

## Transmission Operator Certification Standard – Posting 1 - Comments

*Our goal is to give every comment serious consideration in this process. If you feel that your comment has been overlooked or there has been an error or omission in the process, please contact Gerry Cauley immediately at 609-452-8060 or at [gerry.cauley@nerc.net](mailto:gerry.cauley@nerc.net). You may submit an appeal in accordance with the [Reliability Standards Appeals Process](#).*

### 1. Do you agree with the modifications made to the Transmission Operator Certification – Certification standard in removing the administrative process from the standard?

<p>General Comment: The comments received from the industry participants who provided comments supports the removal of the certification administrative process from the standard and to allow the CCC to develop the process. There were many comments that indicated the necessity for the process be developed through an open environment that allows industry input and that it not be developed in isolation by any one group. These concerns were forwarded to the CCC by the Certification Standard Drafting Team along with the specific comments received.</p>			
Commenter	Yes	No	Comment
Gerald Rheault Manitoba Hydro	X		The process to determine certification should be established by the CCC and implemented in a consistent manner for each entity applying to be certified for any Functional Model Entity.
Peter Burke [on behalf of ATC's Paul Steinberger, Bobbi Welch, Jason Shaver, Tim Beach, Bruce Teague]  American Transmission Co.	X		ATC agrees with the Standards Drafting Team that the administrative process could be developed separately, and that handing it over to the CCC should produce a consistent result. With that being said, ATC is concerned that the administrative process may not get the proper level of industry review. What has the Standard Drafting Team done to ensure that industry is going to be allowed the opportunity to review and comment on the administrative process? What obligations does the CCC have to post drafts and get industry feedback on the administrative process?
Southern Company- Transmission, Operations, Planning and EMS divisions Jim Griffith Southern Steve Corbin Southern Jim Viikinsalo Southern	X		

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Lisa Kelley Mississippi Power Rex Johnson Savannah Power Company Gary Gorham Alabama Power Company Billy Bush Gulf Power Company Jeff Stansell Georgia Power Company Matt Ansley Southern Raymond Vice Southern Mike Sanders Southern Mike Oatts Southern			
Anita Lee  Alberta Electrical System Operator			
Linda Campbell FRCC Mark Bennett - Gainesville Regional Utilities Steve Wallace - Seminole Electric Cooperative Steve McElhaney - Florida	X	X	We have believed the certification process itself should not be included from the initial SAR and support this change very much. However, we do believe it is crucial that the industry participate in the development of the certification process and the CCC must develop it in an open industry process, but one that is separate from the development of a reliability standard. It is important that this standard, and the certification process itself not be more onerous in terms of goals and objectives than the

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<p>Municipal Power Agency                  Alan Gale - City of Tallahassee                  Ted Hobson JEA                  Tom Washburn - Orlando Utilities Commission                  Tim Beyrle - Utilities Commission of New Smyrna Beach                  William Baldwin - Ft. Pierce Utilities Authority</p>			<p>reliability standards themselves.</p>
<p>The general comment addresses your comments.</p>			
<p>Compliance and Certification Committee                  Bob Harbour - Continental Cooperative Services                  Ted Hobson - JEA                  Greg Campoli - NYISO                  Paul Arnold - BPA – WECC                  Chuck Waits - METC - ECAR</p>	<p align="center">X</p>		<p>The Compliance and Certification Committee completely agrees with the modifications that remove the certification administration processes from the standard for all of the reasons stated above.</p> <p>Attached to this comment filing is the letter sent by CCC Chair Bob Harbour to the SAC Chair Linda Campbell on July 2, 2004 explaining the need to separate the certification administration elements from the standard. The main point from the letter states: "The CCC believes that the certification process (as well as other administrative processes) needs to be fully vetted with the industry participants. There are several ways to accomplish this without including the processes themselves as part of the standard. These include; a) posting the process along with the certification standard noting that comments are being accepted on the standard and process as separate but related documents, b) development of the process through the CCC allowing for posting and comments by the industry participants, c) through a Board approved procedure for the development of administrative procedures to be applied to the industry that may embody some or all of a and b." The CCC is grateful to the standard drafting team for removing those elements and looks forward to working with the team and the SAC to develop certification processes acceptable to the industry.</p>

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			<p>This is a general process comment and proposal that applies to parts 2 through 9 in this document. The development of the requirements in Section B is definitely best performed by the technical experts on the standard drafting team. They appear to be clearly written. However, the Compliance Section D should be separated and developed by compliance experts. Approval of the compliance section could done in a separate yet parallel process. The Measures in Section C tend to be vague and allow for wide interpretation if a certification team came to certify the entity. For example, what type and quality of documentation is needed to verify that processes and procedures meet the requirements? The measures in Section C affect the content of the Compliance section, which are driven by the requirements in Section B. The CCC proposes to have the technical experts on the standard drafting team work jointly with the compliance experts to develop clear measures in Section C. This is a process change that requires further discusssion with the Standards Authorization Committee.</p>
<p>Cinergy Corp Doug Hils Larry Conrad Walt Yeager</p>	<p align="center">X</p>		
<p>Southern Company Roman Carter Tony Reed Joel Dison Terry Crawley Tom Higgins Roger Green Lucius Burris</p>	<p align="center">X</p>		

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Lloyd Barnes			
RTO/ISO Standards Review Committee Dale McMaster - AESO Ed Riley - CAISO Sam Jones - ERCOT Peter Henderson - IESO Peter Brandien - ISO-NE Bill Phillips - MISO Karl Tammar - NYISO Bruce Balmat - PJM Charles Yeung - SPP	X		Provided that the certification process goes through an ANSI approved process
Operating Reliability Working Group (ORWG) Southwest Power Pool Ron Ciesiel - SPP Darrell Cipriany - AEP Bob Cochran - SPS Mike Gammon - KCPL Steve Hillman - WPEK Allen Klassen - Westar Bill Nolte - SECI Robert Rhodes - SPP Mike Stafford - GRDA	X		Incorporating the administrative process in the standard created some confusion as to what was standard and what was process. Removing the administrative materials eliminates that confusion.
Ed Riley California ISO	X		The CAISO agrees with removing the administrative process from the standard but still believe the certification process should be developed through an ANSI approved process.
Verne Ingersoll	X		

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Progress Energy - Carolinas			
Alex Cabrera Southern California Edison			No comment
Michael C. Calimano NYISO	X	X	NYISO agrees with the removal of the Administrative Process from the standards, however expects that once the process is developed it will go through the entire ANSI Certified Process.
The general comment addresses your comments.			
Travis Besier or Ellis Rankin TXU Electric Delivery Co.	X		
Kathleen Goodman ISO New England Inc	X	X	Agree that the Administrative Process should be removed from these standards, however expects that the process, once developed goes through the entire ANSI Certified process.
The general comment addresses your comments.			
Jack Alvarez New York State Reliability Council	X		Since it is possible for a single entity to perform more than one part of the Market Operations Functions, the Reliability Service Functions and/or the Planning & Operating Functions, organizations that will perform cross-functional tasks must clearly identify that they will be doing so in their application for certification. The CCC must ensure that they are aware of the cross functional tasks, and that the organization applying for the certification can successfully accomplish the requirements of each area they are applying for while maintaining the appropriate separation between operating the marketplace and electric operations.
P. D. Henderson IESO (Independent Electricity System Operator), Ontario	X		We agree that the Administrative Process should be removed from these standards, provided the process, once developed goes through the entire ANSI Certified process.
Kevin Conway GCPD	X		The Standards should only state what is to be met. How the Standards are met should be left to the entity, compliance committee, and the RRO.
Todd Johnson Salt River Project			I have no opinion on this.

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William J. Smith Allegheny Power	X		
Edward Davis Entergy Services, Inc		X	We suggest the certification requirements continue to be reviewed and modified through the standards development process. This process allows all industry participants to contribute to the certification requirements.
Industry consensus supports the removal of the procedure from the standard.			
NPCC CP9, Reliability Standards Working Group Ralph Rufano - New York Power Authority Kathleen Goodman - ISO-New England Bob Pelligrini - United Illuminating Khaqan Khan - The IESO Greg Campoli - New York ISO Al Adamson - The New York State Reliability Council David Kiguel - Hydro One Networks, Ontario Peter Lebro - US National Grid Brian Hogue - NPCC Guy Zito - NPCC	X	X	NPCC Agrees that the Administrative Process should be removed from these standards, however expects that the process, once developed goes through the entire ANSI Certified process.
The general comment addresses your comments.			
CenterPoint Energy Transmission Control/Real Time Operations John Jonte	X		

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Dennis Caufield			
TVA Kathy Davis Chuck Feagans James Regg Mitch Needham Bill Byrom Jerry Landers	X		
Elizabeth Howell International Transmission Company (ITC)	X		The intent of the Transmission Operator Certification Standard is to delineate the functional requirements and examine the extent to which the entity seeking certification is capable of performing the defined responsibilities. The process to determine that compliance is external to the function and should be performed by an independent review body to administer the process. We agree that administration of the certification process should not be a component of the standard itself.
John Horakh MAAC	X		
E. Nick Henery SMUD	X		
Edward C. Stein First Energy	X		The following comment should be added to the standard: 'The process for certification, which is developed by the Certification and Compliance committee or any future committee responsible for the process, is required to seek industry input and approval before the process is implemented'  The drafting Team should not ' anticipate that the CCC will seek industry input' but should require industry input and approval.

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

<p>General Comment: In general, those individuals who provided comments support the Introduction, Requirements, Measures, and Compliance elements of the standard. There were many suggestions for minor changes and clarifications that have been incorporated into the standard and will be available for comment in the next posting. Comments concerning the Certification Process have been forwarded to the CCC for consideration in their drafting of the Administrative Process for certification.</p>			
Commenter	Yes	No	Comment
Gerald Rheault Manitoba Hydro	X		
Peter Burke [on behalf of ATC's Paul Steinberger, Bobbi Welch, Jason Shaver, Tim Beach, Bruce Teague]  American Transmission Co.		X	<p>R1 and R2 are not requirements and should be eliminated. R1 simply states what is already known, that if an organization wants to be certified as a Transmission Operator then it must get certified. The other requirements, which are part of the of the Transmission Operator Certification, explain to an entity what is required in order to receive certification. R2 lets an entity who wants to get certified know that it can delegate requirements to other entities, but will still be required to show that all requirements are being achieved.</p> <p>These two should be part of the Administrative Process that the CCC is working on.</p>
<p>R1 is a requirement. Although it may appear that it is already known, it is not stated anywhere that an entity must be certified. This requirement identifies that fact that you state.</p> <p>R2 –In order to ensure that an entity retains the responsibility for a task that is delegated, it must be stated as a requirement in a standard to be enforceable for consideration in certifying an entity.</p>			
Southern Company- Transmission, Operations, Planning and EMS divisions		X	This document is seriously flawed and should be withdrawn from consideration until the Functional Model is modified. This proposed standard appears to mandate certain data gathering and analysis via the

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Jim Griffith - Southern Steve Corbin - Southern Jim Viikinsalo - Southern Lisa Kelley - Mississippi Power Rex Johnson - Savannah Power Company Gary Gorham - Alabama Power Company Billy Bush - Gulf Power Company Jeff Stansell - Georgia Power Company Matt Ansley - Southern Raymond Vice - Southern Mike Sanders - Southern Mike Oatts - Southern			certification process.
<p>The Functional Model is understood to be a living document that may change numerous times in the future and the Standards will then have to change with it. It is however, very important to pursue a certification process that is in place to help ensure the capability of entities responsible for the reliability of the system.</p> <p>The elements of the standard related to data acquisition were derived from the tasks and the relationships that were identified in the Functional Model.</p>			
Anita Lee  Alberta Electrical System Operator			
Linda Campbell - FRCC Mark Bennett - Gainesville Regional Utilities Steve Wallace - Seminole		X	A definition of “Agreements” was included on page 2. We note that there is already a definition of “Agreement” in the glossary of terms developed with VO reliability standards. The leading words state that terms already defined in the Reliability Standards Glossary of Terms will not be repeated. The

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<p>Electric Cooperative  Steve McElhaney - Florida  Municipal Power Agency  Alan Gale - City of  Tallahassee  Ted Hobson - JEA  Tom Washburn - Orlando  Utilities Commission  Tim Beyrle - Utilities  Commission of New Smyrna  Beach  William Baldwin - Ft. Pierce  Utilities Authority</p>		<p>definition provided with this draft standard is different that that in the glossary already. Although we believe the definition you have supplied is better we are unclear what the process is to change definitions of terms already in the glossary. This needs to be reviewed and clarified.</p> <p>In R2.3 it states that an entity that is delegated a task is “subject to review” to ensure....but it begs the question of by who and how? Is it the intent that the entity is subject to review by the Region as part of the certification process? Or, would it be more appropriate to place the responsibility on the TOP to provide the information to prove that the delegation is appropriate and the entity to which the task is delegated to is capable of meeting the requirements of the standards. This requirement needs to be clarified.</p> <p>In R3 it uses the words “address preparedness for adhering to NERC...” We think address preparedness is very ambiguous and suggest rewording to state “that enable them to adhere to NERC and Regional Reliability Standards.” We added Regional since the Regions are doing the certifying and may include adherence to Regional standards as well.</p> <p>R4 should be removed. It is redundant to the requirement stated in R3.</p> <p>R5.1-R5.7 should be removed. The requirement R5 should state certification is based on all the requirements defined in NERC Transmission Operator Certification Standards ORG-001 through ORG-008. The version numbers are not needed since they may change over time and we would not have to revise this to capture only those modifications.</p> <p>R7 should be removed. It is a process step and should be included in the process developed by the CCC to be followed as a requirement of R8.</p> <p>R8 – remove the word “NERC” used before Regional Reliability Organizations. Also the process name should be complete to agree with the name used in the purpose.</p> <p>M2 – add R2.1, R2.2 and R2.3 with R2</p> <p>M3- remove the reference to R4 since it should be deleted.</p>
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			<p>M4- the reference to R9 should be changed to R7 since two requirements should be removed.</p> <p>D 1.1.1 – change R4 to R3</p> <p>D 1.1.2 – change from R5 through R9 to R4 through R7. Also, to who will the RRO’s demonstrate adherence to?</p>
<p><b>Definition of Agreements</b></p> <p>R2.3 – The intent of the requirement was that if the certification review team deemed it necessary, that they may review the entity that has been delegated the specific task.</p> <p>R3 – The inclusion of Regional Standards is not appropriate since the certification being developed is for the NERC Certification. The capability exists that if there are Regional differences, that they be identified during the standard drafting process for inclusion in the standard that is approved.</p> <p>R4 – The standard will be modified based on your comments.</p> <p>R5 - The standard will be modified to include the standard numbers rather than the titles.</p> <p>R7 – In removing the process from the standard, the Drafting Team believes that a site-visit is a requirement that must be included in the Certification Standard. Based on the comments received, the industry agrees with the DT beliefs.</p> <p>R8 – We have modified the standard to maintain consistency.</p> <p>M2 – R2 is all inclusive.</p> <p>M3 &amp; M4 – The document has been modified.</p> <p>D1.1.1 &amp; D1.1.2 – have been reformatted to include who has the responsibility and not to re-state the monitoring elements. This will be consistently applied in all of the Organizational Standards.</p>			
<p>Compliance and Certification Committee</p> <p>Bob Harbour - Continental Cooperative Services</p> <p>Ted Hobson - JEA</p>			

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Greg Campoli - NYISO Paul Arnold - BPA – WECC Chuck Waits - METC - ECAR			
Cinergy Corp Doug Hils Larry Conrad Walt Yeager	X		<p>A 4 "Applicability", this should not be applicable to the Regional Reliability Organization. If the RTO is also the Transmission Operator then the entity should register as and be subjected to the certification process.</p> <p>B, Requirements, R2 allows for Transmission Operators to delegate certain tasks but there is no requirement in the Agreements standard to cover this action. If an entity is allowed to pass certain tasks to another entity then an agreement should be in place outlining what is expected of the entity taking on the tasks.</p> <p>R4. In the first sentence after "procedures, processes or tools...", change "or" to "and".</p>
Southern Company Roman Carter Tony Reed Joel Dison Terry Crawley Tom Higgins Roger Green Lucius Burris Lloyd Barnes		X	They may be incomplete. Within the current work of the FMRSCF, there may be changes to the TOP's required functions within the Functional Model. If so, will they be added into this standard after this Comment period but before posting 2 for this Standard.
The Functional Model is understood to be a living document that may change numerous times in the future and the Standards will then have to change with it. If the changes to the TOP are known at the time of the next posting, they will be incorporated, but it is anticipated that if they are not, they will be picked-up in the following posting.			
RTO/ISO Standards Review Committee Dale McMaster - AESO	X		<p>1) The standard needs to be clarified to state that one certification process is all that is necessary for a TOP which operates across multiple regions.</p> <p>2) Requirement 2.3 states that the entity to which a task is delegated is</p>

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<p>Ed Riley - CAISO                  Sam Jones - ERCOT                  Peter Henderson - IESO                  Peter Brandien - ISO-NE                  Bill Phillips - MISO                  Karl Tammar - NYISO                  Bruce Balmat - PJM                  Charles Yeung - SPP</p>			<p>subject to review to ensure that the capability exists for them to perform the task as required in the standard. What standard is it referring to? Please clarify or drop the reference to standard.</p>
<p>Operating Reliability Working Group (ORWG)                  Southwest Power Pool                  Ron Ciesiel - SPP                  Darrell Cipriany - AEP                  Bob Cochran - SPS                  Mike Gammon - KCPL                  Steve Hillman - WPEK                  Allen Klassen - Westar                  Bill Nolte - SECI                  Robert Rhodes - SPP                  Mike Stafford - GRDA</p>	<p align="center">X</p>		<p>Insert "shall" in R.2.1 such that the requirement reads: "Transmission Operators may delegate tasks, but shall retain responsibility." This makes the requirement stronger and clearly indicates that the Transmission Operator is still responsible for the task.</p> <p>R6, R7, R8 and R9 appear to be administrative tasks for the RRO and therefore should be removed from the standard. This being the case, Measure M4 and Compliance item 1.1.2 need to be modified accordingly.</p>
<p>Ed Riley                  California ISO</p>	<p align="center">X</p>		<p>1) The standard needs to be clarified to state that only one certification process is necessary for a TOP which operates across multiple regions.</p> <p>2) Requirement 2.3 states that the entity to which a task is delegated is subject to review to ensure that the capability exists for them to perform the task as required in the standard. This needs to be clarified to indicated that it is referring to the delegated task from the TOP Certification Standard.</p>
<p>Verne Ingersoll                  Progress Energy - Carolinas</p>		<p align="center">X</p>	

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<p>Alex Cabrera Southern California Edison</p>		<p align="center">X</p>	<p>The prohibition to the delegation of responsibilities, and disallowance of non-overlapping electrical areas contained in the NERC Functional Model and Requirement R2.1 ("Transmission Operators may delegate tasks, but retain responsibility"), contained in ORG-001-1 – Certification, creates challenges for the CAISO and its Participating Transmission Owners (PTO) in regards to adherence to existing tariffs, policies, and procedures. This prohibition should not be included in the Certification standard.</p> <p>The operation of the Bulk Power Transmission System jurisdictional to the CAISO is a collaborative and coordinated process between the CAISO and each PTO. Each component of this system jurisdictional to the CAISO and each PTO has been identified in accordance with FERC approved tariff language and agreed to operating procedures.</p> <p>One example of this collaborative and coordinated process would be control of the Bulk Power Transmission system voltage. Each PTO is responsible for and develops voltage profiles, associated limits, and procedures for its area. The CAISO, using established PTO voltage profiles, limits, and procedures, develops an overarching plan and procedure for the entire CAISO jurisdictional area. In Real Time, The PTO's monitor and control their system to the respective voltages for their area. The CAISO monitors the PTO's adherence to agreed to voltage profiles and has the authority to instruct action when needed to maintain proper voltages across the entire CAISO area. This example illustrates that it is problematic, contrary to agreed upon tariffs and procedures, and possibly detrimental to reliability, to require the use of "equipment" or "voltage levels" as a determining factor for designating a responsible entity for specific tasks as defined in the Functional Model.</p>
<p>Although the PTO is the entity that will initiate the action for voltage control, the CAISO as the Transmission Operator will still maintain the responsibility. There is nothing that precludes the CAISO from delegating this task to the PTO. If Southern Cal Edison wishes to have the responsibility, they would then have to register and certify as a Transmission Operator.</p>			
<p>Michael C. Calimano NYISO</p>		<p align="center">X</p>	<p>Change wording of R2.3 to "The Transmission Operator shall ensure that the entities it delegates tasks to are in fact qualified to perform those tasks"</p>

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			The standard needs to be clarified to state that one certification process is all that is necessary for a TOP which operates across multiple regions
<p>R.2.2 and R.2.3 have been modified to reflect your suggestion.</p> <p>The intent of the certification is that if an entity operates across regional boundaries, only one certification may be required, but it must involve both regions. This should be clarified in the administrative process being developed by the CCC. The comment has been forwarded to the CCC.</p>			
Travis Besier or Ellis Rankin TXU Electric Delivery Co.	X		
Kathleen Goodman ISO New England Inc		X	In ORG-001-1 , R2.3 suggest that the wording be changed to  The Transmission Operator shall ensure that the entities it delegates tasks to are in fact qualified to perform those tasks. Recommend the Transmission Operator and any entity the control room tasks are delegated are Certified (at least one person per shift at all times).
<p>Although your suggestions is not specifically covered in R.2.3, it is captured in the ORG-003-1-Transmission Operator Certification - Personnel – R.1.</p>			
Jack Alvarez New York State Reliability Council	X		
P.D. Henderson IESO (Independent Electricity System Operator), Ontario	X		<p>1) The standard needs to be clarified to state that one certification process is all that is necessary for a TOP which operates across multiple regions.</p> <p>2) Requirement 2.3 states that the entity to which a task is delegated is subject to review to ensure that the capability exists for them to perform the task as required in the "standard". What standard is it referring to? Please clarify or drop the reference to standard?</p>
Kevin Conway		X	I have been unable to view the material after repeated attempts.

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GCPD			
We are sorry for your inability to view the material, in the future, please contact the NERC office to remedy your situation.			
Todd Johnson Salt River Project	X		
William J. Smith Allegheny Power	X		Requirement R2.3 specifies that "The entity, to which a task is delegated, is subject to review...". The reviewing entity needs to be specified. Will the entity be reviewed by the RRO or the delegating entity?
Edward Davis Entergy Services, Inc		X	R.2.2 states that the Transmission Operator will identify any task that will be performed by another entity. However, there does not seem to be a requirement, and there should be a requirement, that the "other entity" sign a Confidentiality Agreement.  Measure M1 states that the Transmission Operator should provide evidence of certification for each Reliability Authority in which it operates. Here RA should be replaced with RRO. It is the RRO that certifies the Transmission Operator and that should only need to be done once per RRO, not once per RA.
<p>R.2.2 The delegated entity will be subject to whatever criteria that is related to the task that they are performing. If a confidentiality agreement between the two entities is desired, that is a business issue that is outside the scope of the Certification Standard. If the task requires that the entity sign a Confidentiality Agreement, then the delegated entity would be required to do so.</p> <p>M1 – There was an error in the standard and the Reliability Authority Area should have been the Transmission Operator Area. We apologize for the error and thank you for identifying it to us. The SDT will also develop a definition for what is meant by Transmission Operator Area.</p>			
NPCC CP9, Reliability Standards Working Group Ralph Rufano - New York Power Authority Kathleen Goodman - ISO-New England Bob Pelligrini - United		X	In ORG-001-1 , R2.3 NPCC suggests that the wording be changed to  The Transmission Operator shall ensure that the entities it delegates tasks to are in fact qualified to perform those tasks. NPCC recommends the Transmission Operator and any entity the control room tasks are delegated are Certified (at least one person per shift at all times).

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<p>Illuminating                  Khaqan Khan - The IESO                  Greg Campoli - New York ISO                  Al Adamson - The New York State Reliability Council                  David Kiguel - Hydro One Networks, Ontario                  Peter Lebro - US National Grid                  Brian Hogue - NPCC                  Guy Zito - NPCC</p>			
<p>Although your suggestions is not specifcally covered in R.2.3, it is captured in the ORG-003-1-Transmission Operator Certification - Personnel – R.1.</p>			
<p>CenterPoint Energy                  Transmission Control/Real Time Operations                  John Jonte                  Dennis Caufield</p>		<p align="center">X</p>	<p>This standard requires that the Regional Reliability Organization use the NERC Certification Process for Transmission Operators to perform certification for an entity that intends to perform the transmission operations function. It is possible that the same organization can register as the Transmission Operator and also be the Regional Reliability Organization. This could lead to a conflict of interest. See sections R6, R8, R9, M4, D1.1.2 and D1.3</p> <p>The wording of Requirements R2.3 should be modified to: The entity, to which a task is delegated, is subject to an on-site visit by the proposed NERC Certification Audit Team to ensure that the capability exists for them to perform the task as required in the standard.</p>
<p>In the process that was removed from the standard and forwarded to the CCC for development, it stated that “Review team members shall not be employees of the Applicant or any of its affiliates.” This wording along with your comments have been received by the CCC for consideration in their drafting effort.</p> <p>We have modified R.2.2 and R.2.3 to address these concerns.</p>			

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TVA Kathy Davis Chuck Feagans James Regg Mitch Needham Bill Byrom Jerry Landers	X		
Elizabeth Howell International Transmission Company (ITC)	X		<p>R2.1 Suggest including "to other entities" after "may delegate tasks".</p> <p>R2.2 Suggest including "and document" after "identify".</p> <p>R2.3 Should clarify who's review the entity is subject to, presumably the Regional Reliability Authority in this case. Suggest rewording the latter part of the sentence to "to ensure that they have the capability to perform the task as required in the standard."</p> <p>R3 Suggest replacing "preparedness for" with "capability to".</p> <p>R6 The use of "Organizations" is a bit confusing. I think the author means that there may be more than one Regional Reliability Organization, not that there are other kinds of Organizations. If that is the case, it would be clearer to replace "Organization" with "Organization(s)".</p> <p>R7 Suggest adding "by the Regional Reliability Organization." to the end of the sentence.</p>
John Horakh MAAC		X	Just a minor correction. In M2 and M3, replace "will" with "shall".
Changes have been made to reflect your suggestion.			
E. Nick Henery SMUD	X		Remove any reference to the Reliability Authority and reference Reliability Coordinator to be consistent with Version 0 Standards.
Edward C. Stein First Energy	X		

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

General Comment: Based on the comments received, industry consensus was not obtained at this time. The Drafting Team will modify this standard based on the comments received and seek industry affirmation in the next posting.			
Commenter	Yes	No	Comment
Gerald Rheault Manitoba Hydro	X		
Peter Burke [on behalf of ATC's Paul Steinberger, Bobbi Welch, Jason Shaver, Tim Beach, Bruce Teague]  American Transmission Co.		X	<p>1. ATC would like to review a copy of the NERC Confidentiality Agreement referred to in R1. Please define what personnel are required to read this agreement. Does it require training of personnel not having access to confidential information? ATC is concerned that this requirement may duplicative, at best, and conflictive, at worst, with the existing FERC requirements as defined under the FERC Standards of Conduct. If the intent here is mimic what has been accomplished by FERC, ATC feels that this requirement is unnecessary as Transmission Operators are already mandated by FERC Order to follow the Standards of Conduct rules.</p> <p>2. The proposed standard is unnecessarily restrictive in specifying what agreements must be joined and who must join in those agreements in order to provide each of the services described. ATC supports requirements to procure these services; but would like flexibility in how it meets the requirements outlined under each of the contemplated agreements. For example, ATC, as a member of the Midwest ISO, is required to meet the terms and conditions of a Transmission Operator as described under the Midwest ISO's (MISO) FERC-approved Energy Markets Tariff (EMT). The EMT specifies many of the same requirements outlined in Section R.2 of this proposed standard (see MISO EMT Section 38.7). The MISO tariff likewise applies simultaneously to many entities and categories of NERC functional entities within the MISO footprint. Another problem that ATC has identified with this proposed standard is that an entity cannot contract with itself. This is an issue for any entity registering as more than one function under the NERC functional model. For example, this proposed standard contemplates that an</p>

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			<p>entity which is the Transmission Owner would need to have an agreement with a Transmission Operator. What if they are one and the same? Instead, the standard should allow for or recognize other ways to impose obligations, such as existing federal or state laws or federal approved tariffs (like the Midwest ISO's). Finally, ATC is concerned with the specificity of Section R.9 which requires Transmission Operators to execute an agreement with Balancing Authorities to shed load. ATC agrees with the need for load shedding agreements, but it should be up to the Transmission Operator as to how these arrangements are made. For example, ATC has Transmission to Distribution Interconnection Agreements with the entities in its area for load shed services, who happen to be the same entities as those that are providing the Balancing Authority services. Again to avoid potential conflict of language, ATC does not see a need to propagate additional agreements with the same party for similar services. ATC supports having a standard that defines what requirements must be met, either by agreements or by another means (including federal laws, state laws or other applicable tariffs); but does not support the designation of how those requirements are met.</p> <p>3. A Transmission Operator has the requirement to obtain all the agreements listed, but there is no reciprocal obligation from the other entities that they have these same agreements. This creates opportunities for legal blackmail. The SDT should require all entities to have a reciprocal obligation.</p> <p>4. ATC requests the standard team to consider whether or not a requirement to provide data exchange services under the NERC standards by anyone desiring to become/maintain a NERC registered entity is sufficient to guarantee the provision of these services; i.e. is an agreement necessary if required under standards? (R2.1, R2.2, R2.3, R5.1)</p>
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1. The standard has been modified to clarify the intent. The standard for certification cannot assume that all parties seeking certification are FERC jurisdictional and therefore must have means to ensure that all parties maintain the confidentiality of reliability information. This standard does not impose any new restrictions beyond that which companies are abiding by today when they sign both the FERC and/or NERC documents.
2. The Drafting Team will modify the standard to be less prescriptive of who has to provide what information. The drafting team in conjunction with NERC Legal Counsel went to great measures to develop a definition for agreements that would allow an entity to use a multitude of vehicles to satisfy this requirement. With regards to an entity having an agreement with itself or others, this does not mandate that there is a written agreement with and between themselves or other parties, but could be satisfied with an internal operating procedure, interconnection agreement, etc., that addresses the issue.
3. The Drafting Team believes that adherence to the definition of agreement provides the level of reciprocity that is needed and desired.
4. The agreements provide a means for measuring an entities preparedness to accomplish defined tasks and responsibilities. Certification Standards are a measure of an entity’s capability to perform the tasks. The agreements provide a contractual obligation between parties to provide the necessary data.

<p>Southern Company- Transmission, Operations, Planning and EMS divisions Jim Griffith - Southern Steve Corbin - Southern Jim Viikinsalo - Southern Lisa Kelley - Mississippi Power Rex Johnson - Savannah Power Company Gary Gorham - Alabama Power Company Billy Bush - Gulf Power Company Jeff Stansell - Georgia Power</p>		<p align="center">X</p>	<p>NERC has a NERC Data Confidentiality Agreement. NERC does not have a NERC Confidentiality Agreement. Add “Data” in each of the above requirements between NERC and Confidentiality.</p> <p>R2.4 - Add to the end of the sentence: “as mutually agreed upon consistent with applicable laws and/or regulations”.</p> <p>R3.2 - Add to the end of the sentence: “as determined by the Transmission Operator for reliability”.</p>
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Company Matt Ansley - Southern Raymond Vice - Southern Mike Sanders - Southern Mike Oatts - Southern			
The drafting team has reviewed NERC documents and the use of NERC Confidentiality Agreement is appropriate. R.2.4 – Applicable laws and regulations should be included in the agreements. R.3.2 – The agreements standard will be reformatted to be less prescriptive and the drafting team will consider your comments in the new draft.			
Anita Lee  Alberta Electrical System Operator			
Linda Campbell - FRCC Mark Bennett - Gainesville Regional Utilities Steve Wallace - Seminole Electric Cooperative Steve McElhaney - Florida Municipal Power Agency Alan Gale - City of Tallahassee Ted Hobson - JEA Tom Washburn - Orlando Utilities Commission Tim Beyrle - Utilities Commission of New Smyrna Beach William Baldwin - Ft. Pierce Utilities Authority		X	An overall comment on this standard is that the requirement for so many agreements seems to be very burdensome. However, based on the definition of “Agreements” that is provided with this standard, FRCC would assume that our Security Process Document (Regional Reliability Plan) would cover many of these requirements. We do have particular concern with several of the requirements listed:  R1.2 states that the TOP shall have documentation identifying the TOP personnel are trained... What personnel is this requirement referring to? Is the intent to mean System Operators, or would it apply to every employee of a company that has registered as a TOP? The current wording is very broad and ambiguous.  R3, R3.1 and R3.2 requires the TOP to have agreements with Generator Owners. In some cases in the FRCC Region there are generators that have been operating for many years under the authority granted by Regulators (cogenerators for example). The agreements (if any) may be very broad and may not address the particular items in R3.1 and R3.2. That does not necessarily mean they do not operate appropriately or provide the necessary information to the TOP, but the agreements

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			<p>themselves may not meet this requirement. There should be a mechanism in place that recognizes these older agreements and the fact that they may not be able to be changed.</p> <p>In R4, just as in R3, the Generator Operators may have old agreements as well that do not address reactive supply and avr. And, the TOPs may not have the leverage to go in and change these existing agreements that have been place many years.</p> <p>R8 seems to be very ambiguous. In fact members of FRCC interpreted it two different ways. The statement in R8 could mean that the agreement between the TOP and TSP covers everything, including implementation of a DC tie. Or, it could also mean that you only need an agreement if you have a DC tie. What about ATC, or other things related to the use of the transmission system? This requirement needs to be clarified.</p>
<p>R.1.2 The standard has been modified to clarify the intent</p> <p>R3, R3.1, R3.2, and R.4 – The requirements that have been identified must be satisfied in order to be awarded certification. If there are older agreements that cannot be changed, an alternative may be to develop an operating procedure that will address the issue and satisfy the requirement. This is just one example of how an entity may meet the requirement, but the requirement must be satisfied.</p> <p>R8 The Certification Standards were developed based on the Functional Model. In accordance with the Version 2 of the model, the only relationship between the TOP and the TSP is related to the operation of DC ties. All other TSP functions are with entities other than the TOP.</p>			
<p>Compliance and Certification Committee</p> <p>Bob Harbour - Continental Cooperative Services</p> <p>Ted Hobson - JEA</p> <p>Greg Campoli - NYISO</p> <p>Paul Arnold - BPA – WECC</p> <p>Chuck Waits - METC - ECAR</p>			

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<p>Cinergy Corp Doug Hils Larry Conrad Walt Yeager</p>	<p align="center">X</p>		<p>Although the need for agreements is supported, as written they appear to be confusing and appear to contain overlapping agreements with multiple entities. Requirements R3.2. This agreement might be better served between the Generation Owner and Generation Operator. The Transmission Operator should have the agreement as stated in R4.1. with the Generation Operator, would be sufficient to cover this item.</p> <p>R4.4. This is a very broad statement and could be a Code of Conduct issue. Does this mean anything on the grid affecting the generator? This needs to be changed to represent equipment directly affecting the generators ability to run and avoid stating transmission system.</p> <p>R9.2. This requirement could be removed. Generation facility data is covered in requirement R3.1. and is required to be supplied by the Generation Owner. R9.2. requirement as written gives the impression that the Balancing Authority will have information concerning facility data that is not known by the Generation Owner. Add items in R4 to cover generator maintenance plans and generation facility data as agreements between Generator Operator and Transmission Operator. This would keep the data flow consistent.</p>
<p>Southern Company Roman Carter Tony Reed Joel Dison Terry Crawley Tom Higgins Roger Green Lucius Burris Lloyd Barnes</p>		<p align="center">X</p>	<p>It is particularly important for Nuclear Power Plants who are bound by law to ensure their licensing requirements are met for the offsite power supply to equipment required for safe shutdown. It would seem appropriate for the nuclear standard "Nuclear Offsite Power Supply Reliability" to be coordinated with and referenced by this standard.1. R2.4 - Add to the end of the sentence: "as mutually agreed upon consistent with applicable laws and/or regulations".R3.2 - Add to the end of the sentence: "as determined by the Transmission Operator for reliability".</p>
<p>NERC has refrained from referencing one specific standard in another standard.</p> <p>R.2.4 – Applicable laws and regulations should be included in the agreements.</p> <p>R.3.2 – The agreements standard will be reformatted to be less prescriptive and the drafting team will consider your comments in the new draft.</p>			

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<p>RTO/ISO Standards Review Committee                  Dale McMaster - AESO                  Ed Riley - CAISO                  Sam Jones - ERCOT                  Peter Henderson - IESO                  Peter Brandien - ISO-NE                  Bill Phillips - MISO                  Karl Tammar - NYISO                  Bruce Balmat - PJM                  Charles Yeung - SPP</p>		<p>X</p>	<p>1) Requirement 1.1 should be deleted as its intent is included in requirement 1.2</p> <p>2) For each element in Requirements 2 through 11: replace the word "commitment" with "obligation" Obligation is a stronger word.</p> <p>3) We understand that the tasks were obtained using the Functional Model, however, we believe that this standard needs to reflect actual situations. we therefore recommend that requirement 2.3 be modified to be "Obligation to provide transmission maintenance plans to the reliability authority" (Drop construction plans). Construction plans will typically come from the transmission owner directly or through the transmission operator. If construction plans must be provided, then requirement 7 needs to be modified.</p> <p>4) Requirement 3.1 Change to "Obligation to operate the transmission system to respect the generator facility ratings provided by the Generator Operator".</p> <p>5) Add a new requirement R3.3 Obligation of Generator Owner to provide the generator information as requested by the Transmission Operator.</p> <p>6) Modify requirement 4.1 "The Generator Operators's obligation to provide the transmission Operator with reactive supply and to immediately report any change in status of automatic voltage regulators or Power System Stabilizers".</p>
<p>1) The standard has been modified to reflect this suggestion.</p> <p>2) The drafting team reviewed the comment and has elected to keep the word “commitment”.</p> <p>3) The tasks were derived from the Functional Model and therefore the agreements should reflect the necessary elements to complete the tasks.</p> <p>4) The use of the word “within” appears to be more suited for this requirement.</p> <p>5) The reformatting of the Agreements requirements will be less prescriptive of who has to provide the information. Requirement 4 of this standard does require that the Generator Operator provide the TOP with certain information. The requirement of getting this information will remain, what will change is who it has to come from.</p> <p>6) The standard has been modified to incorporate your suggestions.</p>			

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<p>Operating Reliability Working Group (ORWG)                  Southwest Power Pool                  Ron Ciesiel - SPP                  Darrell Cipriany - AEP                  Bob Cochran - SPS                  Mike Gammon - KCPL                  Steve Hillman - WPEK                  Allen Klassen - Westar                  Bill Nolte - SECI                  Robert Rhodes - SPP                  Mike Stafford - GRDA</p>	<p align="center">X</p>		<p>Although the requirements and associated measures for agreements are necessary when more than one functional entity is involved, what type of agreements are needed if the functional entities are one and the same corporate entity? Shouldn't the standard be structured to allow such relationships?</p> <p>The required agreements appear to be derived from the Functional Model. If this is the case, there are a few disconnects between the Functional Model and the draft standard. (1) Requirement R10 belongs to the Planning Authority, not the Transmission Planner. As such, Requirement R10.1 should be moved to R5 and become R5.3. (2) Although Requirement R9.2 is a valid requirement, there is no associated linkage in the Functional Model. The Functional Model does require the Generator Operator to provide the information to the Balancing Authority but there is no specific requirement on the part of the Balancing Authority to provide the information to the Transmission Operator. This appears to be a shortcoming of the Functional Model. (3) The Functional Model requires the Resource Planner to coordinate with and collect data for resource planning from the Transmission Operator among others. This relationship is not included in the draft standard. (4) The Functional Model also requires the Load Serving Entity, Balancing Authority and the Transmission Operator to work together on implementing load shedding. The relationship between the Load Serving Entity and the Transmission Operator is also not included in the draft standard.</p> <p>References to Generator Owner, Generator Operator and agreement in Requirements R3 and R4 should be changed to indicate the possibly of multiple owners, operators or agreements such as Generator Owner(s), Generator Operator(s) and agreement(s).</p> <p>Reverse "reports" and "status" in Requirement R4.1 such that it reads "The Generator Operator's commitment to provide the Transmission Operator with reactive supply and status reports of automatic voltage regulators."</p>
<p>Ed Riley                  California ISO</p>		<p align="center">X</p>	<p>1) Requirement 1.1 should be deleted as it is impossible to confirm that someone has "read and understands" something. The intent is included in requirement 1.2 by requiring training.</p>

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			<p>2) For each element in Requirements 2 through 11: replace the word "commitment" with "obligation". Obligation is a stronger word.</p> <p>3) We understand that the tasks were obtained using the Functional Model, however, we believe that this standard needs to reflect actual situations. we therefore recommend that requirement 2.3 be modified to be "Obligation to provide transmission maintenance plans to the reliability authority" (Drop construction plans). Construction plans will typically come from the transmission owner directly or through the transmission operator. If construction plans must be provided, then requirement 7 needs to be modified.</p> <p>4) Requirement 3.1 Change to "Obligation to operate the transmission system to respect the generator facility ratings provided by the Generator Operator".</p> <p>5) Add a new requirement R3.3 Obligation of Generator Owner to provide the generator information as requested by the Transmission Operator.</p> <p>6) Modify requirement 4.1 "The Generator Operator's obligation to provide the transmission Operator with reactive supply and to immediately report any change in status of automatic voltage regulators or Power System Stabilizers".</p>
<p>1) The requirement in the standard has been modified.</p> <p>2) The drafting team reviewed the comment and has elected to keep the word "commitment".</p> <p>3) The tasks were derived from the Functional Model and therefore the agreements should reflect the necessary elements to complete the tasks.</p> <p>4) The use of the word "within" appears to be more suited for this requirement.</p> <p>5) The reformatting of the Agreements requirements will be less prescriptive of who has to provide the information. Requirement 4 of this standard does require that the Generator Operator provide the TOP with certain information. The requirement of getting this information will remain, what will change is who it has to come from.</p> <p>6) The standard has been modified to incorporate your suggestions.</p>			
Verne Ingersoll Progress Energy - Carolinas		X	
Alex Cabrera		X	To address the issue identified in SCE's comments regarding question 2

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Southern California Edison			(Certification standard), maintain reliable operation, and adhere to the core aspect of the Functional Model (the designation of a responsible entity), the Agreements standards should include a requirement for an agreement that defines the sharing of responsibilities of the Transmission Operator function where the responsibilities and tasks are shared by multiple entities according to existing tariffs and operating procedures. The agreement should encompass the six tasks of the Transmission Operator from the Functional Model, give a general introduction as to how the entities address the responsibility for each task, and identifies Operating Procedures for each entity that covers the specific details of each task.
It is anticipated that the agreements will identify delegations along with any shared responsibilities that exist. However, the TOP will maintain responsibility for the tasks.			
Michael C. Calimano NYISO		X	<p>Delete requirement 1.1, its intent is included in 1.2</p> <p>For each element in Requirements 2 through 11, replace the word "commitment" with "obligation"</p> <p>3.1 change to "Obligation to operate the transmission system to respect the generator facility ratings provided by the Generator Operator".</p> <p>Add new requirement 3.3 Obligation of Generator Owner to provide the generator information as requested by the Transmission Operator</p> <p>Modify requirement 4.1 "The Generator Operator's obligation to provide the Transmission Operator with reactive supply and to immediately report any change in status of automatic voltage regulators or Power System Stabilizers".</p> <p>Change R-5 "The Transmission Operator shall have agreement(s) with the Planning Authority. The agreement shall include the following:," to "The Transmission Operator shall have agreement(s) with the Planning Authority to provide the following:"</p>

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<p>1.1 The standard has been modified to reflect this suggestion.                  The drafting team reviewed the comment and has elected to keep the word “commitment”.                  The use of the word “within” appears to be more suited for this requirement.                  The reformatting of the Agreements requirements will correct this problem and be less prescriptive of who has to provide the information. Requirement 4 of this standard does require that the Generator Operator provide the TOP with certain information. The requirement of getting this information will remain, what will change is who it has to come from.                  The standard has been modified to incorporate your suggestions.</p>			
Travis Besier or Ellis Rankin TXU Electric Delivery Co.	X		
Kathleen Goodman ISO New England Inc		X	<p>CHANGE R-5 The Transmission Operator shall have agreement(s) with the Planning Authority. The agreement shall include the following :</p> <p>TO</p> <p>The Transmission Operator shall have agreement(s) with the Planning Authority to provide the following:</p>
<p>The reformatting of the Agreements requirements should correct this problem.</p>			
Jack Alvarez New York State Reliability Council	X		
P. D. Henderson IESO (Independent Electricity System Operator), Ontario		X	<p>Requirement 1.1 should be deleted as its intent is included in requirement 1.2</p> <p>For each element in Requirements 2 through 11: replace the word "commitment" with "obligation". Obligation is a stronger word.</p> <p>We understand that the tasks were obtained using the Functional Model, however, we believe that this standard needs to reflect actual situations. we therefore recommend that requirement 2.3 be modified to be "Obligation to provide transmission maintenance plans to the reliability authority" (Drop</p>

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		<p>construction plans). Construction plans will typically come from the transmission owner directly or through the transmission operator. If construction plans must be provided, then requirement 7 needs to be modified.</p> <p>The requirement 3.1 needs to be changed to read as follows: "Obligation to operate the transmission system to respect the generator facility ratings provided by the Generator Operator".</p> <p>Add a new requirement R3.3 Obligation of Generator Owner to provide the generator information as requested by the Transmission Operator.</p> <p>Modify requirement 4.1 "The Generator Operators's obligation to provide the transmission Operator with reactive supply and to immediately report any change in status of automatic voltage regulators or Power System Stabilizers".</p> <p>CHANGE the statement in R-5 from quoted "The Transmission Operator shall have agreement(s) with the Planning Authority. The agreement shall include the following:...." to the following statement i.e. "The Transmission Operator shall have agreement(s) with the Planning Authority to provide the following:</p> <p>Delete "construction plans" from R5.1</p> <p>The requirement R6 should be revised as follows: " The Transmitter Operator shall have agreement(s) with each of the Load Serving Entity and distribution Providers in its area....."</p> <p>R6.1 should reflect the LASE role as well i.e. "R6.1 to be revised as follows " The LSE and Distribution Providers ....."</p> <p>It needs to be clarified that why is R8.1 requirements being restricted to only DC tie operations and not phase angles related requirements etc....</p> <p>With regards to requirement R9.1, please clarify that who has the obligation to reduce voltage or shed load? Is it Balancing Authority or Transmission Operator"</p> <p>With regards to section C "Measures": the specific measures should be</p>
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			listed pertaining to each requirement of this standard.
<p>1.1 The standard has been modified to reflect this suggestion.</p> <p>The drafting team reviewed the comment and has elected to keep the word “commitment”.</p> <p>The reformatting of the Agreements requirements will correct this problem and be less prescriptive of who has to provide the information. The requirements of getting the information will remain, what will change is who it has to come from.</p> <p>The use of the word “within” appears to be more suited for this requirement.</p> <p>The Functional Model identifies that the only relationship between the TOP and the TSP is for the operation of DC lines.</p> <p>The measures have been drafted to reflect the format of the Version 0 standards.</p>			
Kevin Conway GCPD		X	In a single utility that performs the TOP, GOP, GO, TO, BA, LSE, PSE and RA functions, it appears that the Agreements will be an administrative headache. It appears by reading this standard that a vertically integrated utility will have to identify, develop and maintain many Agreements internally, between what NERC identifies as the entities business units. This requirement will become overly burdensome, and should be modified to allow when a single entity performs and controls multiple functions.
<p>The drafting team in conjunction with NERC Legal Counsel went to great measures to develop a definition for agreements that would allow an entity to use a multitude of vehicles to satisfy this requirement. With regards to an entity having an agreement with itself or others, this does not mandate that there is a written agreement with and between themselves or other parties, but could be satisfied with an internal operating procedure, interconnection agreement, etc., that addresses the issue.</p>			
Todd Johnson Salt River Project	X		
William J. Smith Allegheny Power	X		
Edward Davis Entergy Services, Inc		X	There should be a statement that entities performing more than one Functional Model set of functions will not be required to develop "agreements" between the functions within that organization. For instance,

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			<p>an entity that is the transmission owner and transmission operator should not be required to develop "agreements" between these internal functions.</p> <p>Please change "Reliability Authority" to "Reliability Coordinator throughout this standard.</p> <p>R2.4 states that the Transmission Operator commits to implement corrective actions as directed by the Reliability Authority (Coordinator). This requirement should be deleted. If not deleted then it must be modified to state (THE Transmission Operator DOES WHAT THE RC SAYS UNLESS IT VIOLATES .....)</p> <p>R3.2 states the Generator Owners commit to provide voltage support and is a duplicate of R4.1. Please delete this R3.2.</p> <p>There should be an additional Requirement stating that the "Transmission Operator shall have agreements with all entities to whom the Transmission Operator has delegated tasks to be performed by that entity. The agreements shall include the following ...1) Signed NERC Confidentiality Agreement ... 2) ....." .</p>
<p>The drafting team in conjunction with NERC Legal Counsel went to great measures to develop a definition for agreements that would allow an entity to use a multitude of vehicles to satisfy this requirement. With regards to an entity having an agreement with itself or others, this does not mandate that there is a written agreement with and between themselves or other parties, but could be satisfied with an internal operating procedure, interconnection agreement, etc., that addresses the issue.</p> <p>The standards will be modified to address you suggestion.</p> <p>2.4 It is currently identified in the Functional Model that the TOP will implement action as directed by the Reliability Authority. As the Functional Model is revised, if this situation changes, the standard will be modified to reflect the change.</p> <p>3.2 The standard will be reformatted to be less prescriptive of who supplies what information. This should eliminate your concern.</p> <p>The standard will be modified to reflect your concern with additional requirements regarding delegation of tasks.</p>			
<p>NPCC CP9, Reliability Standards Working Group</p>		<p align="center">X</p>	<p>CHANGE R-5 The Transmission Operator shall have agreement(s) with the Planning Authority. The agreement shall include the following :</p>

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<p>Ralph Rufano - New York Power Authority                  Kathleen Goodman - ISO-New England                  Bob Pelligrini - United Illuminating                  Khaqan Khan - The IESO                  Greg Campoli - New York ISO                  Al Adamson - The New York State Reliability Council                  David Kiguel - Hydro One Networks, Ontario                  Peter Lebro - US National Grid                  Brian Hogue - NPCC                  Guy Zito - NPCC</p>			<p>TO                  The Transmission Operator shall have agreement(s) with the Planning Authority to provide the following:</p>
<p>The standard will be reformatted to be less prescriptive of who supplies what information. This should eliminate your concern.</p>			
<p>CenterPoint Energy                  Transmission Control/Real Time Operations                  John Jonte                  Dennis Caufield</p>	<p align="center">X</p>		<p>An additional sub-section in Requirement R2 should be added that defines the Reliability Authority's commitment to provide redispatch information to Transmission Operators.</p>
<p>TVA                  Kathy Davis                  Chuck Feagans                  James Regg                  Mitch Needham</p>	<p align="center">X</p>		

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Bill Byrom Jerry Landers			
Elizabeth Howell International Transmission Company (ITC)			<p>Agreement definition: ITC supports the variety of means listed to satisfy the definition of Agreement. Some of the Agreements required have the potential to overlap requirements of the Balancing Authority and may be duplicative. For example, if the TOp has an agreement to provide data to the BA and the BA has an agreement to provide data to the RA, does the TOp need a separate agreement with the RA? Another example, the BA needs an agreement with the TOp to shed load and the TOp needs an agreement with the DP to shed load, does an agreement between the BA and DP accomplish the same thing? Should recognize that there may be multiple way to accomplish the same thing, given the role of the BA in coordination between parties. Requiring duplicative agreements among entities does not help clarify responsibility. R5.2 Do not agree with this requirement relative to the Planning Authority. Load shedding agreements are already addressed elsewhere.</p>
<p>The reformatting of the Agreements requirements will correct this problem and be less prescriptive of who has to provide the information. The requirements of getting the information will remain, what will change is who it has to come from.</p>			
John Horakh MAAC	X		<p>In general, this seems like a rather complex way to organize the Transmission Operator certification, with eight standards to cover one objective. Also, there is some amount of "duplication", especially between this Agreements standard and other standards. This is not "wrong", just complex, and requiring care that all the parts "match".</p>
E. Nick Henery SMUD		X	<ol style="list-style-type: none"> <li>1. Eliminate the reference to the Reliability Authority and replace with the Reliability Coordinator.</li> <li>2. In general the listed requirements are either too broad or not broad enough, depending on the Regions contractual structure. An example is that there is no commitment listed to require the Generation Owner or Operator to commit to a Remedial Action Scheme, that is, the requirements of the Owner and Operator of a Generator or a Distribution Provider simply address voltage support. An interconnection and operating agreement between a Generator (owner and operator) or a Distribution Provider and the Transmission Operator is much more comprehensive.</li> </ol>

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			<p>3. In order to ensure that all reliability standards are met by the Agreements executed by the Transmission Operator, it is recommended that the responsibility and authority to approve the Agreements with the Transmission Operator is at the Regional level. In addition, the standard requires only the “Agreements must be in place defining the responsibilities and authority of the Transmission Operator with the (Function), which its facilities are connected and Agreements shall address both normal and emergency operations.”</p> <p>4. The requirements in this standard are duplicated in the other Standards, i.e. Emergency Operations Standard, System Analysis Standard, and so on all require Agreements.</p>
<p>1. The standards will be modified to address you suggestion.</p> <p>2. The reformatting of the Agreements requirements will correct this problem and be less prescriptive of who has to provide the information. The requirements of getting the information will remain, what will change is who it has to come from.</p> <p>3. The intent of the certification process is that the review team will be responsible to ensure that the key elements are included in the agreements.</p> <p>4. There may be instances where the standards could be construed as duplicated, but the Certification Standards are intended to be a one-time measurement of an entity’s capability to perform their registered functions. Other reliability standards cover elements of on-going operations.</p>			<p>This standard addresses numerous agreements that the Transmission Operator must have with various Functional Model entities. The Drafting Team needs to consider what constitutes an acceptable agreement.</p>
<p>Edward C. Stein First Energy</p>	<p align="center">X</p>		<p>This standard addresses numerous agreements that the Transmission Operator must have with various Functional Model entities. The Drafting Team needs to consider what constitutes an acceptable agreement.</p>

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

<p>General Response: Based on the comments received, it does not appear that consensus was obtained with regards to current elements of the standard. The drafting team has modified the standard based on the comments received and will seek industry affirmation in the next TOP posting.</p>			
Commentor	Yes	No	Comment
Gerald Rheault Manitoba Hydro	X		
Peter Burke [on behalf of ATC's Paul Steinberger, Bobbi Welch, Jason Shaver, Tim Beach, Bruce Teague]  American Transmission Co.		X	B R1.1.3 states the TO will notify the Generator Operators of transmission system problems. To be clear and consistent with this standard, Standard ORG-002, "Agreements," Part B, should specify a corresponding agreement.
<p>The reformatting of the Agreements requirements will be less prescriptive of who has to provide the information. The requirements of getting the information will remain, what will change is who it has to come from.</p>			
Southern Company- Transmission, Operations, Planning and EMS divisions Jim Griffith - Southern Steve Corbin - Southern Jim Viikinsalo - Southern Lisa Kelley - Mississippi Power Rex Johnson - Savannah Power Company Gary Gorham - Alabama Power Company Billy Bush - Gulf Power	X		R1 - In the second line between Operator and responsibilities add the word "reliability".  R1.1 - Between Operator and responsibilities add the word "reliability".

**Transmission Operator Certification Standard – Posting 1 - Comments**

<p>Company                  Jeff Stansell - Georgia Power Company                  Matt Ansley - Southern                  Raymond Vice - Southern                  Mike Sanders - Southern                  Mike Oatts - Southern</p>			
<p>Anita Lee                  Alberta Electrical System Operator</p>			
<p>Linda Campbell - FRCC                  Mark Bennett - Gainesville Regional Utilities                  Steve Wallace - Seminole Electric Cooperative                  Steve McElhaney - Florida Municipal Power Agency                  Alan Gale - City of Tallahassee                  Ted Hobson - JEA                  Tom Washburn - Orlando Utilities Commission                  Tim Beyrle - Utilities Commission of New Smyrna Beach                  William Baldwin - Ft. Pierce Utilities Authority</p>		<p align="center">X</p>	<p>Requirements R1.1 and R1.1.1 – R1.1.7 are not really requirements. The requirement is to have certified operators who perform those tasks. Since they are not stand alone requirements, and more a definition of what real time tasks are, we would suggest keeping them in the R1 section, but show them as a list of bullets. Of particular note, R1.1.3 indicates notification to Generator Operators of transmission system problems. TOPs may not be able to share details of transmission system problems due to Standard of Conduct restrictions. This should be reconsidered.</p> <p>In R2, change the reference to R1.1 to just R1 based on our recommendation above for bullets.</p> <p>In the Compliance Monitoring Process section, need to add “during the certification process” to the end of the sentence.</p>

**Transmission Operator Certification Standard – Posting 1 - Comments**

R1.1.1 – R1.1.7 – Your suggestion is being incorporated into the next draft in the TOP standard as it was done in the BA.

The reformatting of the Agreements requirements will be less prescriptive of who has to provide the information. The requirements of getting the information will remain, what will change is who it has to come from. It is understood that communications between entities must still comply with their Code of Conduct and in the case of the TOP, the NERC Confidentiality Agreement.

This standard is applicable to the Certification Process only.

Compliance and Certification Committee Bob Harbour - Continental Cooperative Services Ted Hobson - JEA Greg Campoli - NYISO Paul Arnold - BPA – WECC Chuck Waits - METC - ECAR			
Cinergy Corp Doug Hils Larry Conrad Walt Yeager	X		R.1.1.4 Suggest changing the sentence to read "Request Reliability Authority to "assist in mitigating" equipment overloads. Problems should be handled together and as written appear to simply hand off responsibility to the RA.
Southern Company Roman Carter Tony Reed Joel Dison Terry Crawley Tom Higgins Roger Green Lucius Burris Lloyd Barnes	X		

**Transmission Operator Certification Standard – Posting 1 - Comments**

<p>RTO/ISO Standards Review Committee                  Dale McMaster - AESO                  Ed Riley - CAISO                  Sam Jones - ERCOT                  Peter Henderson - IESO                  Peter Brandien - ISO-NE                  Bill Phillips - MISO                  Karl Tammar - NYISO                  Bruce Balmat - PJM                  Charles Yeung - SPP</p>		<p align="center">X</p>	<p>1) Need to be specific that delegated tasks require that the entity performing those tasks does not need to be a certified entity but must have NERC certified system operators performing those tasks as identified in R1.1.1. through R1.1.7.</p> <p>2) Requirement 1.1.7 needs to be clarified as to its intent. We understand the task came from the Functional Model but as written it is unclear as to which personnel it applies to. Does the Transmission Service Provider need to be a NERC certified system operator?</p>
<p>1) Issues related to the delegation of task are identified in the ORG-001-1 standard.</p> <p>2) The standard states that they are Transmission Operator tasks and is not meant to imply that the TSP operators be certified unless they are performing a delegated task that requires System Operator certification.</p>			
<p>Operating Reliability Working Group (ORWG)                  Southwest Power Pool                  Ron Ciesiel - SPP                  Darrell Cipriany - AEP                  Bob Cochran - SPS                  Mike Gammon - KCPL                  Steve Hillman - WPEK                  Allen Klassen - Westar                  Bill Nolte - SECI                  Robert Rhodes - SPP                  Mike Stafford - GRDA</p>	<p align="center">X</p>		<p>Generator Operators may need to be informed about transmission system problems but such action must be tempered by FERC confidentiality requirements. This should be captured in Requirement R1.1.3.</p> <p>Suggest changing Measure M1 to read "The Transmission Operator shall maintain certification records of each operator, as identified in Requirement R1, and shall make such records available for inspection."</p> <p>Suggest changing Measure M2 to read "The Transmission Operator shall maintain records of all training activities for each operator, as identified in Requirement R2, and shall make such records available for inspection."</p>
<p>Ed Riley                  California ISO</p>		<p align="center">X</p>	<p>1) Need to be specific that delegated tasks require that the entity performing those tasks does not need to be a certified entity but must have</p>

**Transmission Operator Certification Standard – Posting 1 - Comments**

			NERC certified system operators performing those tasks as identified in R1.1.1. through R1.1.7.
1) Issues related to the delegation of task are identified in the ORG-001-1 standard.			
Verne Ingersoll Progress Energy - Carolinas		X	
Alex Cabrera Southern California Edison			No comment
Michael C. Calimano NYISO		X	Need to be specific that delegated tasks require that the entity performing those tasks does not need to be certified but must have NERC certified operators performing those task as identified in R1.1.1 through R1.1.7 Requirement R1.1.7 needs to be clarified, Does the Transmission Service Provider need to be a NERC certified system operator?
1) Issues related to the delegation of task are identified in the ORG-001-1 standard. 2) The standard states that they are Transmission Operator tasks and is not meant to imply that the TSP operators be certified unless they are performing a delegated task that requires System Operator certification.			
Travis Besier or Ellis Rankin TXU Electric Delivery Co.	X		
Kathleen Goodman ISO New England Inc		X	ISO-NE is concerned that the tests for the entities for the tasks identified in R1 are not yet available.  ISO-NE believes that this standard should apply only to control room operators only.
There are several credentials that personnel can obtain to satisfy this requirement. The NERC System Operator Certification Program has a Reliability Operator; Balancing, Interchange and Transmission; and Transmission Operator credential, of which all would apply.  The intent of the standard is that regardless of who performs the task, if the task is identified on the list in the standard, it must be performed by a NERC Certified Individual.			
Jack Alvarez New York State Reliability	X		

**Transmission Operator Certification Standard – Posting 1 - Comments**

Council			
<p>P. D. Henderson IESO (Independent Electricity System Operator), Ontario</p>		<p>X</p>	<p>1) In R1 the terminologies for certification credentials "Transmission", "Balancing Interchange and Transmission" and "Reliability" needs to clearly defined.</p> <p>2) R1.1.4 should be revised as " Request Reliability authority or act to mitigate equipment overloads"</p> <p>3) R 1.1.6 should be revised as: "Direct Load Serving Entity and Distribution Providers to shed load"</p> <p>5) Need to be specific that delegated tasks require that the entity performing those tasks does not need to be a certified entity but must have NERC certified system operators performing those tasks as identified in R1.1.1. through R1.1.7.</p> <p>6) Requirement 1.1.7 needs to be clarified as to its intent. We understand the task came from the Functional Model but as written it is unclear as to which personnel it applies to. Does the Transmission Service Provider need to be a NERC certified system operator?</p> <p>7) section D compliance : 1.1: should be revised as follows: " The Transmitter Operator shall provide documentation that demonstrates that all system operating pesonnel performing....."</p>
<p>1) The standard has been modified to reflect your suggestion.</p> <p>2) The drafting team has elected to keep the wording as is since the first bullet covers the TOP doing the mitigation themselves.</p> <p>3) The standard has been modified to be less prescriptive.</p> <p>5) The standard has been modified to clarify this issue.</p> <p>6) The standard states that they are Transmission Operator tasks and is not meant to imply that the TSP operators be certified unless they are performing a delegated task that requires System Operator certification.</p> <p>7) The compliance monitor responsibility is being reformatted to reflect other standard formats.</p>			

**Transmission Operator Certification Standard – Posting 1 - Comments**

Kevin Conway GCPD		X	Some of these items seem to duplicate the PER-001-0 through PER 003-1 Standards on Operator Certification and Training. These are best left in the Certification and training standards.
There may be instances where the standards could be construed as duplicated, but the Certification Standards are intended to be a one-time measurement of an entity's capability to to perform their registered functions. Other reliability standards cover elements of on-going operations.			
Todd Johnson Salt River Project	X		
William J. Smith Allegheny Power	X		
Edward Davis Entergy Services, Inc		X	There should also be a Requirement that all tasks delegated to another entity be performed by NERC Certified Operators that have signed the NERC Confidentiality Agreement. Please change "Reliability Authority" to "Reliability Coordinator" thoughtout this standard.

**Transmission Operator Certification Standard – Posting 1 - Comments**

The standards will be modified to address you suggestion.			
NPCC CP9, Reliability Standards Working Group Ralph Rufano - New York Power Authority Kathleen Goodman - ISO-New England Bob Pelligrini - United Illuminating Khaqan Khan - The IESO Greg Campoli - New York ISO Al Adamson - The New York State Reliability Council David Kiguel - Hydro One Networks, Ontario Peter Lebro - US National Grid Brian Hogue - NPCC Guy Zito - NPCC		X	NPCC is concerned that the tests for the entities for the tasks identified in R1 are not available.  NPCC believes that this standard should apply only to control room operators only.
There are several credentials that personnel can obtain to satisfy this requirement. The NERC System Operator Certification Program has a Reliability Operator; Balancing, Interchange and Transmission; and Transmission Operator credential, of which all would apply.  The intent of the standard is that regardless of who performs the task, if the task is identified on the list in the standard, it must be performed by a NERC Certified Individual.			
CenterPoint Energy Transmission Control/Real Time Operations John Jonte	X		

**Transmission Operator Certification Standard – Posting 1 - Comments**

Dennis Caufield			
TVA Kathy Davis Chuck Feagans James Regg Mitch Needham Bill Byrom Jerry Landers	X		
Elizabeth Howell International Transmission Company (ITC)	X		R1.1 This is a list of tasks to define "real-time Transmission Operator responsibilities", not a list of requirements. Should be presented accordingly.
John Horakh MAAC	X		
E. Nick Henery SMUD	X		Eliminate the reference to the Reliability Authority and replace with the Reliability Coordinator.
Edward C. Stein First Energy	X		

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

<p>General Response: Although many comments received support the current elements of this standard, there are several modification that will be required based on other comments that were received. The drafting team will modify the standard and seek industry affirmation in the next posting.</p>			
Commenter	Yes	No	Comment
Gerald Rheault Manitoba Hydro	X		
Peter Burke [on behalf of ATC's Paul Steinberger, Bobbi Welch, Jason Shaver, Tim Beach, Bruce Teague]  American Transmission Co.		X	<p>The Standard may reasonably require the TO to monitor frequency but should not require the same precision of measurement that would be necessary for a Balancing Authority. A Transmission Operator is not required to perform all the associated calculations that include a frequency measurement as an input. A Balancing Authority has to be able to calculate ACE, for example, and therefore needs a frequency measurement that has a narrow tolerance, but a Transmission Operator does not have to perform this calculation. A Transmission Operator monitors frequency to determine the overall state of the system and to facilitate system restoration. The standard should clearly delineate between the requirements for a Transmission Operator relative to a Balancing Authority.</p> <p>Measure 4 states that the TO shall demonstrate that it can follow its processes, procedures and use its tool...", but Requirement 4 does not require the TO to have processes or procedures. The following term should be removed "...follow its processes, procedures, and use its tools for..." and replace with "monitoring".</p> <p>New Measure would read: The TO shall demonstrate that it can monitor the elements identified and are applicable in Requirement 4.</p>
<p>The standard does not require any specific details related to frequency. The operational issues that you reference will be covered by other standards.</p> <p>The standard has been modified to address the issue that you raise.</p>			
Southern Company- Transmission, Operations,		X	R.2.3. and R.2.4 - Automatic notification and monitoring of system protection schemes and AVR status for each unit, requires certification for

**Transmission Operator Certification Standard – Posting 1 - Comments**

<p>Planning and EMS divisions                  Jim Griffith - Southern                  Steve Corbin - Southern                  Jim Viikinsalo - Southern                  Lisa Kelley - Mississippi Power                  Rex Johnson - Savannah Power Company                  Gary Gorham - Alabama Power Company                  Billy Bush - Gulf Power Company                  Jeff Stansell - Georgia Power Company                  Matt Ansley - Southern                  Raymond Vice - Southern                  Mike Sanders - Southern                  Mike Oatts - Southern</p>			<p>monitoring requirements which are not currently required in any NERC standard. This requirement appears to be an arbitrary addition not supported by approved standards.</p>
<p>The standard does not require automatic notification with regards to the elements that you identified.</p>			
<p>Anita Lee                   Alberta Electrical System Operator</p>			
<p>Linda Campbell - FRCC                  Mark Bennett - Gainesville Regional Utilities                  Steve Wallace - Seminole Electric Cooperative                  Steve McElhaney - Florida Municipal Power Agency</p>		<p align="center">X</p>	<p>On the website, this document is labeled ORG-004-1 which fits with the previous standards. However, on the standard form itself, this one is identified by TOP-012-1. This does not seem to be correct and is confusing. We would suggest they all be ORG standards since they deal with organization certification.</p> <p>The wording of R1.2 is more a requirement of the submitting entity. We would suggest rewording R1.2 to read “The data reporting requirement</p>

**Transmission Operator Certification Standard – Posting 1 - Comments**

<p>Alan Gale - City of Tallahassee                  Ted Hobson - JEA                  Tom Washburn - Orlando Utilities Commission                  Tim Beyrle - Utilities Commission of New Smyrna Beach                  William Baldwin - Ft. Pierce Utilities Authority</p>			<p>shall include data for real time monitoring, operations planning, and real time assessment.” Then R1.2.1- R1.2.3 are not needed.</p> <p>R2.4 requires the Generator Operators to provide data to the TOP. Should this be revised to place the requirement on the BA’s to collect this and provide to the TOP.</p> <p>In R3.1, only real time data is to be provided to the RA. We suggest that Operations planning data also be a requirement of the TOP to supply to the RA.</p> <p>For R4, we would suggest to reword to “The Transmission Operator shall have processes, procedures and tools to monitor its.....” The added words make it more clear and correspond to the measure identified in M4.</p> <p>For Compliance Monitoring, we suggest rewording 1.1.1 to state “The Transmission Operator shall demonstrate the ability to adhere to Requirements R1 through R4 during the certification process.”</p>
<p>The numbering of the standards will be modified to reflect the current numbering convention of all standards.</p> <p>The wording in the standard R1.2 will be modified to reflect your suggestion.</p> <p>R2.4 – The standard has been modified to be less prescriptive of who supplies the information.</p> <p>R3.1 – It is assumed that operations planning data would be a part of R3.2.</p> <p>R4 has been modified to reflect the suggested wording.</p> <p>The compliance monitor responsibility is being reformatted to reflect other standard formats.</p>			
<p>Compliance and Certification Committee                  Bob Harbour - Continental Cooperative Services                  Ted Hobson - JEA                  Greg Campoli - NYISO                  Paul Arnold - BPA – WECC                  Chuck Waits - METC - ECAR</p>			

**Transmission Operator Certification Standard – Posting 1 - Comments**

Cinergy Corp Doug Hils Larry Conrad Walt Yeager	X		R2.1. This should be expanded upon to allow reception of information directly from the Generation Owner or Generation Operator. This would allow those cases where the holding company is both the Transmission Operator and the Balancing Authority. As written this standard would require agreements to be in place requiring information routed from the Balancing Authority to the Transmission Operator. This would require agreements internally for some companies that may not necessarily be needed to collect data. In the case where the holding company is both the TO and BA the data collection might be performed by a shared system negating a need for an agreement. This could also apply to R2.2 and R2.3 if the TO is also the owner.
Southern Company Roman Carter Tony Reed Joel Dison Terry Crawley Tom Higgins Roger Green Lucius Burriss Lloyd Barnes		X	R.2.3. and R.2.4, Automatic notification and monitoring of system protection schemes and AVR status for each unit, requires certification for monitoring requirements which are not currently required in any NERC standard. This appears to be an arbitrary addition not supported by approved standards.
The standard does not require automatic notification with regards to the elements that you identified.			
RTO/ISO Standards Review Committee Dale McMaster - AESO Ed Riley - CAISO Sam Jones - ERCOT Peter Henderson - IESO Peter Brandien - ISO-NE Bill Phillips - MISO Karl Tammar - NYISO	X		1) Number is incorrect: it should be ORG-004-1 2) Requirement 2.3 may in fact come from the Transmission Owner or the Transmission Planner. The requirement should reflect that condition. Also any changes made in this section will require parallel obligation in the agreements section.

**Transmission Operator Certification Standard – Posting 1 - Comments**

Bruce Balmat - PJM Charles Yeung - SPP			
Operating Reliability Working Group (ORWG) Southwest Power Pool Ron Ciesiel - SPP Darrell Cipriany - AEP Bob Cochran - SPS Mike Gammon - KCPL Steve Hillman - WPEK Allen Klassen - Westar Bill Nolte - SECI Robert Rhodes - SPP Mike Stafford - GRDA	X		
Ed Riley California ISO	X		1) Number is incorrect: it should be ORG-004-1 2) Requirement 2.3 may in fact come from the Transmission Owner or the Transmission Planner. The requirement should reflect that condition. Also any changes made in this section will require parallel obligation in the agreements section.
Verne Ingersoll Progress Energy - Carolinas		X	
Alex Cabrera Southern California Edison			No comment
Michael C. Calimano NYISO	X		Number TOP-012-1 needs to be changed to ORG-004-1
Travis Besier or Ellis Rankin TXU Electric Delivery Co.		X	R2.4 should be changed to read: "Generator facility data and real-time operational data from Generator Operators within its transmission area." "Generator reactive supply," and "status of automatic voltage regulator" are specific items that are included in facility and real-time data. There are

## Transmission Operator Certification Standard – Posting 1 - Comments

			no other specific items listed in any of the other sections. In fact, R1 places the responsibility for the required specific information on the Transmission Operator.
The specifics that you have mentioned were added as a result of previous industry comments that wanted more specifics of what information was required. The drafting team believes that these elements are required to ensure that an entity can appropriately perform the tasks associated with their responsibilities.			
Kathleen Goodman ISO New England Inc	X		
Jack Alvarez New York State Reliability Council	X		
P. D. Henderson IESO (Independent Electricity System Operator), Ontario		X	<p>1) re: section "Number" TOP-012-1 should be corrected to read "ORG-004-1"</p> <p>2) Requirement 2.3 may in fact come from the Transmission Owner or the Transmission Planner. The requirement should reflect that condition. Also any changes made in this section will require parallel obligation in the agreements section.</p> <p>3)the words "construction plans" should be deleted from R3.2 because this is a task that should be assigned to the transmission owners rather than the TOP. We recognize that this is in the current Functional Model, but we feel strongly that this is a TO function.</p> <p>4) R3.3 should be revised as follows" Coordinate and resolve conflicts with adjacent Transmission Operators"</p>
<p>1) The numbering of the standards will be modified to reflect the current numbering convention of all standards.</p> <p>2) The standard has been revised to be less prescriptive of who supplies the information.</p> <p>3) Construction plans are a part of the standard based on the elements of the Functional Model.</p> <p>4) The coordination between the TOP and adjacent TOPs are beyond just conflicts and should be reflected as such in the standard. An element of coordination is intended to include both conflicts and non-conflicting situations.</p>			

**Transmission Operator Certification Standard – Posting 1 - Comments**

Kevin Conway GCPD		X	The requirements for Data are too open ended. A term like "appropriate data" should be used. The Transmission Operators will not want all data from some of these sources, just the data that is pertinent for them to fulfill their responsibilities.
The details of the data identified was a result of previous comments received during the SAR process.			
Todd Johnson Salt River Project	X		
William J. Smith Allegheny Power		X	Requirement R2.1 infers that Transmission Operators only get "Generation facility data, real-time operational data and generator maintenance plans" from the Balancing Authority. It is also possible for the Transmission Operator to receive the above data directly from the Generator Owner/Operator. This requirement should specify "Balancing Authority or Generator Owner/Operator."
The standard has been revised to be less prescriptive of who supplies the information.			
Edward Davis Entergy Services, Inc		X	<p>Please change "Reliability Authority" to "Reliability Coordinator" throughout this standard.</p> <p>Please add "Generator Owners and Generator Operators" to R2.1 so that it reads "... from Balancing Authorities, Generator Owners and Generator Operators within it transmission area." The interconnection contracts are between the Generator Owners / Operators and the Transmission Owner / Operator. Therefore, the information on generators is supplied by the generator owners and operators to the Transmission Owner / Operator. Depending on which entity performs the BA functions, the Balancing Authority may not have information on generators owned by IPPs or QFs.</p>

**Transmission Operator Certification Standard – Posting 1 - Comments**

<p>The standards will be modified to address you suggestion.                  The standard has been revised to be less prescriptive of who supplies the information.</p>			
NPCC CP9, Reliability Standards Working Group Ralph Rufano - New York Power Authority Kathleen Goodman - ISO-New England Bob Pelligrini - United Illuminating Khaqan Khan - The IESO Greg Campoli - New York ISO Al Adamson - The New York State Reliability Council David Kiguel - Hydro One Networks, Ontario Peter Lebro - US National Grid Brian Hogue - NPCC Guy Zito - NPCC	X		
CenterPoint Energy Transmission Control/Real Time Operations John Jonte Dennis Caufield	X		
TVA Kathy Davis Chuck Feagans	X		Purpose - If this is a Transmission Operator Certification, why is Reliability Authority mentioned in the Purpose? We recommend it be deleted

**Transmission Operator Certification Standard – Posting 1 - Comments**

James Regg Mitch Needham Bill Byrom Jerry Landers			
Elizabeth Howell International Transmission Company (ITC)	X		R2.1 requires generation data be from the BA and R2.4 required generation data be acquired from the GO. Would rather see a single requirement listing the generation data needed and flexibility to obtain the data from the BA or the GO - the physical flow should not matter as long as the end result is achieved.
John Horakh MAAC	X		
E. Nick Henery SMUD	X		Eliminate the reference to the Reliability Authority and replace with the Reliability Coordinator.
Edward C. Stein First Energy	X		

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

<p>General Response: Based on the comments received, industry consensus supports the elements of the System Analysis standard. Although this consensus has been obtained, there will be modification made to provide further clarifications to elements identified in comments received.</p>			
Commenter	Yes	No	Comment
Gerald Rheault Manitoba Hydro	X		
Peter Burke [on behalf of ATC's Paul Steinberger, Bobbi Welch, Jason Shaver, Tim Beach, Bruce Teague]  American Transmission Co.		X	R3 requires the TO to determine the required reactive resources and arrange for interconnected services to ensure voltage support. Please define what is meant by the terms "arrange" and "interconnected operations service." If the words "arrange" and "interconnected operations service" are intended to incorporate the concept of procurement and payment, the TO may not have the ability to purchase such services, under some circumstances. In ATC's situation, the TO, in concert with the Reliability Authority, can determine the required amount and location of reactive resources; but can then only request its Balancing Authorities to provide these resources. Payment for the provision of reactive services is "arranged" by the Transmission Provider (as opposed to the Transmission Operator).
<p>The standard has been modified to clarify the issue. A critical function of the TOP is ensuring that the necessary reactive resources are obtained to control the system voltage.</p>			
Southern Company- Transmission, Operations, Planning and EMS divisions  Jim Griffith - Southern Steve Corbin - Southern Jim Viikinsalo - Southern Lisa Kelley - Mississippi Power Rex Johnson - Savannah		X	R4 appears to be an arbitrary addition not supported by approved standards. As currently written, NERC standards state that an entity will remain in compliance as long as they observe the identified thermal, voltage, and stability limits - whether or not those limits are calculated in real-time (from a state estimator) or off-line (from a planning load flow model or stability model). Please provide the reference to current NERC standards that supports this certification requirement that all these operating limits must be calculated in real-time.

**Transmission Operator Certification Standard – Posting 1 - Comments**

<p>Power Company  Gary Gorham - Alabama Power Company  Billy Bush - Gulf Power Company  Jeff Stansell - Georgia Power Company  Matt Ansley - Southern  Raymond Vice - Southern  Mike Sanders - Southern  Mike Oatts - Southern</p>			
<p>The standard does not state that the limits have to be calculated during real-time operations as you interpret. The standard states that limits have to be developed for real-time operations which is intended to mean that the limits have to be established to be utilized during real-time operations and wording has been modified to clarify this.</p>			
<p>Anita Lee  Alberta Electrical System Operator</p>			
<p>Linda Campbell - FRCC  Mark Bennett - Gainesville Regional Utilities  Steve Wallace - Seminole Electric Cooperative  Steve McElhaney - Florida Municipal Power Agency  Alan Gale - City of Tallahassee  Ted Hobson - JEA  Tom Washburn - Orlando Utilities Commission</p>		<p align="center">X</p>	<p>On the website, this document is labeled ORG-005-1 which fits with the previous standards. However, on the standard form itself, this one is identified by TOP-013-1. This does not seem to be correct and is confusing. We would suggest they all be ORG standards since they deal with organization certification.</p> <p>R1, R2 and R3 need to have the words added “for its transmission area”.</p> <p>We would suggest rewording R4 to read “The Transmission Operator shall develop operating limits (thermal, voltage, and stability) for real-time operations within its transmission area.</p> <p>The words “during the certification process.” need to be added to the end of the sentence in D1.1.1</p>

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Tim Beyrle - Utilities Commission of New Smyrna Beach  William Baldwin - Ft. Pierce Utilities Authority			
<p>The numbering of the standards will be modified to reflect the current numbering convention of all standards.</p> <p>R1, R2, R3 – The SDT has made a modification to R4 for consistency, but does not believe adding additional wording would add any clarification to the requirements. The identification of the area of responsibility is identified in the standard purpose.</p> <p>R4 - The standard has been modified to reflect your suggestion.</p> <p>D1.1.1 - The compliance monitor responsibility is being reformatted to reflect other standard formats.</p>			
Compliance and Certification Committee  Bob Harbour - Continental Cooperative Services  Ted Hobson - JEA  Greg Campoli - NYISO  Paul Arnold - BPA – WECC  Chuck Waits - METC - ECAR			
Cinergy Corp  Doug Hils  Larry Conrad  Walt Yeager	X		
Southern Company  Roman Carter  Tony Reed  Joel Dison  Terry Crawley		X	R4 appears to be an arbitrary addition not supported by approved standards. As currently written NERC standards state that entity will remain in compliance as long as they observe the identified thermal, voltage, and stability limits - whether or not those limits are calculated in real-time (from a state estimator) or off-line (from a planning load flow model or stability model). Please provide the reference to current NERC

**Transmission Operator Certification Standard – Posting 1 - Comments**

Tom Higgins Roger Green Lucius Burris Lloyd Barnes			standards that supports this certification requirement that all these operating limits must be calculated in real-time.
The standard does not state that the limits have to be calculated during real-time operations as you interpret. The standard states that limits have to be developed for real-time operations which is intended to mean that the limits have to be established to be utilized during real-time operations and wording has been modified to clarify this.			
RTO/ISO Standards Review Committee Dale McMaster - AESO Ed Riley - CAISO Sam Jones - ERCOT Peter Henderson - IESO Peter Brandien - ISO-NE Bill Phillips - MISO Karl Tammar - NYISO Bruce Balmat - PJM Charles Yeung - SPP	X		Number is not correct: it should be ORG-005-1
Operating Reliability Working Group (ORWG) Southwest Power Pool Ron Ciesiel - SPP Darrell Cipriany - AEP Bob Cochran - SPS Mike Gammon - KCPL Steve Hillman - WPEK Allen Klassen - Westar Bill Nolte - SECI	X		

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Robert Rhodes - SPP Mike Stafford - GRDA			
Ed Riley California ISO	X		Number is not correct: it should be ORG-005-1
Verne Ingersoll Progress Energy - Carolinas		X	
Alex Cabrera Southern California Edison			No comment
Michael C. Calimano NYISO	X		Number TOP-013-1 needs to be changed to ORG-005-1
Travis Besier or Ellis Rankin TXU Electric Delivery Co.	X		TXU Electric Delivery agrees with the System Analysis standard but suggests a minor word change.  The sentence labeled B.R3 should be changed to read:"The Transmission Operator shall determine the required reactive resources and arrange for any necessary interconnection operations services to ensure voltage support."
Kathleen Goodman ISO New England Inc	X		
Jack Alvarez New York State Reliability Council	X		
P. D. Henderson IESO (Independent Electricity System Operator), Ontario	X		1) In section "Number" TOP-013-1 should be corrected to read "ORG-005-1"  2) In section B. requirements, a leadin sentence/qualifier should be added such as "The Transmitter Operator shall have processes, procedures and plans in place including:"
Kevin Conway	X		

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GCPD			
Todd Johnson Salt River Project	X		
William J. Smith Allegheny Power	X		
Edward Davis Entergy Services, Inc		X	Please change "Reliability Authority" to "Reliability Coordinator" throughout this standard.
The standards will be modified to address you suggestion.			
NPCC CP9, Reliability Standards Working Group Ralph Rufano - New York Power Authority Kathleen Goodman - ISO-New England Bob Pelligrini - United Illuminating Khaqan Khan - The IESO Greg Campoli - New York ISO Al Adamson - The New York State Reliability Council David Kiguel - Hydro One Networks, Ontario Peter Lebro - US National Grid Brian Hogue - NPCC Guy Zito - NPCC	X		
CenterPoint Energy	X		

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Transmission Control/Real Time Operations John Jonte Dennis Caufield			
TVA Kathy Davis Chuck Feagans James Regg Mitch Needham Bill Byrom Jerry Landers	X		R4 - Is it reasonable to assume that this can be delegated? TVA Transmission Operators do not develop operating limits
Elizabeth Howell International Transmission Company (ITC)	X		R3 What does "interconnected operating services" refer to? Assuming this refers to generation based ancillary services, normally the BA would make the arrangements, rather than the TOp directly.
John Horakh MAAC	X		
E. Nick Henery SMUD	X		Eliminate the reference to the Reliability Authority and replace with the Reliability Coordinator.
Edward C. Stein First Energy	X		

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

<p>General Response: Based on the comments received, industry consensus supports the elements of the Emergency Operations standard. Although this consensus has been obtained, there will be modification made to provide further clarifications to elements identified in comments.</p>			
Commenter	Yes	No	Comment
Gerald Rheault Manitoba Hydro	X		
Peter Burke [on behalf of ATC's Paul Steinberger, Bobbi Welch, Jason Shaver, Tim Beach, Bruce Teague]  American Transmission Co.		X	R5.1 requires the TO to monitor Balancing Authority ACE and respond to an ACE related emergency by ordering load shedding. The TO will order load shedding in response to line and equipment overloads, after consultation with the Reliability Authority, but has no need to monitor ACE.
<p>R5.1 does not require that a BA's ACE be monitored by the TOP. R5.1 requires that procedures and processes are developed to address situations when a BA is experiencing problems meeting their resource or load balancing requirements.</p>			
Southern Company- Transmission, Operations, Planning and EMS divisions Jim Griffith - Southern Steve Corbin - Southern Jim Viikinsalo - Southern Lisa Kelley - Mississippi Power Rex Johnson - Savannah Power Company Gary Gorham - Alabama Power Company	X		R5.2 and R5.3 - At the end of each requirement above add the following to the sentence: "consistent with applicable laws and/or regulations".

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<p>Billy Bush - Gulf Power Company                  Jeff Stansell - Georgia Power Company                  Matt Ansley - Southern                  Raymond Vice - Southern                  Mike Sanders - Southern                  Mike Oatts - Southern</p>			
<p>Anita Lee                  Alberta Electrical System Operator</p>			
<p>Linda Campbell - FRCC                  Mark Bennett - Gainesville Regional Utilities                  Steve Wallace - Seminole Electric Cooperative                  Steve McElhaney - Florida Municipal Power Agency                  Alan Gale - City of Tallahassee                  Ted Hobson - JEA                  Tom Washburn - Orlando Utilities Commission                  Tim Beyrle - Utilities Commission of New Smyrna Beach                  William Baldwin - Ft. Pierce Utilities Authority</p>		<p align="center">X</p>	<p>On the website, this document is labeled ORG-006-1 which fits with the previous standards. However, on the standard form itself, this one is identified by TOP-014-1. This does not seem to be correct and is confusing. We would suggest they all be ORG standards since they deal with organization certification.</p> <p>We are unclear what is required in R1.2. The statement in R1 indicates the requirement is to have a document that defines the conditions that are considered an emergency. R1.2 does not do that and refers to emergency conditions. This is circular and should be corrected or removed.</p> <p>R3 has the TOP directing the actions of Generator Operators and Distribution Providers. We believe the functional model has these tasks as a responsibility of the BA, not the TOP. This should be reviewed and clarified.</p> <p>R5.1 uses the word “Applicant” and we are not clear who that refers to. It would seem that the LSE is the entity to shed load, but applicant implies the entity going through certification. This requirement should be reviewed and reworded for clarity.</p> <p>Remove the words “on request” from M1.</p>

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			The words “during the certification process.” need to be added to the end of the sentence in D1.1.1 Also, add the word “demonstrate between shall and adhere.
<p>The numbering of the standards will be modified to reflect the current numbering convention of all standards.</p> <p>The standard has been modified to address the issues you raise.</p> <p>Although there is direction from the BA to these entities, there must also be the same process in place for Transmission Operator for issues related to transmission facility control. The Functional Model supports this under TOP real-time tasks #11 and #14.</p> <p>The standard has been modified to remove the word “applicant” and replaced with the entity under certification.</p> <p>M1 - The standard has been modified to address the issue you raise.</p> <p>The compliance sections of the standards have been reformatted.</p>			
Compliance and Certification Committee Bob Harbour - Continental Cooperative Services Ted Hobson - JEA Greg Campoli - NYISO Paul Arnold - BPA – WECC Chuck Waits - METC - ECAR			
Cinergy Corp Doug Hils Larry Conrad Walt Yeager	X		
Southern Company	X		R5.2 and R5.3 - At the end of each requirement above add the following to

**Transmission Operator Certification Standard – Posting 1 - Comments**

Roman Carter Tony Reed Joel Dison Terry Crawley Tom Higgins Roger Green Lucius Burris Lloyd Barnes			the sentence: “consistent with applicable laws and/or regulations”.
RTO/ISO Standards Review Committee Dale McMaster - AESO Ed Riley - CAISO Sam Jones - ERCOT Peter Henderson - IESO Peter Brandien - ISO-NE Bill Phillips - MISO Karl Tammar - NYISO Bruce Balmat - PJM Charles Yeung - SPP		X	1) Number is not correct: it should be ORG-006-1 2) M1 the measure should be to the Regional Reliability Organization (it has RRA) 3) requirement R3: It is suggested to add Transmission Owners and Load Serving Entities i.e. The revised R3 should read as follows: The TOP shall have procedures and processes to direct actions of Generator Operators(s), Transmission Owner(s), Load Serving entities and Distribution Provider(s) under an .....
The numbering of the standards will be modified to reflect the current numbering convention of all standards. The document has been modified based on your comment. Requirement R 3 is written in accordance with the entities specified in the Functional Model.			
Operating Reliability Working Group (ORWG) Southwest Power Pool Ron Ciesiel - SPP Darrell Cipriany - AEP Bob Cochran - SPS	X		Suggest changing "document" in the second sentence of Requirement R5 to "document(s)" to indicate the possibility of more than one document.

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Mike Gammon - KCPL Steve Hillman - WPEK Allen Klassen - Westar Bill Nolte - SECI Robert Rhodes - SPP Mike Stafford - GRDA			
Ed Riley California ISO		X	<p>1) Number is not correct: it should be ORG-006-1</p> <p>2) Measure1: The measure should be to the Regional Reliability Organization (it has RRA).</p> <p>3) Requirement R3: It is suggested to add Transmission Owners and Load Serving Entities i.e. The revised R3 should read as follows: The TOP shall have procedures and processes to direct actions of Generator Operators(s), Transmission Owner(s), Load Serving entities and Distribution Provider(s) under an .....</p>
<p>The numbering of the standards will be modified to reflect the current numbering convention of all standards. The document has been modified based on your comment. Requirement R 3 is written in accordance with the entities specified in the Functional Model.</p>			
Verne Ingersoll Progress Energy - Carolinas		X	
Alex Cabrera Southern California Edison			No comment
Michael C. Calimano NYISO		X	<p>Number TOP-014-1 needs to be changed to ORG-006-1</p> <p>M1 the measure should be changed to the Regional Reliability Organization instead of Regional Reliability Revise</p> <p>R3 to :The TOP shall have procedures and processes to direct actions of Generator Operator(sO, Transmission Owner(s), Load Serving Entities and Distribution Provider(s) under an .</p>

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<p>The numbering of the standards will be modified to reflect the current numbering convention of all standards.                  The document has been modified based on your comment.                  Requirement R 3 is written in accordance with the entities specified in the Functional Model.</p>			
Travis Besier or Ellis Rankin TXU Electric Delivery Co.	X		<p>TXU Electric Delivery agrees with the Emergency Operations standard but suggests a minor word change. The sentence labeled B.R2 should be changed to read:</p> <p>"The Transmission Operation shall have documented procedures or processes that define its responsibilities, authority and actions to be taken under anticipated or actual emergency conditions."</p> <p>The word "documented" should be added in a similar manner to the sentences labeled B.R3, B.R4 and B.R5.</p>
Kathleen Goodman ISO New England Inc	X		<p>Section C M1 refers to RRA? What is the entity this was intended to be?</p>
Jack Alvarez New York State Reliability Council	X		
P. D. Henderson IESO (Independent Electricity System Operator), Ontario		X	<p>1) re: section "Number" TOP-014-1 should be corrected to read "ORG-006-1"</p> <p>(2) section C M1 refers to Regional Reliability Authority (RRA). This term needs to be clarified and/or corrected, as applicable. Is the intent that this be a RRO?</p> <p>(3) re: requirement R3: It is suggested to add Transmission Owners and Load Serving Entities to the list. viz. The revised R3 should read as follows: The TOP shall have procedures and processes to direct actions of Generator Operators(s), Transmission Owner(s), Load Serving entities and Distribution Provider(s) under an ....</p>

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<p>The numbering of the standards will be modified to reflect the current numbering convention of all standards.                  The document has been modified based on your comment.                  Requirement R 3 is written in accordance with the entities specified in the Functional Model.</p>			
Kevin Conway GCPD		X	The TOP should have Agreements to work with other entities, not just policies and procedures. This information should be in the EOP section of the standards, and it may be duplicative of some of those standards.
<p>Standard ORG 010-1 Transmission Operator Certification – Agreements addresses EOP situations with the entities identified in the Functional Model.</p>			
Todd Johnson Salt River Project	X		
William J. Smith Allegheny Power	X		
Edward Davis Entergy Services, Inc		X	<p>Please define "emergency situations".</p> <p>Please change "Reliability Authority" to "Reliability Coordinator" in this standard.</p> <p>Requirements R3, R4, and R5 address terms and conditions that should be included in interconnection and operating agreements. Therefore these Requirements should be deleted from this standard and added to the Transmission Operator Certification - Agreements standard.</p> <p>R5.1 contains the term "Applicant". What entity should the Transmission Operator be "directing" in this section? There are no Applicants for these standards.</p> <p>Also, there is no "Regional Reliability Authority" as indicated in M1. Should those processes or procedures be made available to the Reliability</p>

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			Coordinator or the Regional Reliability Organization?
<p>Based on you comment, we capitalized “emergency” to reflect that it is defined in the NERC glossary.</p> <p>The standards will be modified to address you suggestion.</p> <p>The intent of ORG 010-1 – Agreements is to state which elements the TOP needs to address in the agreements. The intent of ORG 014-1 Emergency Operations is to address continued operations in the event of emergency operations.</p> <p>The document has been modified based on your comment.</p> <p>M1 has been modified.</p>			
NPCC CP9, Reliability Standards Working Group Ralph Rufano - New York Power Authority Kathleen Goodman - ISO-New England Bob Pelligrini - United Illuminating Khaqan Khan - The IESO Greg Campoli - New York ISO Al Adamson - The New York State Reliability Council David Kiguel - Hydro One Networks, Ontario Peter Lebro - US National Grid Brian Hogue - NPCC Guy Zito - NPCC	X		Section C M1 refers to RRA? What is the entity this was intended to be?
CenterPoint Energy Transmission Control/Real	X		

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Time Operations John Jonte Dennis Caufield			
TVA Kathy Davis Chuck Feagans James Regg Mitch Needham Bill Byrom Jerry Landers	X		M1- "Regional Reliability Authority" is a new term and its not clear as to what it is .
Elizabeth Howell International Transmission Company (ITC)	X		R1 Addresses 3 requirements to define an emergency condition, but R1.2 is "When the TOp is experiencing actual emergency conditions". This seems rather circular.
John Horakh MAAC	X		
E. Nick Henery SMUD			Eliminate the reference to the Reliability Authority and replace with the Reliability Coordinator.
Edward C. Stein First Energy	X		

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

General Response: Based on the comments received, industry consensus supports the elements of the Loss of Control Center Functionality standard. Although this consensus has been obtained, there will be modification made to provide further clarifications to elements identified in comments received.

Commenter	Yes	No	Comment
Gerald Rheault Manitoba Hydro	X		Manitoba Hydro agrees with the requirement for this standard. However there may be instances in back up mode where the entity will not be able to accomplish all the activities associated in R2. Therefore the standard should identify which items in R2 are musts and which can be suspended during the time the Control Center cannot operate.
Peter Burke [on behalf of ATC's Paul Steinberger, Bobbi Welch, Jason Shaver, Tim Beach, Bruce Teague]  American Transmission Co.		X	R2.8 makes the same reference to "arranging" for "interconnected operations service" for voltage support that was made in Standard ORG-005, "System Analysis," Part B R3. Please define what is meant by the terms "arrange" and "interconnected operations service." If the words "arrange" and "interconnected operations service" are intended to incorporate the concept of procurement and payment, the TO may not have the ability to purchase such services, under some circumstances. In ATC's situation, the TO, in concert with the Reliability Authority, can determine the required amount and location of reactive resources; but can then only request its Balancing Authorities to provide these resources. Payment for the provision of reactive services is "arranged" by the Transmission Provider (as opposed to the Transmission Operator).
The standard has been modified to address your concern and clarify the requirement.			
Southern Company- Transmission, Operations, Planning and EMS divisions Jim Griffith - Southern Steve Corbin - Southern Jim Viikinsalo - Southern Lisa Kelley - Mississippi Power		X	Section A.3: -Transmission Operators must plan for continued operations in the event of the loss of its control center facilities.- We assume this means loss of some of its control center facilities, or loss of its main facility. But it's not very clear. It sounds like the purpose of this standard might be to mandate backup control centers and systems, but it doesn't really say that.  Section B.R1:.....such that it can continue to operate in accordance with NERC standards....; this is a pretty broad statement - We hope/assume -in accordance with NERC standards- means the same thing to everybody, but

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<p>Rex Johnson - Savannah Power Company  Gary Gorham - Alabama Power Company  Billy Bush - Gulf Power Company  Jeff Stansell - Georgia Power Company  Matt Ansley - Southern  Raymond Vice - Southern  Mike Sanders - Southern  Mike Oatts - Southern</p>			<p>we don't know what all that would include. It sounds pretty open-ended to us. The rest of R1 makes sense.</p> <p>Section B.R2: This is where it really get confusing. We thought we just had to explain in R1 above how we would operate without all this stuff; now we're asked to explain how we're going to have/do all this stuff anyway. If the intent overall is to require backup facilities, sites, systems, personnel, tools, communications, etc. and to explain how they can be used, it would make more sense to go ahead and say so by using words like -primary- to refer to what you have to plan to lose and -backup- for what you have to plan to use.</p> <p>Section D.3: With no levels of non-compliance given, it has to be very clear what's expected. Is anything less than a hot-standby control center non-compliant? If not, how long is acceptable for it to take after a main facility event to -swap over-? A week? One day? One hour? How geographically close can this backup capability be? If the intent is to require real-time backup control center capability then why not just say so? If that is not the intent, than what is?</p>
<p>This standard is based on the TOP SAR – Emergency Operations section 6.3. The SAR and this standard make no requirements for back-up control centers. The intent of the requirements is that the entity is prepared to be able to handle the single loss of the identified conditions. Even though a back-up control center may be one method to satisfy the requirements, there may be other methods that an entity may use and plan for to continue reliable operations.</p> <p>As stated in requirement R1, this must be done in accordance with NERC Standards. At this time, EOP-008-0 identifies the criteria in question.</p>			
<p>Anita Lee   Alberta Electrical System Operator</p>			
<p>Linda Campbell - FRCC  Mark Bennett - Gainesville Regional Utilities  Steve Wallace - Seminole Electric Cooperative</p>		<p align="center">X</p>	<p>The words in R1 are not clear of what the intent is. We would suggest rewording it to the following: “The Transmission Operator shall have procedures, processes, or facilities such that it can continue to operate in accordance with NERC reliability standards upon the loss of control center facilities. These procedures, processes or facilities shall include the following conditions:” Then list R1.1 – R1.5 as bullets. They are not</p>

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<p>Steve McElhaney - Florida Municipal Power Agency Alan Gale - City of Tallahassee Ted Hobson - JEA Tom Washburn - Orlando Utilities Commission Tim Beyrle - Utilities Commission of New Smyrna Beach William Baldwin - Ft. Pierce Utilities Authority</p>			<p>actually requirements.</p> <p>For R2 we would suggest a rewrite for clarity as follows: “For each condition identified in R1, the Transmission Operator shall have procedures, processes or tools that address the following:”</p> <p>M1 seems to only address documentation, while the requirements mention tools, processes etc. Shouldn’t demonstration be a part of this measure?</p> <p>The words “during the certification process.” need to be added to the end of the sentence in D1.1.1 Also, add the word “demonstrate between shall and adhere.</p>
<p>The standard has been reformatted and modified.</p> <p>M1 has been modified.</p> <p>All of these standards are meant to be “during the certification process”.</p> <p>The Compliance section has been reformatted and should address your concern.</p>			
<p>Compliance and Certification Committee Bob Harbour - Continental Cooperative Services Ted Hobson - JEA Greg Campoli - NYISO Paul Arnold - BPA – WECC Chuck Waits - METC - ECAR</p>			
<p>Cinergy Corp Doug Hils Larry Conrad</p>	<p align="center">X</p>		

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Walt Yeager			
Southern Company Roman Carter Tony Reed Joel Dison Terry Crawley Tom Higgins Roger Green Lucius Burris Lloyd Barnes		X	This draft does not require the TOP to notify any Generator Operators. In the event of loss of control center facilities, it is important that the TOP notify the Generator Operators of any nuclear power plant, or better, all Generator Operators with an agreement with the TOP so they can assess the impacts to their plants. In particular for Nuclear, it may be necessary for them to take certain actions such as restore safe shutdown equipment to operable status, place the plant into a safe condition, etc.. This is a good example of why agreements are needed between the nuclear power plant and the TOP.
Communications will take place in accordance with the protocols established in the agreements and procedures.			
RTO/ISO Standards Review Committee Dale McMaster - AESO Ed Riley - CAISO Sam Jones - ERCOT Peter Henderson - IESO Peter Brandien - ISO-NE Bill Phillips - MISO Karl Tammar - NYISO Bruce Balmat - PJM Charles Yeung - SPP	X		The existing ver-0 NERC standard (re:EOP-008-0 ) prescribes a requirement that clearly outlines that the interim provisions must be included if it is expected to take more than one hour to implement the contingency plan for loss of primary control facility. It is recommended to include this existing clause/requirement into the proposed ver-1 std re: ORG-007-1.
Operating Reliability Working Group (ORWG) Southwest Power Pool Ron Ciesiel - SPP Darrell Cipriany - AEP Bob Cochran - SPS	X		We would suggest that Requirement R1.2 should be modified to read "Loss of primary communications."

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Mike Gammon - KCPL Steve Hillman - WPEK Allen Klassen - Westar Bill Nolte - SECI Robert Rhodes - SPP Mike Stafford - GRDA			
Ed Riley California ISO	X		The existing ver-0 NERC standard (re:EOP-008-0 ) prescribes a requirement that clearly outlines that the interim provisions must be included if it is expected to take more than one hour to implement the contingency plan for loss of primary control facility. It is recommended to include this existing clause/requirement into the proposed ver-1 std re: ORG-007-1.
Verne Ingersoll Progress Energy - Carolinas		X	
Alex Cabrera Southern California Edison			No comment
Michael C. Calimano NYISO	X		
Travis Besier or Ellis Rankin TXU Electric Delivery Co.		X	R1.2 The condition described as loss of all communications except that associated with SCADA data is not very realistic. Much of the SCADA communication network is mixed with public and private carriers that also provide voice, internet, and data services. Typically, it is not realistic that one part of the network would be lost and the other would continue to function.  B.R1 Insert "documented" before the word "procedures." Make the same change for B.R2.
<p>The Certification Standard Drafting Team feels that loss of all communications except that associated with SCADA is very realistic and has happened.</p> <p>The intent of the term procedure is that it is documented.</p>			

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Kathleen Goodman ISO New England Inc	X		
Jack Alvarez New York State Reliability Council	X		
P. D. Henderson IESO (Independent Electricity System Operator), Ontario		X	<p>1) The existing ver-0 NERC standard (re:EOP-008-0 ) prescribes a requirement that clearly outlines that the interim provisions must be included if it is expected to take more than one hour to implement the contingency plan for loss of primary control facility. It is recommended to include the existing clause/requirement into this proposed ver-1 std re: ORG-007-1.</p> <p>2) A new requirement R1.6 should be added to have the procedures &amp; processes in place in the event of infectious diseases such as SARS ,</p>
<p>The standard has been modified to reflect this reference.</p> <p>You raise a very interesting issue and the SDT believes that this would be covered under R1.1.</p>			
Kevin Conway GCPD		X	Once again I find this duplicative with the standards already in place.
<p>As stated previously, there may be instances where the standards could be construed as duplicated, but the Certification Standards are intended to be a one-time measurement of an entity's capability to perform their registered functions. Other reliability standards cover elements of on-going operations.</p>			
Todd Johnson Salt River Project	X		
William J. Smith Allegheny Power	X		Requirement R1 does not specify the conditions under which the Transmission Operator is expected to continue to operate. Does "Loss of" refer to the loss of Primary Facilities or Primary and Back-up Facilities as well.
Edward Davis		X	Please change "Reliability Authority" to "Reliability Coordinator" in this

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Entergy Services, Inc			standard.
The standard will be modified based on your comments.			
NPCC CP9, Reliability Standards Working Group Ralph Rufano - New York Power Authority Kathleen Goodman - ISO-New England Bob Pelligrini - United Illuminating Khaqan Khan - The IESO Greg Campoli - New York ISO Al Adamson - The New York State Reliability Council David Kiguel - Hydro One Networks, Ontario Peter Lebro - US National Grid Brian Hogue - NPCC Guy Zito - NPCC	X		
CenterPoint Energy Transmission Control/Real Time Operations John Jonte Dennis Caufield	X		
TVA Kathy Davis Chuck Feagans James Regg	X		

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Mitch Needham Bill Byrom Jerry Landers			
Elizabeth Howell International Transmission Company (ITC)	X		
John Horakh MAAC	X		
E. Nick Henery SMUD	X		Eliminate the reference to the Reliability Authority and replace with the Reliability Coordinator. The requirements to shed load and who communicates with the Load Serving Entity will need to be reexamined.
Edward C. Stein First Energy	X		The Drafting Team needs to clarify the requirements so that there is little or no room for interpretation. As I read this standard, one could conclude that the only way to comply with this standard is to provide an independent fully functional backup control center with its own communication system. Monitoring and assessment systems in R1.3 could be defined as the equipment from the RTU to the state estimator, on-line load flow and contingency analysis.

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

General Comment: In general, those individuals who provided comments support the Introduction, Requirements, Measures, and Compliance elements of the standard. Minor changes have been made based on suggestions from the industry and will be available for comment in the next posting.

Commenter	Yes	No	Comment
Gerald Rheault Manitoba Hydro	X		
Peter Burke [on behalf of ATC's Paul Steinberger, Bobbi Welch, Jason Shaver, Tim Beach, Bruce Teague]  American Transmission Co.	X		
Southern Company- Transmission, Operations, Planning and EMS divisions Jim Griffith - Southern Steve Corbin - Southern Jim Viikinsalo - Southern Lisa Kelley - Mississippi Power Rex Johnson - Savannah Power Company Gary Gorham - Alabama Power Company Billy Bush - Gulf Power Company Jeff Stansell - Georgia Power	X		

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<p>Company                  Matt Ansley - Southern                  Raymond Vice - Southern                  Mike Sanders - Southern                  Mike Oatts - Southern</p>			
<p>Anita Lee                   Alberta Electrical System                  Operator</p>			
<p>Linda Campbell - FRCC                  Mark Bennett - Gainesville                  Regional Utilities                  Steve Wallace - Seminole                  Electric Cooperative                  Steve McElhaney - Florida                  Municipal Power Agency                  Alan Gale - City of                  Tallahassee                  Ted Hobson - JEA                  Tom Washburn - Orlando                  Utilities Commission                  Tim Beyrle - Utilities                  Commission of New Smyrna                  Beach                  William Baldwin - Ft. Pierce                  Utilities Authority</p>		<p align="center">X</p>	<p>A definition of “Agreements” was included on page 2. We note that there is already a definition of “Agreement” in the glossary of terms developed with V0 reliability standards. We do however, believe the definition you have supplied is better and that it should replace the one in the glossary.</p> <p>On the website, this document is labeled ORG-008-1 which fits with the previous standards. However, on the standard form itself, this one is identified by TOP-016-1. This does not seem to be correct and is confusing. We would suggest they all be ORG standards since they deal with organization certification.</p> <p>The measure M1 does not seem to really be a measure, but more of how it is monitored. We would suggest that M1 be changed to “The Transmission Operator’s Restoration Plan shall include all of the items identified in R1.”</p> <p>D1.1.1 should be changed to “The Transmission Operator shall provide its Restoration Plan for review during the certification process.”</p>

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If a definition is changed by the approval of a standard, the new definition would replace the previously defined term. The SDT, however, must ensure that the new definition does not change the intent of the previous definition with regards to the standards that it was used for.

The numbering of the standards will be modified to reflect the current numbering convention of all standards.

The intent of the measure is to show how a review team will determine compliance. Inspecting the document is how compliance will be measured.

The reformatting of section D will correct this issue.

Compliance and Certification Committee Bob Harbour - Continental Cooperative Services Ted Hobson - JEA Greg Campoli - NYISO Paul Arnold - BPA – WECC Chuck Waits - METC - ECAR			
Cinergy Corp Doug Hils Larry Conrad Walt Yeager	X		
Southern Company Roman Carter Tony Reed Joel Dison Terry Crawley Tom Higgins Roger Green	X		

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Lucius Burris Lloyd Barnes			
RTO/ISO Standards Review Committee Dale McMaster - AESO Ed Riley - CAISO Sam Jones - ERCOT Peter Henderson - IESO Peter Brandien - ISO-NE Bill Phillips - MISO Karl Tammar - NYISO Bruce Balmat - PJM Charles Yeung - SPP	X		Number is not correct: it should be ORG-008-1
Operating Reliability Working Group (ORWG) Southwest Power Pool Ron Ciesiel - SPP Darrell Cipriany - AEP Bob Cochran - SPS Mike Gammon - KCPL Steve Hillman - WPEK Allen Klassen - Westar Bill Nolte - SECI Robert Rhodes - SPP Mike Stafford - GRDA	X		
Ed Riley California ISO	X		Number is not correct: it should be ORG-008-1
Verne Ingersoll		X	

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Progress Energy - Carolinas			
Alex Cabrera Southern California Edison			No comment
Michael C. Calimano NYISO	X		Number TOP-016-1 should br OEG-008-1
Travis Besier or Ellis Rankin TXU Electric Delivery Co.	X		TXU Electric Delivery agrees with the Restoration standard, but suggests a minor word change.  The sentence labeled B.R1 should be changed to read:"The Transmission Operator shall have a documented plan that defines its responsibilities, authority, and actions in responding, communicating status, and coordinating with the Reliability Authority, Balancing Authority(ies), Generator Operators, Distribution Providers, and adjacent Transmission Operators following a partial or total system shutdown."
Kathleen Goodman ISO New England Inc		X	Security and confidentiality of data needs to be incorporated into the standard.
Standard ORG-002-1 Transmission Operator Certification – Agreements Requirement 1 requires the TOP to have an executed copy of the NERC Confidentiality Agreement.			
Jack Alvarez  New York State Reliability Council	X		
P. D. Henderson IESO (Independent Electricity System Operator), Ontario	X		1) re: section "Number" TOP-016-1 should be corrected to read "ORG-008-1"  2) re: Section B Requirements R2...Security and confidentiality of data needs to be incorporated into the standard. Accordingly, it is suggested that the existing statement “Transmission Operator shall provide its restoration plan to its Reliability Authority” should be qualified with the revised statement as follows: “.....shall make available upon request subject to confidentiality and non disclosure arrangements to ensure physical security

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			of the assets...” 3) re: Section R1 Functional Model defined entities (such as Distribution Provider, RA, etc....) should be clearly defined and certified before the implementation of this certification standard.
Kevin Conway GCPD		X	Once again I find this duplicative with the standards already in place.
There may be instances where the standards could be construed as duplicated, but the Certification Standards are intended to be a one-time measurement of an entity’s capability to perform their registered functions. Other reliability standards cover elements of on-going operations.			
Todd Johnson Salt River Project	X		
William J. Smith Allegheny Power	X		
Edward Davis Entergy Services, Inc		X	Please change "Reliability Authority" to "Reliability Coordinator" in this standard.
The standard will be modified based on your comments.			
NPCC CP9, Reliability Standards Working Group Ralph Rufano - New York Power Authority Kathleen Goodman - ISO-New England Bob Pelligrini - United Illuminating Khaqan Khan - The IESO Greg Campoli - New York ISO		X	Security and confidentiality of data needs to be incorporated into the standard.

**Transmission Operator Certification Standard – Posting 1 - Comments**

Al Adamson - The New York State Reliability Council David Kiguel - Hydro One Networks, Ontario Peter Lebro - US National Grid Brian Hogue - NPCC Guy Zito - NPCC			
Standard ORG-002-1 Transmission Operator Certification – Agreements Requirement 1 requires the TOP to have an executed copy of the NERC Confidentiality Agreement.			
CenterPoint Energy Transmission Control/Real Time Operations John Jonte Dennis Caufield	X		
TVA Kathy Davis Chuck Feagans James Regg Mitch Needham Bill Byrom Jerry Landers	X		
Elizabeth Howell International Transmission Company (ITC)	X		
John Horakh MAAC	X		
E. Nick Henery SMUD	X		Eliminate the reference to the Reliability Authority and replace with the Reliability Coordinator.
Edward C. Stein	X		

Transmission Operator Certification Standard – Posting 1 - Comments

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

Commenter	Comment
Gerald Rheault Manitoba Hydro	
Peter Burke [on behalf of ATC's Paul Steinberger, Bobbi Welch, Jason Shaver, Tim Beach, Bruce Teague]  American Transmission Co.	These standards need to be reviewed in conjunction with the CCC requirements for certification. Without that information, it is difficult to comment on what may be missing. ATC needs to review the BA, RA certification to verify that reciprocal obligations are being required. ATC is aware that the SARs have not been posted for Generator Owner, Generator Operator, Planning Authority, Distribution Provider, and Transmission Service Provider certifications. If these entities are not required to be certified, they would have no incentive to consummate an agreement with a Transmission Operator.
The process for certification administration is being developed by the CCC. Although it is hopeful that those procedures will be developed shortly, the criteria for certifying an entity can be evaluated without them. The Drafting Team's intent is to next post the BA and TOP together for industry comment and then at some future time, post the BA, RA, and TOP together. The Drafting Team is very aware of not wanting to overburden the industry in commenting to an overabundance of standards simultaneously. Entities will have to ensure that they have the appropriate agreements in place. If the other entities that you mention wish to do business with these entities and within these entities' areas of responsibilities, they will be required to enter into such agreements as an elements of having a business arrangement.	
Southern Company- Transmission, Operations, Planning and EMS divisions Jim Griffith - Southern Steve Corbin - Southern Jim Viikinsalo - Southern Lisa Kelley - Mississippi Power Rex Johnson - Savannah Power Company Gary Gorham - Alabama Power Company	

**Transmission Operator Certification Standard – Posting 1 - Comments**

<p>Billy Bush - Gulf Power Company                  Jeff Stansell - Georgia Power Company                  Matt Ansley - Southern                  Raymond Vice - Southern                  Mike Sanders - Southern                  Mike Oatts - Southern</p>	
<p>Anita Lee                  Alberta Electrical System Operator</p>	<p>We recommend that when an Entity has identified short comings in meeting this certification standard, and provide an action plan to correct the short comings within a reasonable time period, then consideration should be given that the Entity may be granted a temporary certification. A permanent certification will be granted when the action plan is completed within the specified time period and the Entity meets the certification standard. Otherwise the temporary certification may be revoked.</p>
<p>The intent of the Certification Standards is that the entity seeking certification must meet all of the criteria or certification will not be awarded.</p>	
<p>Linda Campbell - FRCC                  Mark Bennett - Gainesville Regional Utilities                  Steve Wallace - Seminole Electric Cooperative                  Steve McElhaney - Florida Municipal Power Agency                  Alan Gale - City of Tallahassee                  Ted Hobson - JEA                  Tom Washburn - Orlando Utilities Commission                  Tim Beyrle - Utilities Commission of New Smyrna Beach</p>	<p>This is not a comment on missing elements, but a question that came to mind in reviewing this draft standard and thinking about readiness audits. When these certification standards are approved and implemented, will the need for readiness audits go away? It would seem that a certification audit and readiness audit are very similar. It would be very burdensome to the industry (both Auditors and Auditees) to have compliance audits, readiness audits and certification audits. If the readiness audits actually go a little further in ensuring that tools and processes work, perhaps the certification could be expanded a bit to cover that too. We think to have both may be duplicative and unnecessary and ask this question as we are not sure that anyone has been thinking about this. Also, it has been consistently stated by the drafting team, that this standard is only for initial certification. We support that and do not believe this level of review and evidence is required on a periodic basis. The reliability standards identify the requirements that at TOP (or BA, RA etc) need to comply with. The monitoring of compliance to the reliability standards should provide the evidence and do away with a need for any “re-certification”. Perhaps the only time a re-certification would be justified would be in the event of an egregious violation, or continuing violations of the reliability standards.</p>

**Transmission Operator Certification Standard – Posting 1 - Comments**

William Baldwin - Ft. Pierce Utilities Authority	
The Certification Process is a one-time event to evaluate an entity's capability to address their responsibilities. Certification, Compliance Programs, and Readiness Audits all have specific objectives for their processes. As far as the status of Readiness Audits after the Certification Standards are approved, adopted, and implemented, that will be at the discretion of the NERC office, the industry, and the NERC BOT and beyond the scope of the Drafting Team.	
Compliance and Certification Committee Bob Harbour - Continental Cooperative Services Ted Hobson - JEA Greg Campoli - NYISO Paul Arnold - BPA – WECC Chuck Waits - METC - ECAR	
Cinergy Corp Doug Hils Larry Conrad Walt Yeager	
Southern Company Roman Carter Tony Reed Joel Dison Terry Crawley Tom Higgins Roger Green Lucius Burris Lloyd Barnes	
RTO/ISO Standards Review	1) Separate compliance elements for this certification standard does not work. There is one

**Transmission Operator Certification Standard – Posting 1 - Comments**

<p>Committee  Dale McMaster - AESO  Ed Riley - CAISO  Sam Jones - ERCOT  Peter Henderson - IESO  Peter Brandien - ISO-NE  Bill Phillips - MISO  Karl Tammar - NYISO  Bruce Balmat - PJM  Charles Yeung - SPP</p>	<p>compliance check (standard ORG-001-1) for the entire collection of certification standards. Certification is only achieved with ORG-001-1.</p> <p>2) The standard should include some discussion concerning what happens if an entity does not meet one of the ORG standards. How long does it have to correct the short-comings. Once it is compliant with one of these standards does the entity retain that compliance level forever? Need to add something like, if the entity fails to complete ORG-001-1 within one year, compliance with the other )RG-002 through 007 are revoked</p> <p>3) Presently, there are various requirements outlined for meeting objectives of Transmission Operator Certifications and/or Registration process. These pertain to (i) TOP FM Certification - tasks/responsibilities (ii) Ver 1-TOP Certification Standards and (iii) Ver 0 TOP Registration requirements. Various issues related to ver-0 registration process and FM area also being reviewed. It is recommended that the proposed ver-1 TOP Certification Standards should be thoroughly reviewed and re-assessed by SDT based on the outcomes/resolutions of existing registration and any FM updates/revisions.</p> <p>4) TOP certification standards: Although the measures pertaining to requirements are specified in these standards yet the compliance related requirements and/or levels of non-compliance are not specified. For the purposes of effective implementation/enforcement of these standards, we recommend that the associated compliance monitoring process and levels of non compliance should also be specified.</p> <p>5) The requirement to have procedures, processes or coordination mechanisms in place with other Functional Model related entities should need to allow for a transition period since the FM related entities are not yet certified. Moreover, these entities ((such as RA, BA, GOP, LSE, DP, etc..) be clearly defined and certified before the implementation of this certification standard..</p>
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**Transmission Operator Certification Standard – Posting 1 - Comments**

	<ol style="list-style-type: none"> <li>1) Requirement R5 as identified in ORG-001-1 includes adherence to all of the other certification standards.</li> <li>2) The elements that you identify are part of the Certification Administration Procedures that are being developed by the CCC and your comments will be forwarded to them for consideration.</li> <li>3) The intent of the Drafting Team is that as the Functional Model is revised, those revisions will be incorporated into the Certification Standards as applicable. It is anticipated that this will occur prior to the standards going to ballot, in which case, the Team will incorporate and seek industry affirmation of the changes.</li> <li>4) The Certification Standards are unique in that they differ from the other standards. They are intended to have a one-time use for an entity and are also unique in that you must satisfy all of the requirements or certification will not be awarded. Because of this uniqueness, levels of compliance are not appropriate.</li> <li>5) A transition plan for the implementation of these Certification Standards along with the registration of entities must be established. Your concern will be forwarded to the NERC Office.</li> </ol>
<p>Operating Reliability Working Group (ORWG)</p> <p>Southwest Power Pool</p> <p>Ron Ciesiel - SPP</p> <p>Darrell Cipriany - AEP</p> <p>Bob Cochran - SPS</p> <p>Mike Gammon - KCPL</p> <p>Steve Hillman - WPEK</p> <p>Allen Klassen - Westar</p> <p>Bill Nolte - SECI</p> <p>Robert Rhodes - SPP</p> <p>Mike Stafford - GRDA</p>	
<p>Ed Riley</p> <p>California ISO</p>	<ol style="list-style-type: none"> <li>1) Separate compliance elements for this certification standard does not work. There is one compliance check (standard ORG-001-1) for the entire collection of certification standards. Certification is only achieved with ORG-001-1.</li> <li>2) The standard should include some discussion concerning what happens if an entity does not meet one of the ORG standards. How long does it have to correct the short-comings. Once it is compliant with one of these standards does the entity retain that compliance level forever? Need to add something like, if the entity fails to complete ORG-001-1 within one</li> </ol>

**Transmission Operator Certification Standard – Posting 1 - Comments**

	<p>year, compliance with the other )RG-002 through 007 are revoked</p> <p>3) Presently, there are various requirements outlined for meeting objectives of Transmission Operator Certifications and/or Registration process. These pertain to (i) TOP FM Certification - tasks/responsibilities (ii) Ver 1-TOP Certification Standards and (iii) Ver 0 TOP Registration requirements. Various issues related to ver-0 registration process and FM area also being reviewed. It is recommended that the proposed ver-1 TOP Certification Standards should be thoroughly reviewed and re-assessed by SDT based on the outcomes/resolutions of existing registration and any FM updates/revisions.</p> <p>4) TOP certification standards: Although the measures pertaining to requirements are specified in these standards yet the compliance related requirements and/or levels of non-compliance are not specified. For the purposes of effective implementation/enforcement of these standards, we recommend that the associated compliance monitoring process and levels of non compliance should also be specified.</p> <p>5) The requirement to have procedures, processes or coordination mechanisms in place with other Functional Model related entities should need to allow for a transition period since the FM related entities are not yet certified. Moreover, these entities ((such as RA, BA, GOP, LSE, DP, etc..)) be clearly defined and certified before the implementation of this certification standard..</p>
	<ol style="list-style-type: none"> <li>1) Requirement R5 as identified in ORG-001-1 includes adherence to all of the other certification standards.</li> <li>2) The elements that you identify are part of the Certification Administration Procedures that are being developed by the CCC and your comments will be forwarded to them for consideration.</li> <li>3) The intent of the Drafting Team is that as the Functional Model is revised, those revisions will be incorporated into the Certification Standards as applicable. It is anticipated that this will occur prior to the standards going to ballot, in which case, the Team will incorporate and seek industry affirmation of the changes.</li> <li>4) The Certification Standards are unique in that they differ from the other standards. They are intended to have a one-time use for an entity and are also unique in that you must satisfy all of the requirements or certification will not be awarded. Because of this uniqueness, levels of compliance are not appropriate.</li> <li>5) A transition plan for the implementation of these Certification Standards along with the registration of entities must be established. Your concern will be forwarded to the NERC Office.</li> </ol>
<p>Verne Ingersoll Progress Energy - Carolinas</p>	<p>Progress Energy strongly objected to the use of the undefined term Reliability Coordinantor in the Version 0 standards. However, NERC chose to use the term rather than the term Reliability Authority which is defined in the functional model. NERC has also decided not to register any entities as Reliability Authorities. NERC cannot now implement a standard that</p>

**Transmission Operator Certification Standard – Posting 1 - Comments**

	<p>uses the term Reliability Authority. The proposed Certification Standard references Reliability Authority in numerous requirements. These references must be corrected to be consistent with the Version 0 Reliability Standards. In addition, no entity could comply with the standard since there are not any registered Reliability Authorities. The proposed Certification standards fail to address the threshold requirement, which is that an entity must actually operate interconnected transmission facilities. On the other hand, the proposed standards duplicate many requirements contained in the Version 0 Reliability Standards, overstate the minimum requirements for a Transmission Operator Organization and creates requirements in addition to those contained in the Version 0 standards. Is it the intent of this standard that an entity would first operate as an uncertified TO and later become certified as it puts in place all of the necessary procedures and systems?? As currently written, it appears virtually impossible for any entity not already acting as a Transmssion Operator to become certified.</p>
<p>Modifications have been made to the standards to reflect your concern. As far as duplication of standards, there may be instances where the standards could be construed as duplicated, but the Certification Standards are intended to be a one-time measurement of an entity’s capability to perform their registered functions. Other reliability standards cover elements of on-going operations. To be a certified TOP, you must meet all of the requirements contained in the Certification Standards, however, an entity may delegate tasks to be performed by other entities.</p>	
<p>Alex Cabrera Southern California Edison</p>	<p>See SCE’s response to question 3, the Agreements standard.</p>
<p>The comment was responded to in question 3.</p>	
<p>Michael C. Calimano NYISO</p>	<p>The standard should include some discussion concerning what happens if an entity does not meet one of the ORG standards. How long does it have to correct the short-comings? Once it is compliant with one of these standards does the entity retain that compliance level forever?</p>
<p>The intent of the Certification Standards is that the entity seeking certification must meet all of the criteria or certification will not be awarded. The issues that you raise would be covered by the administrative procedure which is the responsibility of the NERC CCC. The Certification Standards do not contain on-going compliance elements. Elements that are measured in an on-going basis will be covered through other standards.</p>	
<p>Travis Besier or Ellis Rankin TXU Electric Delivery Co.</p>	

**Transmission Operator Certification Standard – Posting 1 - Comments**

<p>Kathleen Goodman  ISO New England Inc</p>	<p>There presently has been no test developed to certify Transmission Operator.</p> <p>ISO-NE also recommends that the proposed version 1 TOP Stds. be thoroughly reviewed and reassessed by the SDT based on the outcomes and resolutions of existing registration and any FM updates and revisions. TOP certification stds: ORG-006/007/008: Although the measures pertaining to requirements are specified in these standards, the compliance related requirements and/or levels of non-compliance are not specified. For the purposes of effective implementation/enforcement of these standards, we recommend that the associated compliance monitoring process and levels of non compliance should be simultaneously specified.</p>
<p>There are several credentials that personnel can obtain. The NERC System Operator Certification Program does have a Transmission Operator credential.</p> <p>The intent of the Drafting Team is that as the Functional Model is revised, those revisions will be incorporated into the Certification Standards as applicable. It is anticipated that this will occur prior to the standards going to ballot, in which case, the Team will incorporate and seek industry affirmation of the changes.</p> <p>The Certification Standards are unique in that they differ from the other standards. They are intended to have a one-time use for an entity and are also unique in that you must satisfy all of the requirements or certification will not be awarded. Because of this uniqueness, levels of compliance are not appropriate.</p>	
<p>Jack Alvarez  New York State Reliability Council</p>	<p>As a general comment, none of the certification forms express the timeframe for re-examining compliance with certification nor is there any of the compliance elements filled in.</p>
<p>The Certification Standards are unique in that they differ from the other standards. They are intended to have a one-time use for an entity and are also unique in that you must satisfy all of the requirements or certification will not be awarded. Because of this uniqueness, levels of compliance are not appropriate.</p>	
<p>P. D. Henderson IESO (Independent Electricity System Operator), Ontario</p>	<p>1) Presently, there are various requirements outlined for meeting objectives for Transmission Operator Certifications and/or registration. These pertain to (i) TOP FM Certification - tasks/responsibilities (ii) Ver 1-TOP Certification Standards and (iii) Ver 0 TOP Registration requirements. Various issues related to ver-0 registration process and FM area also being reviewed. Issues such as allowing the registration of multiple entities as TOPs for the same transmission system will result in a complexities in the compliance monitoring and enforcement process.</p>

## Transmission Operator Certification Standard – Posting 1 - Comments

	<p>It is recommended that the proposed ver-1 TOP Certification Standards should be thoroughly reviewed and re-assessed by SDT based on the outcomes/resolutions of existing registration and any FM updates/revisions.</p> <p>2) Separate compliance elements for this certification standard does not work. There is one compliance check (standard ORG-001-1) for the entire collection of certification standards. Certification is only achieved with ORG-001-1.</p> <p>3) The standard should include some discussion concerning what happens if an entity does not meet one of the ORG standards. How long does it have to correct the short-comings. Once it is compliant with one of these standards does the entity retain that compliance level forever? Need to add something like, if the entity fails to complete ORG-001-1 within one year, compliance with the other )RG-002 through 007 are revoked.</p> <p>4) Although the measures pertaining to requirements are specified in these standards, yet the compliance related requirements and/or levels of non-compliance are not specified. For the purposes of effective implementation/enforcement of these standards, we recommend that the associated compliance monitoring process and levels of non compliance should also be specified.</p> <p>5) The requirement to have procedures, processes or coordination mechanisms in place with other Functional Model related entities should need to allow for a transition period since the FM related entities are not yet certified. Moreover, these entities ((such as RA, BA, GOP, LSE, DP, etc..) be clearly defined and certified before the implementation of this certification standard.</p>
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**Transmission Operator Certification Standard – Posting 1 - Comments**

<ol style="list-style-type: none"> <li>1) The intent of the Drafting Team is that as the Functional Model is revised, those revisions will be incorporated into the Certification Standards as applicable. It is anticipated that this will occur prior to the standards going to ballot, in which case, the Team will incorporate and seek industry affirmation of the changes.</li> <li>2) Requirement R5 as identified in ORG-001-1 includes adherence to all of the other certification standards.</li> <li>3) The intent of the Certification Standards is that the entity seeking certification must meet all of the criteria or certification will not be awarded. The issues that you raise would be covered by the administrative procedure which is the responsibility of the NERC CCC. The Certification Standards do not contain on-going compliance elements. Elements that are measured in an on-going basis will be covered through other standards.</li> <li>4) The Certification Standards are unique in that they differ from the other standards. They are intended to have a one-time use for an entity and are also unique in that you must satisfy all of the requirements or certification will not be awarded. Because of this uniqueness, levels of compliance are not appropriate.</li> <li>5) A transition plan for the implementation of these Certification Standards along with the registration of entities must be established. Your concern will be forwarded to the NERC Office.</li> </ol>	
Kevin Conway GCPD	Reliability Authority has been used repeatedly. As I understand the issues, the RA has yet to be defined and implemented. Fundamentally I have a problem calling these "New Standards." These appear to be more criteria for certification based on Standards, than Standards themselves. If there are adopted as Standards, there will be difficulty keeping them in sync with the Standards that they are based on. It is my opinion that these be kept separate from the Standards. Let the Standards set the Requirements and Measures. These documents should be used only to aggregate the Requirements and Measures into a package tailored to the entity being certified. There are too many unspecified compliance and non-compliance issues. If it can't be determined as to what level of non-compliance an entity is, how can certification be denied?
The intent of the Drafting Team is that as the Functional Model is revised, those revisions will be incorporated into the Certification Standards as applicable. It is anticipated that this will occur prior to the standards going to ballot, in which case, the Team will incorporate and seek industry affirmation of the changes. Industry consensus during the SAR process supported the development of these Certification Standards. The Certification Standards are unique in that they differ from the other standards. They are intended to have a one-time use for an entity and are also unique in that you must satisfy all of the requirements or certification will not be awarded. Because of this uniqueness, levels of compliance are not appropriate.	
Todd Johnson	

**Transmission Operator Certification Standard – Posting 1 - Comments**

Salt River Project	
William J. Smith Allegheny Power	No additional elements have been identified.
Edward Davis Entergy Services, Inc	
NPCC CP9, Reliability Standards Working Group Ralph Rufano - New York Power Authority Kathleen Goodman - ISO-New England Bob Pelligrini - United Illuminating Khaqan Khan - The IESO Greg Campoli - New York ISO Al Adamson - The New York State Reliability Council David Kiguel - Hydro One Networks, Ontario Peter Lebro - US National Grid Brian Hogue - NPCC Guy Zito - NPCC	<p>There presently has been no test developed to certify Transmission Operator.</p> <p>NPCC also recommends that the proposed version 1 TOP Stds. be thoroughly reviewed and reassessed by the SDT based on the outcomes and resolutions of existing registration and any FM updates and revisions.</p> <p>TOP certification stds: ORG-006/007/008: Although the measures pertaining to requirements are specified in these standards yet the compliance related requirements and/or levels of non-compliance are not specified. For the purposes of effective implementation/enforcement of these standards, we recommend that the associated compliance monitoring process and levels of non compliance should also be simultaneously specified.</p>

**Transmission Operator Certification Standard – Posting 1 - Comments**

There are several credentials that personnel can obtain to satisfy this requirement. The NERC System Operator Certification Program does have a Transmission Operator credential.

The intent of the Drafting Team is that as the Functional Model is revised, those revisions will be incorporated into the Certification Standards as applicable. It is anticipated that this will occur prior to the standards going to ballot, in which case, the Team will incorporate and seek industry affirmation of the changes.

The Certification Standards are unique in that they differ from the other standards. They are intended to have a one-time use for an entity and are also unique in that you must satisfy all of the requirements or certification will not be awarded. Because of this uniqueness, levels of compliance are not appropriate.

CenterPoint Energy Transmission Control/Real Time Operations John Jonte Dennis Caufield	None
TVA Kathy Davis Chuck Feagans James Regg Mitch Needham Bill Byrom Jerry Landers	None
Elizabeth Howell International Transmission Company (ITC)	
John Horakh MAAC	None
E. Nick Henery SMUD	
Edward C. Stein First Energy	

**11. Please identify any regional differences that should be included in the standards?**

Committer	Comment
Gerald Rheault Manitoba Hydro	
Peter Burke [on behalf of ATC's Paul Steinberger, Bobbi Welch, Jason Shaver, Tim Beach, Bruce Teague]  American Transmission Co.	None
Southern Company- Transmission, Operations, Planning and EMS divisions Jim Griffith - Southern Steve Corbin - Southern Jim Viikinsalo - Southern Lisa Kelley - Mississippi Power Rex Johnson - Savannah Power Company Gary Gorham - Alabama Power Company Billy Bush - Gulf Power Company Jeff Stansell - Georgia Power Company Matt Ansley - Southern Raymond Vice - Southern Mike Sanders - Southern	We do not currently know of any Regional differences at this time. However, during the initial phasing in of standards, each region may find adopting or developing a different approach provides increased reliability. Therefore, we believe that differences should be considered as they are identified in the future.

**Transmission Operator Certification Standard – Posting 1 - Comments**

Mike Oatts - Southern	
The standard would have to be revised to include them and have the Regional differences identified and processed through the Standard Process.	
Anita Lee  Alberta Electrical System Operator	
Linda Campbell - FRCC Mark Bennett - Gainesville Regional Utilities Steve Wallace - Seminole Electric Cooperative Steve McElhaney - Florida Municipal Power Agency Alan Gale - City of Tallahassee Ted Hobson - JEA Tom Washburn - Orlando Utilities Commission Tim Beyrle - Utilities Commission of New Smyrna Beach William Baldwin - Ft. Pierce Utilities Authority	None
Compliance and Certification Committee Bob Harbour - Continental Cooperative Services Ted Hobson - JEA Greg Campoli - NYISO	

**Transmission Operator Certification Standard – Posting 1 - Comments**

Paul Arnold - BPA – WECC Chuck Waits - METC - ECAR	
Cinergy Corp Doug Hils Larry Conrad Walt Yeager	
Southern Company Roman Carter Tony Reed Joel Dison Terry Crawley Tom Higgins Roger Green Lucius Burris Lloyd Barnes	At the current time we do not know of any regional differences that should be included with this standard. However, future regional differences could develop and this standard should not prevent them if justifiable.
The standard would not prevent them. The standard would have to be revised to include them and have the Regional differences identified and processed through the Standard Process.	
RTO/ISO Standards Review Committee Dale McMaster - AESO Ed Riley - CAISO Sam Jones - ERCOT Peter Henderson - IESO Peter Brandien - ISO-NE Bill Phillips - MISO Karl Tammar - NYISO Bruce Balmat - PJM	None

**Transmission Operator Certification Standard – Posting 1 - Comments**

Charles Yeung - SPP	
Operating Reliability Working Group (ORWG) Southwest Power Pool Ron Ciesiel - SPP Darrell Cipriany - AEP Bob Cochran - SPS Mike Gammon - KCPL Steve Hillman - WPEK Allen Klassen - Westar Bill Nolte - SECI Robert Rhodes - SPP Mike Stafford - GRDA	
Ed Riley California ISO	None
Verne Ingersoll Progress Energy - Carolinas	
Alex Cabrera Southern California Edison	No comment
Michael C. Calimano NYISO	
Travis Besier or Ellis Rankin TXU Electric Delivery Co.	
Kathleen Goodman ISO New England Inc	
Jack Alvarez	

**Transmission Operator Certification Standard – Posting 1 - Comments**

New York State Reliability Council	
P. D. Henderson IESO (Independent Electricity System Operator), Ontario	None
Kevin Conway GCPD	
Todd Johnson Salt River Project	
William J. Smith Allegheny Power	No regional differences have been identified.
Edward Davis Entergy Services, Inc	
NPCC CP9, Reliability Standards Working Group Ralph Rufano - New York Power Authority Kathleen Goodman - ISO-New England Bob Pelligrini - United Illuminating Khaqan Khan - The IESO Greg Campoli - New York ISO Al Adamson - The New York State Reliability Council David Kiguel - Hydro One	

**Transmission Operator Certification Standard – Posting 1 - Comments**

<p>Networks, Ontario                  Peter Lebro - US National Grid                  Brian Hogue - NPCC                  Guy Zito - NPCC</p>	
<p>CenterPoint Energy                  Transmission Control/Real Time Operations                  John Jonte                  Dennis Caufield</p>	<p>CenterPoint Energy defers to ERCOT on this question.</p>
<p>TVA                  Kathy Davis                  Chuck Feagans                  James Regg                  Mitch Needham                  Bill Byrom                  Jerry Landers</p>	<p>None</p>
<p>Elizabeth Howell                  International Transmission Company (ITC)</p>	
<p>John Horakh                  MAAC</p>	<p>None</p>
<p>E. Nick Henery                  SMUD</p>	<p>The WECC has its own Confidentiality Agreement and has an RMS Agreement that establishes a unique contractual structure within the WECC Region.</p>
<p>Although WECC has their own Confidentiality Agreement and an RMS Agreement, they should not be a consideration in granting NERC Certification unless they are identified as Regional differences, included in the standard, and go through the Standard Process.</p>	
<p>Edward C. Stein                  First Energy</p>	