transmission Cooperative, Inc. Alan Wilkinson	X			
National Rural Electric Cooperative Association Bary Lawson				
Alabama Electric Cooperative Tim Hattaway	X			
Alabama Electric Cooperative Kenneth Skroback	X			
Dairyland Power Cooperative Ben Porath				

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

General Response: The Standard Drafting Team has modified the standards to now reference applicable Version 0 standards. The Drafting Team will seek affirmation of these modifications in the next posting. In addition, the team has modified the standards based on comments received.

Commenter	Yes	No	Comment	Response
TOTAL:				
Entergy Services Ed Davis	X			
Operating Reliability Working Group Mike Anderson – AEP Bob Cochran – SPS Mike Gammon – KCP&L Don Hargrove – OG&E Allen Klassen – Westar Pete Kuebeck – OG&E Bill Nolte – SECI Robert Rhodes - SPP		X	We could support submitting the standard for ballot provided the issue in ORG-002-1, R1.1.6.1 (Question 2) and ORG-003-1, R1.1 (Question 3) and the additional clarification requested on ORG-007-1, R1 (Question 5) are adequately addressed.	The standards have been modified to address your concerns.
Southern Company – Transmission Raymond Vice Doug McLaughlin Mike Oatts Keith Calhoun Jim Viikinsalo Jim Griffith Jim Busbin Wade Pugh Phil Winston			It should be pointed out during the V-0 standard development process and in the subsequent Version 1 standards development process, and on many other drafting teams, the drafting teams were instructed not to place duplicated requirements in two different standards. The appropriate procedure was to include the requirement in one standard and reference it in the other standard to prevent mistakenly updating it in one standard but not in the other as changes are required. We understand that the Certification drafting team has received different guidance which does not allow -referencing- of other standards. We feel this is a mistake and will cause potential problems with the standards themselves, and possibly jeopardizing reliability. We request that the drafting team provide the specific reference or source of the directives which forbids referencing the NERC Reliability Standards from within the Organizational Certification Standards. We believe that directive to be incorrect. This -no reference- directive appears to be particularly inappropriate for Organizational Certification Standards, which appear to be fundamentally different from other NERC Reliability Standards.	The standards have been modified to address your concerns regarding the referencing other standards.
Southeastern Power Administration Carter B. Edge	X		It should be pointed out during the V-0 standard development process and in the subsequent Version 1 standards development process, and on many other drafting teams, the drafting teams were instructed not to place duplicated requirements in two different standards. The appropriate procedure was to include the requirement in one standard and reference it in the other standard to prevent mistakenly updating it in one standard but not in the other as changes are required. We understand that the Certification drafting team has received different guidance which does not allow -referencing-	The standards have been modified to address your concerns regarding the referencing other standards.

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			of other standards. We feel this is a mistake and will cause potential problems with the standards themselves, and possibly jeopardizing reliability. We request that the drafting team provide the specific reference or source of the directives which forbids referencing the NERC Reliability Standards from within the Organizational Certification Standards. We believe that directive to be incorrect. This -no reference- directive appears to be particularly inappropriate for Organizational Certification Standards, which appear to be fundamentally different from other NERC Reliability Standards.	
AESO Anita Lee		X	Once our above comments are incorporated then we would consider these ready for balloting.	The SDT has modified the Certification standards to reference applicable Version 0 standards. These modifications should address the concerns expressed by commentors concerning duplication, clarity, and level of detail.
FRCC Eric Senkowicz		X	See comment to number 1	See response to number 1
San Diego Gas & Electric Scott N. Peterson		X	See above comments	See above responses
Hydro-Quebec TransEnergie Roger Champagne		X	If the above comments are satisfied, then these standards are ready for ballot.	The SDT has modified the Certification standards to reference applicable Version 0 standards. These modifications should address the concerns expressed by commentors concerning duplication, clarity, and level of detail.
IESO, Ontario Ron Falsetti		X	Once our above comments are incorporated then we would consider these ready for balloting.	The SDT has modified the Certification standards to reference applicable Version 0 standards. These modifications should address the concerns expressed by commentors concerning duplication, clarity, and level of detail.
Allegheny Power William J. Smith	X			
California ISO Lisa A. Szot		X	Once the above comments are satisfied then these will be ready for balloting.	The SDT has modified the Certification standards to reference applicable Version 0 standards. These modifications should address the concerns expressed by commentors concerning duplication, clarity, and level of detail.
ISO New England Kathleen Goodman		X	If the above comments are satisfied, then these standards are ready for ballot.	The SDT has modified the Certification standards to reference applicable Version 0 standards. These modifications should address the concerns expressed by commentors concerning duplication, clarity, and level of detail.
Midwest Reliability Organization Robert Coish - MRO Terry Bilke – MISO Dennis Florum – Lincoln Electric		X	MRO would like to see the TOP Certification Standards modified or clarified accordong to our comments.	The SDT has modified the Certification standards to reference applicable Version 0 standards. These modifications should address the concerns expressed by commentors concerning duplication, clarity, and level of

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System Wayne Guttormson – SPC Ken Goldsmith – ALT Todd Gosnell – OPPD Alan Boesch – NPPD Jim Maenner – WPS Darrick Moe – WAPA Tom Mielnik – MEC Joe Knight – MRO 31 Additional Members				detail.
Manatoba Hydro Robert Coish		X		
Tennessee Valley Authority Kathleen Davis Chris Donilon	X			
CenterPoint Energy John Jointe Dennis Caufield	X			
Hydro One Networks, Inc. David Kiguel		X	If the above comments are satisfied, then these standards are ready for ballot.	The SDT has modified the Certification standards to reference applicable Version 0 standards. These modifications should address the concerns expressed by commentors concerning duplication, clarity, and level of detail.
MAAC John Horakh	X			
CP9, Reliability Standards Working Group Ralph Rufrano – NY Power Authority Peter Lebro- National Grid US Roger Champagne – TransEnergie David Kiguel – Hydro One Al Adamson – NY State Reliability Council Khaquan Khan – The IESO (Ont) Greg Campoli – NY ISO David Little – Nova Scotia Power Kathleen Goodman – ISO NE Guy Zito – Northeast Power Coord. Council		X	If the above comments are satisfied, then these standards are ready for ballot	The SDT has modified the Certification standards to reference applicable Version 0 standards. These modifications should address the concerns expressed by commentors concerning duplication, clarity, and level of detail.
First Energy Corp. Ray Morella	X			
Great River Energy Gordon Pietsch				
South Mississippi Electric Power Association Dan M Kay	X			

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Southwest Transmission Cooperative, Inc. Alan Wilkinson	X			
National Rural Electric Cooperative Association Bary Lawson				
Alabama Electric Cooperative Tim Hattaway	X			
Alabama Electric Cooperative Kenneth Skroback	X			
Dairyland Power Cooperative Ben Porath				

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

October 6, 2005

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

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

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

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

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

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

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

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

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