

**Comment Form Proposed Transmission Operator Certification Standard**

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This form is to be used to submit comments on the proposed Draft 2 of the Transmission Operator Certification Standards. Comments must be submitted by **July 1, 2005**. You may submit the completed form by emailing it to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the words "TOP Certification Standards Comments" in the subject line. If you have questions please contact Mark Ladrow at [mark.ladrow@nerc.net](mailto:mark.ladrow@nerc.net) or by telephone at 609-452-8060.

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

- DO:**
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  - Do submit any formatted text or markups in a separate WORD file.

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

<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Robert Williams	
Organization:	PacifiCorp	
Telephone:	(503) 251-5197	
Email:	robert_l.williams@pacificorp.com	
NERC Region	Registered Ballot Body Segment	
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/>	5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users
<input checked="" type="checkbox"/> WECC	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> NA - Not Applicable		



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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

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Yes

No

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

## **Comment Form Proposed Transmission Operator Certification Standard**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

**Yes**

**No**

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

**Yes**

**No**

**Comments:**

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

**Comments:**

**Comment Form Proposed Transmission Operator Certification Standard**

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

**Comments:**

Dear Certification Standard Drafting Team, please consider the OC resolution below as a comment from the Operating Committee submitted pursuant to the current posting of the draft transmission operator certification standard:

Gerry:

At today's meeting, the OC talked about the proposed new data confidentiality agreement. Several TDU reps expressed their concern that the draft Transmission Operator certification standards require the Transmission Operator to sign this agreement. The OC then passed the following motion that it wished to submit to the drafting team:

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

I'd appreciate your passing this on to the drafting team.

Thanks,

don.

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<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	John Horakh, 06-15-2005
Organization:	MAAC
Telephone:	609-625-6014
Email:	john.horakh@conectiv.com
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
<input type="checkbox"/> ECAR	<input checked="" type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/> 3 - Load-serving Entities
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<input type="checkbox"/> NPCC	<input type="checkbox"/> 7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/> 8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/> 9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	
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- 1. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Certification standard?**

Yes

No

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

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Yes

No

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

**Yes**

**No**

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

**Yes**

**No**

**Comments:**

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

**Comments:**

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

**Comments:**

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Organization:		
Telephone:		
Email:		
NERC Region		Registered Ballot Body Segment
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1. **Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Certification standard?**

Yes

No

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

1. **Comments: The requirement that the transmission operator execute the NERC Data Confidentiality Agreement should be removed. There are entities that have not functionally separated and thus cannot sign the agreement. This requirement is discriminatory against those entities.**

**The requirement for the vertically integrated entity to have multiple agreements and or procedures in place between the generator operator and the transmission operator is burdensome and not practical.**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments: Not clear on what is required for AVR. R.2.9.**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

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Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

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Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments: Realizing a back-up control center is not a requirement in the standards it seems the only practical way to meet these requirements is to have a back-up control center. With this in mind, there should be adequate time allowed for the Transmission Operator to develop and implement these requirements at a back-up control center.**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

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

**Comments:**

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<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	Kenneth J. Skroback
Organization:	Alabama Electric Cooperative
Telephone:	334-427-3257
Email:	ken.skroback@powersouth.com
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
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No

Comments:

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

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

Yes

No

1. **Comments: Comments by Alabama Electric Cooperative, Inc. Regarding Draft #2 of the Transmission Operator Function**
2. **6/22/2005**
3. **Alabama Electric Cooperative, Inc. is submitting the following comments to support the removal of the requirement that an entity applying to be certified as a Transmission Operator (TOP) under the NERC Functional Model must execute the “Operating Reliability Data (ORD) Confidentiality Agreement” referenced in Draft #2 of the TOP certification requirements.**
4. **The requirement of a TOP to sign this agreement and the related functional unbundling requirement is problematic for some G&T Cooperatives and municipal joint action agencies that are currently control area operators (and others performing limited control functions) but do not require access to such data and are not required to functionally unbundle. Many entities have been successfully performing the Control Area Operator function (which for many includes the responsibilities of the TOP function) without being functionally unbundled and without receiving the reliability operating data the confidentiality agreement refers to.**
5. **Many systems are currently operating their transmission system without having signed the current Confidentiality Agreement, and there is no legitimate reason why these entities should not be allowed to continue operating their transmission systems under the Functional Model. The only legitimate and necessary reason for an entity to sign the agreement is if they are receiving security data from the ISN. Many systems currently provide all of the required security data to their reliability coordinator, but do not receive any ISN data in return. This should negate any need to sign the agreement.**

6. **AEC's only interconnections are with Oglethorpe, SMEPA and Southern Co. -- all of which are in the Southern Subregion. The Southern Subregion Reliability Coordinator (SSRC) provides an adequate wide-area view, while AEC monitors its own system. Via our Reliability Coordinator Agreement, AEC is obligated to honor any request or direction from the SSRC. AEC has been nearly perfect in both of our NERC Operations Compliance Audits, which demonstrates that you don't have to receive ISN data to operate a transmission system reliably.**
7. **This draft requirement, if left in place, would prevent both G&T Cooperatives and municipal systems that have not signed the ORD agreement and are not functionally separated, from continuing to reliably operate their own transmission systems.**
8. **It has also come to our attention that the NERC Operating Committee on June 8 unanimously passed a motion that stated in very clear terms the following:**
9. **"The certification standard should not require that the Transmission Operator sign the data confidentiality agreement."**
10. **The OC and its members from all segments of the electric utility industry have submitted this motion as comments in the TOP certification standard process. We fully endorse these OC comments and reiterate that all segments of the industry on the OC support removing the ORD agreement as a requirement to be certified as a TOP.**
11. **Finally, to date the draft ORD Confidentiality Agreement has not been included as a part of the draft certification requirement – it has only been referenced by the standard drafting team. We strongly believe that all documents and requirements necessary for certification as any Function under the NERC Functional Model should be a part of the standard drafting materials that are sent out for industry comments.**

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

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

**Yes**

**No**

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

## Comment Form Proposed Transmission Operator Certification Standard

---

No

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

**Comment Form Proposed Transmission Operator Certification Standard**

---

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

**Comments:**

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

**Comments:**

**Comment Form Proposed Transmission Operator Certification Standard**

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

<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Terry Gucciardo	
Organization:	Alliant Energy	
Telephone:	(319)786-3513	
Email:	terrygucciardo@alliantenergy.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/>	5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC		
<input type="checkbox"/> NA - Not Applicable		



## **Comment Form Proposed Transmission Operator Certification Standard**

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The Standard Drafting Team developed the TOP Certification Standards based on the scope outline in the related SAR, the Reliability Functional Model, and the Version 0 Reliability Standards. The reader may find it useful to review these documents to help understand the Standard Drafting Team's philosophy in creating this group of standards. The documents can be accessed at the following links:

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The current draft reflects the industry's comments on the SAR, industry comments on any prior drafts, and any comments, that were relevant to the class of certification standards, received during prior postings. Additional changes were made in the drafting of the standard to reflect the revisions made to the Functional Model since the drafting of the SAR.

The Certification Standard Drafting Team would like to receive industry comments on this group of standards. Accordingly, we request your comments included on this form, emailed with the subject "TOP Certification Standards Comments" by **July 1, 2005**.

## Comment Form Proposed Transmission Operator Certification Standard

---

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

## Comment Form Proposed Transmission Operator Certification Standard

---

Yes

No

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

## **Comment Form Proposed Transmission Operator Certification Standard**

---

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

**Yes**

**No**

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

**Yes**

**No**

**Comments:**

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

**Comments:**

**Comment Form Proposed Transmission Operator Certification Standard**

---

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

**Comments:**

**Comment Form Proposed Transmission Operator Certification Standard**

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<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	Gary Campbell
Organization:	MAIN
Telephone:	630-261-2656
Email:	ghc@maininc.org
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
<input type="checkbox"/> ECAR	<input checked="" type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/> 3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/> 4 - Transmission-dependent Utilities
<input checked="" type="checkbox"/> MAIN	<input type="checkbox"/> 5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/> 6 - Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input type="checkbox"/> 7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/> 8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/> 9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	
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## **Comment Form Proposed Transmission Operator Certification Standard**

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## Comment Form Proposed Transmission Operator Certification Standard

---

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

- Yes  
 No

**Comments: I think R7 should include an on-site visit of the back-up facilities as this can be an essential part of an emergency and help ensure preparedness for emergencies.**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

- Yes  
 No

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

- Yes  
 No

**Comments:**

## Comment Form Proposed Transmission Operator Certification Standard

---

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:** r 1.4 I think all entities such as RA , BA, TO etc. should all be covered in this requirement as coordination and cooperation may be needed by any one entity. The Measure should use the terminology " and use it tools" to ensure all everything is checked out. As it is written, an auditor can interpret the measure as only one of the three elements must be in place.

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments: R1 and C. Measure - The requirement and measure section should use the terminology " and facilitates " to ensure everything is in place and checked out. As it is written, an auditor can interpret the measure as only one of the four elements must be in place. R 2.5 - I think all entities such as RA , BA, TO etc. should all be covered in this requirement as coordination and cooperation may be needed by any one entity.**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

**Comment Form Proposed Transmission Operator Certification Standard**

---

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

**Comments:**

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

**Comments:**

**Comment Form Proposed Transmission Operator Certification Standard**

---

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<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	Barry Lawson
Organization:	National Rural Electric Cooperative Association (NRECA)
Telephone:	703-907-5781
Email:	barry.lawson@nreca.coop
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
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<input type="checkbox"/> WECC	
<input checked="" type="checkbox"/> NA - Not Applicable	



## **Comment Form Proposed Transmission Operator Certification Standard**

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## Comment Form Proposed Transmission Operator Certification Standard

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

Comments:

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

1. **Comments: Comments by the National Rural Electric Cooperative Association (NRECA) Regarding Draft #2 of the Transmission Operator Function Certification Requirements**
2. **Submitted July 1, 2005**
3. **NRECA is submitting the following comments to support the removal of the requirement that an entity applying to be certified as a Transmission Operator (TOP) under the NERC Functional Model must execute the “Operating Reliability Data (ORD) Confidentiality Agreement” referenced in Draft #2 of the TOP certification requirements.**
4. **The requirement of a TOP to sign this agreement and the related functional unbundling requirement is problematic for some G&T Cooperatives and municipal joint action agencies that are currently control area operators (and others performing limited control functions) but do not require access to such data and are not required to functionally unbundle. Many entities have been successfully performing the Control Area Operator function (which for many includes the responsibilities of the TOP function) without being functionally unbundled and without receiving the reliability operating data the confidentiality agreement refers to.**
5. **Many systems are currently operating their transmission system without having signed the current Confidentiality Agreement, and there is no legitimate reason why these entities should not be allowed to continue operating their transmission systems under the Functional Model. The only legitimate and necessary reason for an entity to sign the agreement is if they are receiving security data from the Interregional Security Network (ISN). Many systems currently provide all of the required security data to their reliability coordinator,**

## Comment Form Proposed Transmission Operator Certification Standard

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but do not receive any ISN data in return. This should negate any need to sign the agreement.

6. This draft requirement, if left in place, would prevent both G&T Cooperatives and municipal systems that have not signed the ORD agreement and are not functionally separated, from continuing to reliably operate their own transmission systems.
7. It has also come to our attention that the NERC Operating Committee on June 8 unanimously passed a motion that stated in very clear terms the following:
8. “The certification standard should not require that the Transmission Operator sign the data confidentiality agreement.”
9. The OC and its members from all segments of the electric utility industry have submitted this motion as comments in the TOP certification standard process. We fully endorse these OC comments and reiterate that all segments of the industry on the OC support removing the ORD agreement as a requirement to be certified as a TOP.
10. Finally, to date the draft ORD Confidentiality Agreement has not been included as a part of the draft certification requirement – it has only been referenced by the standard drafting team. We strongly believe that all documents and requirements necessary for certification as any Function under the NERC Functional Model should be a part of the standard drafting materials that are sent out for industry comments.

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

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

Comments:

## Comment Form Proposed Transmission Operator Certification Standard

---

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

## **Comment Form Proposed Transmission Operator Certification Standard**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

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

**Comments:**

**Comment Form Proposed Transmission Operator Certification Standard**

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Peter Burke [on behalf of ATC's Jason Shaver]	
Organization:	American Transmission Company	
Telephone:	262-506-6863	
Email:	PBurke@atcllc.com	
NERC Region	Registered Ballot Body Segment	
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/> 1 - Transmission Owners	
<input type="checkbox"/> ECAR	<input type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils	
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Functional Model and Related Documents: <http://www.nerc.com/~filez/functionalmode.html>

The current draft reflects the industry's comments on the SAR, industry comments on any prior drafts, and any comments, that were relevant to the class of certification standards, received during prior postings. Additional changes were made in the drafting of the standard to reflect the revisions made to the Functional Model since the drafting of the SAR.

The Certification Standard Drafting Team would like to receive industry comments on this group of standards. Accordingly, we request your comments included on this form, emailed with the subject "TOP Certification Standards Comments" by **July 1, 2005**.

## Comment Form Proposed Transmission Operator Certification Standard

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments: The SDT's response to comments included the statement that industry comments/concerns were forwarded to CCC. What was the response of CCC to industry comments/concerns? Can this group offer any assurances that the Administrative Procedures are being developed using an ANSI approved process?**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

1. **Comments: The existing language continues to place duplicative and potentially conflicting Requirements on companies that fall under both FERC and NERC oversight. This requirement would continue to require companies that fall under both FERC and NERC oversight to satisfy, at best, a duplicative process and, at worst, a conflictive process. If the intent of this requirement is to mimic what has been accomplished by FERC then additional clarifying language is in order.**

2. **Proposed Requirement:**

3. **R1.3 The Transmission Operator shall be exempt from Requirement 1, if it certifies that it falls under the jurisdiction of FERC's Standards of Conduct.**

4. **ATC requests that the SDT post the NERC Confidentiality Agreement.**

**The modifications to the term Agreement have not alleviated ATC's concern that this requirement creates the potential for legal blackmail. The Transmission Operator is the only entity that's penalized for not achieving the required agreements. Until the other entities are required to certify and have a reciprocal agreement, the Transmission Operator should be exempt from being required to enter into the specified agreements.**

## Comment Form Proposed Transmission Operator Certification Standard

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

Comments:

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

Comments: Requirement 4 states that a Transmission Operator must have procedures, processes and tools for monitoring, but Measure 2 states that it shall demonstrate that it can follow its procedures, processes or use its tools. These two statements are at odds with one another. Requirement 4 should be changed to:

The Transmission Operator shall have procedures, processes or tools for monitoring its transmission area with real-time data that includes:

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

Comments: What is the definition of the word “arrange?” A TOP should be able to determine and notify the Reliability Coordinator and/or Balancing Authority about the need for reactive resources, but it may not have the ability to procure

## Comment Form Proposed Transmission Operator Certification Standard

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and make payment for those services.

"Arrange" should be changed to "notify."

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

5. Comments: Requirement 1.6 assigns the act of shedding load to the Transmission Operator but does not take into consideration how a Transmission Operator sheds load. A Transmission Operator must have the ability to refuse a load shedding order if it believes that the act could cause greater problems on the bulk electrical system.

The only entity that should be able to order the Transmission Operator to shed load is the Reliability Coordinator. In addition, it should be the Reliability Coordinator that informs the Transmission Operator of which loads/lines to shed/open.

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

Comments: The word "arrange" in Requirement 2.8 should be changed to "notify."

## **Comment Form Proposed Transmission Operator Certification Standard**

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Please see our comments under Question 5.

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

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

**Comments:**

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

**Comments:**

**Comment Form Proposed Transmission Operator Certification Standard**

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This form is to be used to submit comments on the proposed Draft 2 of the Transmission Operator Certification Standards. Comments must be submitted by **July 1, 2005**. You may submit the completed form by emailing it to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the words "TOP Certification Standards Comments" in the subject line. If you have questions please contact Mark Ladrow at [mark.ladrow@nerc.net](mailto:mark.ladrow@nerc.net) or by telephone at 609-452-8060.

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

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

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

<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Ben Porath	
Organization:	Dairyland Power Cooperative	
Telephone:	(608) 526-3073	
Email:	blp@dairynet.com	
NERC Region	Registered Ballot Body Segment	
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/>	5 - Electric Generators
<input checked="" type="checkbox"/> MAPP	<input type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC		
<input type="checkbox"/> NA - Not Applicable		



## **Comment Form Proposed Transmission Operator Certification Standard**

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The Standard Drafting Team developed the TOP Certification Standards based on the scope outline in the related SAR, the Reliability Functional Model, and the Version 0 Reliability Standards. The reader may find it useful to review these documents to help understand the Standard Drafting Team's philosophy in creating this group of standards. The documents can be accessed at the following links:

TOP SAR and Related Documents: <http://www.nerc.com/~filez/standards/Certification-Transmission.html>

Functional Model and Related Documents: <http://www.nerc.com/~filez/functionalmodel.html>

The current draft reflects the industry's comments on the SAR, industry comments on any prior drafts, and any comments, that were relevant to the class of certification standards, received during prior postings. Additional changes were made in the drafting of the standard to reflect the revisions made to the Functional Model since the drafting of the SAR.

The Certification Standard Drafting Team would like to receive industry comments on this group of standards. Accordingly, we request your comments included on this form, emailed with the subject "TOP Certification Standards Comments" by **July 1, 2005**.

## Comment Form Proposed Transmission Operator Certification Standard

---

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments: See Attached Comments in Separate Word Document**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

## Comment Form Proposed Transmission Operator Certification Standard

---

Yes

No

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

## **Comment Form Proposed Transmission Operator Certification Standard**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

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

**Comments:**

**Comment Form Proposed Transmission Operator Certification Standard**

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

**Comments:**

Comments by Dairyland Power Cooperative (DPC) Regarding Draft #2 of the Transmission Operator Function Certification Requirements

July 7, 2005

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

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

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

DPC is interconnected with Xcel Energy (NSP), Alliant Energy – West (ALTW), the American Transmission Company (ATC), Southern Minnesota Municipal Power Agency (SMMPA), Corn Belt Power Cooperative (CBPC), and Northwestern Wisconsin Electric Company (NWEC). All of the entities DPC interconnects with are either Midwest ISO (MISO) or Mid-Continent Area Power Pool (MAPP) members. MISO provides reliability coordination services to both the MAPP and MISO members. MISO, as the Regional Reliability Coordinator, provides an adequate wide-area view, while DPC monitors its own system. Via an agreement between MAPP and MISO for reliability coordination related services, DPC, as a MAPP member, is obligated to honor any request or direction from MISO acting as the Regional Reliability Coordinator.

DPC does not connect to the ISN. DPC, through direct data links, connects to its neighboring utilities to receive external transmission information required to operate the DPC transmission system. DPC does exchange data with MAPP, however, data DPC receives from MAPP is only a pass-through of data from a neighboring utility and is not ISN data. DPC had a satisfactory review in its 2002 MAPP/NERC Compliance Audit, which demonstrates that a transmission operator does not have to receive ISN data to operate a transmission system reliably.

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

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

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

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

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

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

July 7, 2005

Ben Porath  
Dairyland Power Cooperative

**Comment Form – Proposed Balancing Authority Certification Standards**

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This form is to be used to submit comments on the proposed Draft 3 of the Balancing Authority Certification Standards. Comments must be submitted by **July 1, 2005**. You may submit the completed form by emailing it to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the words “BA Certification Standards Comments” in the subject line. If you have questions please contact Mark Ladrow at [mark.ladrow@nerc.net](mailto:mark.ladrow@nerc.net) or by telephone at 609-452-8060.

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

<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	Alan Gale
Organization:	City of Tallahassee (TAL)
Telephone:	(850) 891-3025
Email:	galea@talgov.com
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
<input checked="" type="checkbox"/> FRCC	<input type="checkbox"/> 3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/> 4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input checked="" type="checkbox"/> 5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/> 6 - Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input type="checkbox"/> 7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/> 8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/> 9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	
<input type="checkbox"/> NA - Not Applicable	



## **Comment Form – Proposed Balancing Authority Certification Standards**

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The Standard Drafting Team developed the BA Certification Standards based on the scope outline in the related SAR, the Reliability Functional Model, and the Version 0 Reliability Standards. The reader may find it useful to review these documents to help understand the Standard Drafting Team's philosophy in creating this group of standards. The documents can be accessed at the following links:

BA SAR and Related Documents: <http://www.nerc.com/~filez/standards/Certification-Balancing.html>

Functional Model and Related Documents: <http://www.nerc.com/~filez/functionalmodel.html>

The current draft reflects the industry's comments on the SAR, industry comments on any prior drafts, and any comments, that were relevant to the class of certification standards, received during prior postings. Additional changes were made in the drafting of the standard to reflect the revisions made to the Functional Model since the drafting of the SAR.

The Certification Standard Drafting Team would like to receive industry comments on this group of standards. Accordingly, we request your comments included on this form, emailed with the subject "BA Certification Standards Comments" by **July 1, 2005**.

### **Balancing Authority Certification – Certification Modification**

During the 2<sup>nd</sup> posting of the Balancing Authority Certification Standard, the Drafting Team received more comments regarding the inclusion of the Certification Process in the standard. After further consideration, the Standard Drafting Team has modified the standard regarding the inclusion of the process and wishes to provide some background information to the industry in seeking affirmation of the modifications.

Comments regarding the inclusion of the process started during the SAR process. The SAR Drafting Team at that time sought the guidance of NERC Legal Counsel to obtain input into how they should proceed. The opinion, at that time, was that since there was no other procedure in place for approval of the Certification Process, it should remain in the standard to maintain a consistent implementation. There was some concern expressed that although the process was in the standard, it did not necessarily fit the format of typical standards. Even though industry consensus was obtained during the SAR process, a minority opinion was expressed and continued to be expressed in subsequent postings of all SARs and Standards.

Since the SAR was approved to proceed to the Standard Drafting phase, the Certification & Compliance Committee (CCC) has been formed. As part of the scope for this Standing Committee, they have the responsibility for developing administrative procedures for NERC Certification Programs.

As a result of these continued comments on the Certification Process being contained in the standard, the Drafting Team sought NERC Legal Counsel input due to the formation of the CCC. NERC Legal Counsel recommendation was to remove the process from the standard and place it in the area of responsibility for the CCC. The process that is anticipated to occur through this path would be for the CCC to refine the current process, seek industry input, incorporate the input obtained into the process, and then seek NERC Board of Trustees approval for adoption. By utilizing this process, an administrative advantage is realized. Much like the procedures that are being used for the Control Area Readiness Audits, if adjustments are needed to refine the process,

## **Comment Form – Proposed Balancing Authority Certification Standards**

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it can be accomplished more expeditiously through this recommended process than if it were part of the Standard. Although the Certification Process would not be a standard, it is still anticipated that all certifications would be administered consistently throughout the industry. The Drafting Team has included this requirement in the modifications that have been made to the standard.

In modifying the standard, the Drafting Team has maintained some key elements to ensure: consistent administration of the certification process, the criteria that must be adhered to, and established a clear requirement that all entities performing the Balancing Authority function must be NERC Certified. **Those who submitted comments in the 1st posting of the Transmission Operator Certification Standards supported the modification.**

## Comment Form – Proposed Balancing Authority Certification Standards

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It is because of the above stated reasons that the Standard Drafting Team has made these modifications to the standard and seeks industry affirmation and support for its actions.

**1. Do you agree with the modifications made to the Balancing Authority Certification – Certification standard in removing the administrative process from the standard?**

Yes

No

Comments:

**Standard – ORG-009-1 - Balancing Authority Certification – Certification**

Based on comments received during the 2<sup>nd</sup> posting of the Balancing Authority Certification Standards and the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

Comments:

**Standard – ORG-010-1 - Balancing Authority Certification – Agreements**

Based on comments received during the 2<sup>nd</sup> posting of the Balancing Authority Certification Standards and the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

Comments: R1.1.4 - The meaning of "balanced interchange schedules" is unclear. Unless "balanced" adds some particular meaning which can be defined, suggest restating R1.1.4. to "Adhering to interchange schedules."

R1.1.4 and R2.6 both refer to "interchange schedules". The term is capitalized in R2.6, but not in R1.1.4. Is there a distinction intended? If so, please clarify. Otherwise, make the terminology consistent.

**Standard – ORG-011-1 - Balancing Authority Certification – Personnel**

Based on comments received during the 2<sup>nd</sup> posting of the Balancing Authority Certification Standards and the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

## Comment Form – Proposed Balancing Authority Certification Standards

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Yes

No

Comments:

### **Standard – ORG-012-1 - Balancing Authority Certification – Balancing**

Based on comments received during the 2<sup>nd</sup> posting of the Balancing Authority Certification Standards, the Drafting has made modification to provide clarification to the standard.

**5. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Balancing Authority Certification – Balancing standard?**

Yes

No

Comments:

### **Standard – ORG-013-1 - Balancing Authority Certification – Data Acquisition**

Based on comments received during the 2<sup>nd</sup> posting of the Balancing Authority Certification Standards, the Drafting has made modification to provide clarification to the standard.

**6. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Balancing Authority Certification – Data Acquisition standard?**

Yes

No

Comments: R2. The requirement should be changed to: "The Balancing Authority shall have procedures, processes, and tools for acquiring or developing:". This recognizes that many BA's may actually be developing things like load forecasts themselves rather than acquiring from others.

R3.4. Should be restated as "Load shedding directives".

### **Standard – ORG-014-1 - Balancing Authority Certification – Frequency Control**

Based on comments received during the 2<sup>nd</sup> posting of the Balancing Authority Certification Standards, the Drafting has made modification to provide clarification to the standard.

**7. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Balancing Authority Certification – Frequency Control standard?**

Yes

No

## Comment Form – Proposed Balancing Authority Certification Standards

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Comments:

### **Standard – ORG-015-1 - Balancing Authority Certification – Interchange Approval and Implementation**

Based on comments received during the 2<sup>nd</sup> posting of the Balancing Authority Certification Standards, the Drafting has made modification to provide clarification to the standard.

**8. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Balancing Authority Certification – Interchange Approval and Implementation standard?**

Yes

No

Comments: R.1 - What is the expectation of the tool that will determine if scheduled ramps can be met? This is a current problem based on frequency swings seen today on or near the start and end of the "on-peak" time periods. How will a BA certify it can meet the ramp for each day of a several day schedule? Shouldn't the problem be fixed before we expect any new BA's to fix it on their own?

### **Standard – ORG-016-1 - Balancing Authority Certification – Information Dissemination**

Based on comments received during the 2<sup>nd</sup> posting of the Balancing Authority Certification Standards, the Drafting has made modification to provide clarification to the standard.

**9. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Balancing Authority Certification – Information Dissemination standard?**

Yes

No

Comments:

## Comment Form – Proposed Balancing Authority Certification Standards

---

### Standard – ORG-017-1 - Balancing Authority Certification – Emergency Operations

Based on comments received during the 2<sup>nd</sup> posting of the Balancing Authority Certification Standards and the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

**10. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Balancing Authority Certification – Emergency Operations standard?**

Yes

No

Comments: R1.3 is too broad. Suggest re-wording to something like: "Has experienced an actual or suspected act of sabotage affecting, or potentially affecting, critical infrastructure facilities and/or the BA's ability to carry out it's real time obligations."

### Standard – ORG-018-1 - Balancing Authority Certification – Loss of Control Center Functionality

Based on comments received during the 2<sup>nd</sup> posting of the Balancing Authority Certification Standards and the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

Comments: R2.1 - Delete last bullet. As long as the systems remain functional what is the concern. This requirement is too prescriptive and burdensome.

R2.11 - Same as ORG-015-1.

R2.13.1 and R2.13.2 should be deleted. The goal is to perform real time functions during the loss of the Primary Facility. The SC should already have the BIOP, and I doubt changes will be made to it while combatting the loss of the primary facility.

### Standard – ORG-019-1 - Balancing Authority Certification – Reporting Requirements

The Drafting Team determined that this standards was redundant with the elements included in ORG-009-1 Balancing Authority Certification – Certification, Requirement R3. Based on determination, the Drafting Team has deleted this standard.

**12. Do you agree with this modification?**

Yes

**Comment Form – Proposed Balancing Authority Certification Standards**

---

No

Comments:

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

Comments:

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

Comments:

**Comment Form Proposed Transmission Operator Certification Standard**

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This form is to be used to submit comments on the proposed Draft 2 of the Transmission Operator Certification Standards. Comments must be submitted by **July 1, 2005**. You may submit the completed form by emailing it to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the words "TOP Certification Standards Comments" in the subject line. If you have questions please contact Mark Ladrow at [mark.ladrow@nerc.net](mailto:mark.ladrow@nerc.net) or by telephone at 609-452-8060.

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

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



## **Comment Form Proposed Transmission Operator Certification Standard**

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The Standard Drafting Team developed the TOP Certification Standards based on the scope outline in the related SAR, the Reliability Functional Model, and the Version 0 Reliability Standards. The reader may find it useful to review these documents to help understand the Standard Drafting Team's philosophy in creating this group of standards. The documents can be accessed at the following links:

TOP SAR and Related Documents: <http://www.nerc.com/~filez/standards/Certification-Transmission.html>

Functional Model and Related Documents: <http://www.nerc.com/~filez/functionalmode.html>

The current draft reflects the industry's comments on the SAR, industry comments on any prior drafts, and any comments, that were relevant to the class of certification standards, received during prior postings. Additional changes were made in the drafting of the standard to reflect the revisions made to the Functional Model since the drafting of the SAR.

The Certification Standard Drafting Team would like to receive industry comments on this group of standards. Accordingly, we request your comments included on this form, emailed with the subject "TOP Certification Standards Comments" by **July 1, 2005**.

## Comment Form Proposed Transmission Operator Certification Standard

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

- Yes  
 No

**Comments:** The Compliance and Certification Committee (a NERC stakeholder group) thanks the standard drafting team for removing the certification process from the standard. The Organization Certification Working Group (a group reporting to the CCC) has taken the process language that was removed from the standard, drafted a more detailed process, and is working on a transition plan and training documents for entities that wish to register and certify. The CCC expects to post the process documents publicly for comment and will coordinate the posting with the standard drafting team. The CCC will have the flexibility to improve the certification process to benefit the industry. The CCC is pleased with the addition of the delegation of tasks language in the standard. The CCC is concerned about Requirements 6 and 7 and Measures 3 and 4. Requirement 6 requires the regions to perform the certification. Measure 4 requires the regional reliability organization to administer the certification process. Requirement 7 calls for a site visit to complete the certification process. Requirements like these, to manage the certification of entities and the details of the certification process, will likely be part of the delegation agreement that NERC will have with each of the regions. Measure 3 is a measure that will result in failure to be certified. Therefore, the requirements may not be enforceable using Measure 3. Requirement 7 states a process requirement for the NERC organization certification process that also may not be enforceable. The CCC requests that the drafting team consult with NERC counsel regarding the appropriateness of including these provisions as part of the standards as opposed to being part of a delegation agreement with the regional reliability organizations.

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

- Yes  
 No

**Comments:**

## Comment Form Proposed Transmission Operator Certification Standard

---

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

## **Comment Form Proposed Transmission Operator Certification Standard**

---

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

**Comment Form Proposed Transmission Operator Certification Standard**

---

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

**Comments:**

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

**Comments:**

**Comment Form Proposed Transmission Operator Certification Standard**

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
Email:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities
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<input checked="" type="checkbox"/> WECC		
<input checked="" type="checkbox"/> NA - Not Applicable		



## **Comment Form Proposed Transmission Operator Certification Standard**

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The Standard Drafting Team developed the TOP Certification Standards based on the scope outline in the related SAR, the Reliability Functional Model, and the Version 0 Reliability Standards. The reader may find it useful to review these documents to help understand the Standard Drafting Team's philosophy in creating this group of standards. The documents can be accessed at the following links:

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The current draft reflects the industry's comments on the SAR, industry comments on any prior drafts, and any comments, that were relevant to the class of certification standards, received during prior postings. Additional changes were made in the drafting of the standard to reflect the revisions made to the Functional Model since the drafting of the SAR.

The Certification Standard Drafting Team would like to receive industry comments on this group of standards. Accordingly, we request your comments included on this form, emailed with the subject "TOP Certification Standards Comments" by **July 1, 2005**.

## Comment Form Proposed Transmission Operator Certification Standard

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:** The NERC PS feels that the training requirement R2 is insufficient with respect to being able to measure the organizations' ability to successfully meet the requirement. The tasks listed in requirement R1 may be sufficient to identify a Transmission Operator Organization, but the task list is not comprehensive enough to constitute the definition of a quality training program. Requirement R2.1 is also insufficient with respect to the retention of records. Retention of this limited amount of data would prove only that some form of "training" took place but would not provide enough information to determine if the organization had any structured program or assurance of quality and participant achievement. The PS recommends language be inserted into the standard requiring adherence to the present PER-003 and it's planned successor which is being drafted by the PS. Having training requirements within multiple standards has the potential to cause confusion within the industry for both the organization and the compliance and readiness audit staff.

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

## Comment Form Proposed Transmission Operator Certification Standard

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No

Comments:

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

Comments:

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

Comments:

**Comment Form Proposed Transmission Operator Certification Standard**

---

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

**Comments:**

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<input type="checkbox"/> WECC	<input type="checkbox"/>	
<input type="checkbox"/> NA - Not Applicable	<input type="checkbox"/>	

## Comment Form Proposed Transmission Operator Certification Standard

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

**Group Name:** FRCC  
**Lead Contact:** Linda Campbell  
**Contact Organization:** FRCC  
**Contact Segment:** 2  
**Contact Telephone:** 813-289-5644  
**Contact Email:** lcampbell@frcc.com

Additional Member Name	Additional Member Organization	Region*	Segment*
Eric Senkowicz	FRCC	FRCC	2
Steve Wallace	Seminole Electric Cooperative	FRCC	5
Alan Gale	City of Tallahassee	FRCC	5
Ben Sharma	Kissimmee Utility Authority	FRCC	3
Thomas Washburn	Orlando Utilities Commission	FRCC	3
Eric Grant	Progress Energy - Florida	FRCC	1
Ed Devarona	Florida Power & Light	FRCC	1
Joseph Krupar	Florida Municipal Power Agency	FRCC	3
Ron Donahey	Tampa Electric Company	FRCC	1
Mark Bennett	Gainesville Regional Utilities	FRCC	5
Paul Elwing	City of Lakeland	FRCC	5

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

Background Information:

## **Comment Form Proposed Transmission Operator Certification Standard**

---

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## Comment Form Proposed Transmission Operator Certification Standard

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

- Yes  
 No

**Comments: Add statement in "Purpose" section to provide the clear intent of this standard. Suggest the following: "This standard applies, only for the initial certification of an entity as a Transmission Operator. "**

**In "Applicability" section, suggest removing "Entities seeking certification as a" and leaving "Transmission Operator". This is clearer and more consistent with the standards process format and language. The added words from the previous draft, are unnecessary, confusing and inherently implied.**

**Suggest deleting "Requirement R2 and R5". These are redundant to "Requirement R1" and to the whole premise of the standard.**

**"Measures" and "Compliance" section should reflect deletions of "Requirements" R2 and R5.**

**In "Additional Compliance Information" suggest adding "1.4.1 Once an entity is certified, it becomes subject to the relevant compliance elements of the NERC Reliability Standards." This will provide a clearer transition of compliance expectations and responsibilities.**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

- Yes  
 No

**Comments: Add statement in "Purpose" section to provide the clear intent of this standard. Suggest the following: "This standard applies, only for the initial certification of an entity as a Transmission Operator. "**

**In "Applicability" section, suggest removing "Entities seeking certification as a" and leaving "Transmission Operator". This is clearer and more consistent with the standards process format. The added words are unnecessary.**

**Requirement R1, requiring execution of the NERC Confidentiality Agreement, should be eliminated. The requirement has nothing to do with reliability. A TOP may obtain all the information it needs from others pursuant to bi-lateral agreements. Executing the NERC Confidentiality Agreement should only be**

necessary if the entity is going to receive the confidential reliability data, but need not be a specific requirement here. It is currently a requirement to sign it, before you are allowed to receive the data, so why does it have to be a requirement in this process?

If the requirement is not eliminated, an FRCC regional difference should be identified as the FRCC has facilities for intra-regional data sharing pursuant to a regional agreement.

Requirement R2 refers to a "Transmssion Area". Is this the same as the defined term "Transmission Operator Area"? If it is the same, it should be changed to "Transmission Operator Area" and the definition moved from ORG-004-1 to here since this is it's first occurance. If it's not the same it should be defined.

R2- Recommend inserting "as necessary" after "and adjacent Transmission Operators". This will allow vertically integrated utilities to not have to have a written agreement with themselves to provide themselves with their own data, minimizing unnecessary burden.

In R2.1.10, suggest replacing "Reduce voltage" with "Direct use of voltage reduction", to be more consistent with industry terminology and acknowledge that voltage reduction should occur on the distribution system via the Distribution Provider.

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments: Purpose is grammatically incorrect. Recommend deleting "has". Also change "responsibilities" to "tasks". You can have a responsibility to perform a task, but you cannot perform a responsibility.**

**Add statement in "Purpose" section to provide the clear intent of this standard. Suggest the following: "This standard applies, only for the initial certification of an entity as a Transmission Operator. "**

**In "Applicability" section, suggest removing "Entities seeking certification as a" and leaving "Transmission Operator". This is clearer and more consistent with the standards process format. The added words are unnecessary.**

**Suggest deleting second bullet in R1.1, "Deploy reactive resources to maintain acceptable voltage profiles.". This is over-prescriptive and redundant to the first bullet.**

**Suggest deleting third bullet in R1.1, "Notify Generator Operators of**

transmission system problems", as this is very ambiguous (problems?) and may cause inadvertent violations of federal standards of conduct.

In R1.1, fifth bullet; change to read "Coordinate voltage reduction and/or load shedding with, or as directed by, the Reliability Coordinator." This better corresponds to the commitment in ORG-002-1, R2.1.10.

In R1.1, sixth bullet; change to read "Direct Distribution Providers to reduce voltage or shed load." This better captures the direction possible to the Distribution Providers.

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:** In "Purpose" section, suggest deleting "protection and control" or else defining what this type of data is, in a proposed definition. Revision would read, "real-time transmission and generation data in order to".

Also suggest to add statement in "Purpose" section to provide the clear intent of this standard. Suggest the following: "This standard applies, only for the initial certification of an entity as a Transmission Operator. "

In "Applicability" section, suggest removing "Entities seeking certification as a" and leaving "Transmission Operator". This is clearer and more consistent with the standards process format. The added words are unnecessary.

In R1; suggest reversing "periodicity" and "transmittal" to read "...data required, transmittal periodicity, format...".

In R1; please provide what the "time frame" refers to. Is it different than the "transmittal periodicity"?

In R2.7; please provide more detail for what is intended with "system protection and control information"

In R2.8; suggest changing "Generator reactive supply" to "Generator reactive capability".

In R4.6; what will determine if phase angle monitoring is, or is not, required?

Should we specify phase angle of what?

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments: Suggest adding the following to Purpose statement: "or has appropriately delegated the tasks of ". Revised purpose statement would read as follows: "To ensure that the entity seeking certification as a Transmission Operator has the ability, or has appropriately delegated the task of performing system analysis, developing contingency plans, and operating its Transmission Operator area within established limits".**

**Add statement in "Purpose" section to provide the clear intent of this standard. Suggest the following: "This standard applies, only for the initial certification of an entity as a Transmission Operator. "**

**In "Applicability" section, suggest removing "Entities seeking certification as a" and leaving "Transmission Operator". This is clearer and more consistent with the standards process format. The added words are unnecessary.**

**In R1, the terms "real-time reliability analysis" are somewhat ambiguous. This should be defined more specifically to allow a prospective TO understand the scope of the requirement. Are these implying that the TO will operate equipment within their ratings and receive alarms when operating above ratings? If this is the case, it should be stated as such, or is this intended to cover Contingency Analysis, which is already covered in R2?.**

## Comment Form Proposed Transmission Operator Certification Standard

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments: Add statement in "Purpose" section to provide the clear intent of this standard. Suggest the following: "This standard applies, only for the initial certification of an entity as a Transmission Operator. "**

**In "Applicability" section, suggest removing "Entities seeking certification as a" and leaving "Transmission Operator". This is clearer and more consistent with the standards process format. The added words are unnecessary.**

**Requirement R1.3 should be modified to "...physical or cyber asset within its Transmission Operator Area impacting critical infrastructure facilities or transmission system operations."**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments: Add statement in "Purpose" section to provide the clear intent of this standard. Suggest the following: "This standard applies, only for the initial certification of an entity as a Transmission Operator. "**

**In "Applicability" section, suggest removing "Entities seeking certification as a" and leaving "Transmission Operator". This is clearer and more consistent with the standards process format. The added words are unnecessary.**

**Requirement R1, last bullet reads, "Loss of control center support functions, i.e. air conditioning, power, or water." should be deleted. This is beyond the scope of Reliability and over-prescriptive in terms of the certification process. As long as an entity remains "functional", which is captured under the rest of the certification standard, Reliability will be preserved.**

**Requirement R2, suggest clarifying what is referred to by "maintenance plan" and "construction plans". Are these daily operating maintenance plans and construction plans or "long-term" (30 days or greater) plans.**

**R2.6 "Performing real-time reliability analysis" requires the same clarification that was required in ORG-005-1, R1.**

**R2.1 through R2.10; why is this list different from the "tasks considered real-time Transmission Operator responsibilities" identified in ORG-003-1? We believe they should be the same. The goal is to continue "real-time operations" during the loss of the control center.**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments: Add statement in "Purpose" section to provide the clear intent of this standard. Suggest the following: "This standard applies, only for the initial certification of an entity as a Transmission Operator."**

**Use of the word "detailed" in purpose is subject to varying interpretations, suggest removing.**

**In "Applicability" section, suggest removing "Entities seeking certification as a" and leaving "Transmission Operator". This is clearer and more consistent with the standards process format. The added words are unnecessary.**

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

**Comments: The FRCC suggests that as these standards proceed through the development process, special attention and consideration be made with respect to the implementation plan. These standards significantly increase the required documentation of procedures and processes. They will in some cases, especially for smaller entities, require a significant amount of effort and resources. The implementation plan should allow sufficient time for development of standardized and effective documentation, processes and procedures by entities as they proceed through the certification process.**

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

**Comments: Reiterating our response to question number 2: Requirement R1, requiring execution of the NERC Confidentiality Agreement, should be eliminated. The requirement has nothing to do with reliability. A TOP may obtain all the information it needs from others pursuant to bi-lateral agreements. If the requirement is not eliminated, an FRCC regional difference should be identified as the FRCC has facilities for intra-regional data sharing pursuant to a regional agreement.**

**Comment Form Proposed Transmission Operator Certification Standard**

---

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Roger Champagne	
Organization:	Hydro-Québec TransÉnergie	
Telephone:	514-289-2211	
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NERC Region	Registered Ballot Body Segment	
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/>	5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC		
<input type="checkbox"/> NA - Not Applicable		



## **Comment Form Proposed Transmission Operator Certification Standard**

---

The Standard Drafting Team developed the TOP Certification Standards based on the scope outline in the related SAR, the Reliability Functional Model, and the Version 0 Reliability Standards. The reader may find it useful to review these documents to help understand the Standard Drafting Team's philosophy in creating this group of standards. The documents can be accessed at the following links:

TOP SAR and Related Documents: <http://www.nerc.com/~filez/standards/Certification-Transmission.html>

Functional Model and Related Documents: <http://www.nerc.com/~filez/functionalmode.html>

The current draft reflects the industry's comments on the SAR, industry comments on any prior drafts, and any comments, that were relevant to the class of certification standards, received during prior postings. Additional changes were made in the drafting of the standard to reflect the revisions made to the Functional Model since the drafting of the SAR.

The Certification Standard Drafting Team would like to receive industry comments on this group of standards. Accordingly, we request your comments included on this form, emailed with the subject "TOP Certification Standards Comments" by **July 1, 2005**.

## Comment Form Proposed Transmission Operator Certification Standard

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

1. **Comments: There is no mention of voltage support from Transmission Owners. These owners have cap banks and reactors that are vital in support system voltage.  
Please clarify if all personnel to which some tasks may be delegated has to sign the same agreements**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments: Please clarify if all personnel to which some tasks may be delegated during Loss of Control Center Functionality must also be NERC certified**

## Comment Form Proposed Transmission Operator Certification Standard

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

**Yes**

**No**

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

**Yes**

**No**

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

**Yes**

**No**

**Comments: Yes, the entity seeking certification must have the capability to continue operations during emergency conditions. The entity must have communication protocol in place to allow other transmission entities to communicate vital information via more than one communication media. The transmission operator must be able to take actions up to and including**

## Comment Form Proposed Transmission Operator Certification Standard

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shedding of firm load when directed by the Reliability Coordinator. This needs to be updated/included in standard.

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:** The entity seeking certification has to have the procedures processes tools and facilities to continue to operate according to NERC standards in the event of loss of its control centre. The standard requires an update.

The existing version-0 NERC standard (re:EOP-008-0 ) prescribes a requirement that clearly outlines that an 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 standard.

re: R1: The foot note statement related to SCADA (voice ....)is confusing. The footnote needs to be clarified and/or reworded.

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

9. Please identify any elements that should be included in the standards that have not been identified?
  
2. **Comments: Additional Comments:** With regards to the definition of the Agreement, we recommend that following wording should be added in the beginning of the proposed statement/definition of Agreement i.e. “For purposes of applying the term ‘Agreement’ within this standard it shall mean.....”
3. It is expected that audits will be conducted for these standards. In that case we suggest that data retention period be specified.
4. We recommend that the proposed standards be thoroughly reviewed and reassessed by the SDT based on the outcomes and resolutions of existing registration and any Functional Model updates and revisions
5. Moreover, the implementation and application of this standard in terms of coordination with other Functional Model related entities should need to allow for a transition period until the FM related entities are fully registered/certified.
6. Also, for this Standard and all the Certification Standards it is important to clarify that Certification will be done only to meet this standard and not the Functional Model. Any changes to the Functional Model must be reflected in this standard by revision through the Reliability Standards Process.
  
10. Please identify any regional differences that should be included in the standards?

**Comments:**

**Comment Form Proposed Transmission Operator Certification Standard**

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

<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Kathleen A. Davis	
Organization:	Tennessee Valley Authority	
Telephone:	423-751-6172	
Email:	kadavis@tva.gov	
NERC Region	Registered Ballot Body Segment	
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities
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## **Comment Form Proposed Transmission Operator Certification Standard**

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The Certification Standard Drafting Team would like to receive industry comments on this group of standards. Accordingly, we request your comments included on this form, emailed with the subject "TOP Certification Standards Comments" by **July 1, 2005**.

## Comment Form Proposed Transmission Operator Certification Standard

---

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

- Yes  
 No

**Comments: This appears to be more of a procedure than a standard. These requirements seem to be redundant of the existing NERC Standards. Keeping both sets of requirements current, could present a problem.**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

- Yes  
 No

**Comments: R2.1.4 - does this refer to IROL only? RC should not be involved with SOLs**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

- Yes  
 No

**Comments: R1 - Trainees will take up to one year to certify while working on shift and under the direct supervision of a certified TOP.**

**The requirements statements in R2 and R.2.1. are both clear and understandable with regard to what must be trained on and what type of documentation/records must be maintained. One thing missing however is the retention period for the records. The NERC CE program states that records of continuing training used for certification must be retained for a 3 year period. The requirements section on personnel certification should specify a retention period or refer to another document that provides this guidance.**

**My main concern focuses on section M2. It states "....record of all training activities for personnel identified in Requirement R2." This could be interpreted to mean any training whether it addressed the topics specified in R2 or not must be maintained available for inspection. I believe it would more appropriate if read "....record of required training activities...." or "....record of personnel training activities identified in Requirement R2."**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments: R3.2 - need clarification as to what "coordinate" means in this sentence.**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments: R3 - Should say "as time permits"**

## Comment Form Proposed Transmission Operator Certification Standard

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments: Are these requirements different from what are in the existing NERC Standards? If not, why have them restated here? At least, reference the NERC Stds.**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments: R2.4 - need clarification as to what "coordinating" means in this sentence.**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments: Are these requirements different from what are in the existing NERC Standards? If not, why have them restated here? At least, reference the NERC Stds.**

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

**Comments:**

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

**Comments:**

**Comment Form Proposed Transmission Operator Certification Standard**

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<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	P. D. Henderson
Organization:	Independent Electricity System Operator (IESO), Ontario
Telephone:	905-855-6258
Email:	Peter.Henderson@ieso.ca
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
<input type="checkbox"/> ECAR	<input checked="" type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/> 3 - Load-serving Entities
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## **Comment Form Proposed Transmission Operator Certification Standard**

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## Comment Form Proposed Transmission Operator Certification Standard

---

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

1. **Comments: Requirements 1 and 5 are redundant. We suggest that R5 should be deleted.**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

2. **Comments: (i)- For each element in Requirements 2.1 to 2.7, we suggest to replace the word "commitment" with "obligation" Obligation is a stronger word.**  
**(ii)- 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 2.1.3 and 2.1.12 be modified by changing "construction plans" to "outage plans". Construction plans will typically come from the transmission owner directly or through the transmission operator.**  
**(iii)- Requirement R1.1 requires the TOP to "train" their operators and ensure they "understand" their obligations and responsibilities. The use of the word "understand" is too subjective. If the intend is to "test" operators to ensure they understand the requiriement, it should say that.**  
**(iv). There is no mention of reactive support from Transmission Owners. These owners have capacitor banks and reactors that are vital in support system voltage. We suggest to include this as an agreement requirement within this standard.**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

## Comment Form Proposed Transmission Operator Certification Standard

---

### Comments:

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

Comments: (i)- Requirement 1 - "periodicity of transmittal" and "time frame" appear to mean the same thing.

(ii)- We recommend that Requirements 2.6 and 3.2 be modified by changing the terminology "construction plans" to "outage plans".

(iii)- In order to be consistent with the content and intent of this certification standard, the wording in the Purpose section needs to be modified to include more than real-time data (e.g. generator maintenance plan, transmission maintenance plans, etc).

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

3. **Comments: Requirement 1 - Indicate whose operating personnel are to be alerted.**

## Comment Form Proposed Transmission Operator Certification Standard

---

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

Comments: (i)- The entity seeking certification must have the capability to continue operations during emergency conditions. The entity must have a communication protocol in place to allow other transmission entities to communicate vital information via more than one communication media. This needs to be clearly reflected/updated in the standard.

(ii)- re: R1: It needs to be indicated that TOP's processes and directing the actions are applicable to Generator Operators(s), Transmission Owner(s), Load Serving entities and Distribution Provider(s). It should be consistent with ORG-002 (TOP Certification- Agreements)

(iii)- Requirement R1.2, "Is experiencing an actual Emergency" is very broad and vague. The term Emergency needs to be defined and tied to a common reference so this requirement can be implemented consistently across all TOPs.

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

Comments: (i)- Requirement 1 needs to state a minimum time required to activate the backup plan including continued operation with the functions identified in Requirement 2. Without a minimum time a TOP could be compliant even if it took 24 hours.

(ii)- If the TOP's primary facility becomes unavailable the TOP's responsibilities will need to be taken over by another "physical" facility. This physical back up facility could be a full back up center, a shared back up center, contracting with another entity, etc. The plan for continued operation should require identifying the TOP's physical plan for a back up control center.

## Comment Form Proposed Transmission Operator Certification Standard

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(iii)- The existing version-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. This requirement needs to be mapped this proposed ver-1 standard.

(iv)- re: R1: The foot note statement related to SCADA (voice ....) is confusing. The footnote needs to be clarified and/or reworded.

(v)- With regards to R-2.3, the requirement to acquire construction plans, it would be better phrased as "outage plans".

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

Comments: There may be a need to included a minimum list of items that need to be included in the TOP restoration plan

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

4. Comments: (i)- We have a general concern with regard to the existing NERC Registration Process and the ultimate Certification Process. The concern regards the consistency, terminology or the various interpretations within the industry of what constitutes an TOP. We believe that clarity shall be established prior to ultimate certification. Our understanding is that various issues are under consideration at the Functional Model Working Group and we would ask that guidelines be developed and included in the revised Functional Model and be included in the implementation plan for the TOP Certification Standard.

(ii)- With regards to the definition of the Agreement, we recommend that following wording should be used for the proposed statement/definition of Agreement, i.e. "For purposes of applying the term 'Agreement' within this standard it shall mean a contract or other document delineating an arrangement that expresses assent and or obligation by two or more parties to the same object. This arrangement determines a course of action to be followed by all parties involved in the situation. The key components of the agreement must identify the ability, intent, and authority of the parties. The requirement for an agreement can be satisfied in a variety of ways, including but not limited to: contracts, designation of authority documents, market rules, policies, and procedures.

(iii)- It is expected that audits will be conducted for these standards. In that case, we suggest that a retention period for any audit records and results be specified.

## **Comment Form Proposed Transmission Operator Certification Standard**

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**(iv)- Moreover, the implementation and application of this standard in terms of coordination with other Functional Model related entities should need to allow for a transition period until the FM related entities are either fully registered or certified. Moreover, these entities (such as GOP, DP, etc.) need to be clearly defined and registered/certified.**

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

**Comments:**

**Comment Form Proposed Transmission Operator Certification Standard**

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
Email:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities
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<input type="checkbox"/> WECC	<input type="checkbox"/>	
<input type="checkbox"/> NA - Not Applicable	<input type="checkbox"/>	



## **Comment Form Proposed Transmission Operator Certification Standard**

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The Certification Standard Drafting Team would like to receive industry comments on this group of standards. Accordingly, we request your comments included on this form, emailed with the subject "TOP Certification Standards Comments" by **July 1, 2005**.

## Comment Form Proposed Transmission Operator Certification Standard

---

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**1. Comments: Requirements 1 and 5 are redundant. We suggest that R5 should be deleted.**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

- 2. Comments: (i)- For each element in Requirements 2.1 to 2.7, we suggest to replace the word "commitment" with "obligation" Obligation is a stronger word.**  
**(ii)- 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 2.1.3 and 2.1.12 be modified by deleting/dropping "construction plans". Construction plans will typically come from the transmission owner directly or through the transmission operator.**  
**(iii)- Requirement R1.1 requires the TOP to "train" their operators and ensure they "understand" their obligations and responsibilities. The use of the word "understand" is too subjective. If the intend is to "test" operators to ensure they understand the requirement, it should say that, or just leave it as a requirement to provide training on the subjects.**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

## Comment Form Proposed Transmission Operator Certification Standard

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments: (i)- Requirement 1 - "periodicity of transmittal" and "time frame" appear to mean the same thing.**

**(ii)- We recommend that Requirements 2.6 and 3.2 be modified by deleting terminology "construction plans".**

**(iii)- In order to be consistent with the content and intent of this certification standard, the wording in the Purpose section need to be modified to include more than real-time data (e.g. generator maintenance plan, transmission maintenance plan, etc).**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

- 3. Comments: Requirement 1 - Indicate whose operating personnel are to be alerted.**

## Comment Form Proposed Transmission Operator Certification Standard

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

Comments: (i)- The entity seeking certification must have the capability to continue operations during emergency conditions. The entity must have communication protocols in place to allow other transmission entities to communicate vital information via more than one communication media. This needs to be clearly reflected/updated in the standard.

(ii)- re: R1: It needs to be indicated that TOP's processes and directing the actions are applicable to Generator Operators(s), Transmission Owner(s), Load Serving entities and Distribution Provider(s). It should be consistent with ORG-002 (TOP Certification- Agreements)

(iii)- Requirement R1.2, "Is experiencing an actual Emergency" is very broad and vague. The term Emergency needs to be defined and tied to a common reference so this requirement can be implemented consistently across all TOPs.

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

Comments: (i)- Requirement 1 needs to state a minimum time required to activate the backup plan including continued operation with the functions identified in Requirement 2. Without a minimum time an TOP could be compliant even if it took 24 hours.

(ii)- If the TOP's primary facility becomes unavailable the TOP's responsibilities will need to be taken over by another "physical" facility. This physical back up facility could be a full back up center, a shared back up center, contracting with another entity, etc. The plan for continued operation should require identifying the TOP's physical plan for a back up control center.

**Comment Form Proposed Transmission Operator Certification Standard**

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(iii)- The existing version-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 standard.

(iv)- re: R1: The foot note statement related to SCADA (voice ....) is confusing. The footnote needs to be clarified and/or reworded.

(v)- With regards to R-2.4, the requirement to have provision/coordination of construction plans with RC can be construed as business continuity requirement rather than a back up control center requirement. We suggest deleting the construction plan related requirement from this standard.

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments: There may be a need to included a minimum list of items that need to be included in the TOP restoration plan**

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

**4. Comments: Additional Comments:**

(i)- The ISO/RTO Council has a general concern with regard to the existing NERC Registration Process and the ultimate TOP Certification Process. The concern regards the consistency, or lack thereof, of TOP registrations already performed, and the various interpretations within the industry of what constitutes a TOP. The ISO/RTO Council believes that guidelines must be established that provide consistency in registration and ultimately certification. Our understanding is that these issues are under consideration at the Functional Model Working Group and we would ask that these guidelines be developed and included in the revised Functional Model or be included in the implementation plan for the TOP Certification Standard.

(ii)- With regards to the definition of the Agreement, we recommend that following wording should be added in the beginning of the proposed statement/definition of Agreement i.e. “For purposes of applying the term ‘Agreement’ within this standard it shall mean.....”

(iii)- It is expected that audits will be conducted for these standards. In that case we suggest that data retention period for any audit results be specified.

## **Comment Form Proposed Transmission Operator Certification Standard**

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**(iv)- Moreover, the implementation and application of this standard in terms of coordination with other Functional Model related entities should need to allow for a transition period until the FM related entities are either fully registered or certified. Moreover, these entities (such as GOP, DP, etc..) need to be clearly defined and registered/certified before the implementation of this certification standard.**

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

**Comments:**

**Comment Form Proposed Transmission Operator Certification Standard**

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
Email:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities
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## **Comment Form Proposed Transmission Operator Certification Standard**

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The current draft reflects the industry's comments on the SAR, industry comments on any prior drafts, and any comments, that were relevant to the class of certification standards, received during prior postings. Additional changes were made in the drafting of the standard to reflect the revisions made to the Functional Model since the drafting of the SAR.

The Certification Standard Drafting Team would like to receive industry comments on this group of standards. Accordingly, we request your comments included on this form, emailed with the subject "TOP Certification Standards Comments" by **July 1, 2005**.

## Comment Form Proposed Transmission Operator Certification Standard

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

1. **Comments: Standard ORG-001-1 appears to be more of a procedure than a standard. We suggest that it be eliminated and replaced with a NERC administrative procedure. If this is not a practical change, then perhaps a better way to develop these certification standards is to reference the various standards that truly apply and not list each specific task that is required. Having a list may lead to the standards being changed at different times and the two getting out of synch with each other.**
2. **R1, R4 and R5 appear to be standards that say to be certified you must meet the standards. This seems to be both unnecessary and confusing. We suggest that R1 be rephrased to say that the applicant must demonstrate that he has the tools, facilities and trained personnel to required to meet the relevant NERC standards, not that he is currently meeting them. R4 and R5 should be eliminated.**
3. **R1 – Some of these conditions seem impractical as specified. For example the footnote for “Loss of Communications” indicates it is a loss of all forms of communications except SCADA. It does not say primary communications, it says all. That would imply primary and all forms of alternate communications methods. There is no entity that could survive that condition cleanly especially with respect to some of the items required in R2 such as R2.8 where there would be no way to “direct” anything without any communications mechanisms. A similar situation is true for “Loss of control center support functions”. It does not say primary functions, it implies “all” by the omission of any qualifiers. The conditions need to be more specifically defined. Part of this specification needs to consider the length of time the condition is to be survived. Answers will differ depending, for example, on the assumption being 2 hours versus two days.**
- R2.14 – “Calculation and reporting” of what in according to NERC standards is to take place? The requirement is unclear.**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments: General - The requirements of ORG-002-1 are simply restatements of**

## Comment Form Proposed Transmission Operator Certification Standard

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existing NERC Standard requirements. As such, they introduce the potential for the NERC Standards to get out of synchronization and provide contradictory information. It would be much better for the Organizational Certification Standards to reference the requirements of existing NERC Standards and state that the organization requesting certification should provide documentation proving that they have agreements in place to meet the requirements of the referenced standards.

**R.2.4.1 This may be limited by the Interconnection Agreement**

**R.2.5 change "and" to "or"**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments: Same general comment as for Question No. 2 above.**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments: The requirements of ORG-004-1 are both prescriptive and incomplete. They provide detailed information on certain system parameters to be monitored yet are incomplete in that they can not possibly cover all potential conditions that might arise in actual operational conditions. We suggest that this be modified to state the functional requirements for monitoring transmission system reliability, as stated in existing NERC Standards, and that the certification audit team be charged with determining if the candidate transmission operator has sufficient tools and monitoring points to accomplish the specified reliability functions. This solution also has the advantage of permitting technical improvements that might change the particular set of system parameters to be monitored while accomplishing the functional reliability requirements, perhaps with**

## Comment Form Proposed Transmission Operator Certification Standard

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better results and at a reduced cost.

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments: We suggest that ORG-005-1 be modified to state the functional requirements for analysis of transmission system reliability, as stated in existing NERC Standards, and that the certification audit team be charged with determining if the candidate transmission operator has sufficient tools, training and procedures to accomplish the specified reliability functions. As in Question No. 4 above, this solution has the advantage of permitting technical improvements that might change the particular set of system tools or analytical procedures to be performed while accomplishing the functional reliability requirements, perhaps with better results and at a reduced cost.**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments: Same general comment as for Question No. 2 above.**

## **Comment Form Proposed Transmission Operator Certification Standard**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments: Same general comment as for Question No. 2 above.**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments: Same general comment as for Question No. 2 above.**

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

**Comments: These standards apparently attempt to set up a "check list" for transmission operator certification. While that is certainly one approach to certification, it introduces duplication of requirements in the standards and sets up the potential for the NERC Standards to get out of synchronization and provide contradictory information. Another approach is for the Organizational Certification Standards to reference requirements of existing NERC Standards and require the organization requesting certification to provide proof that they can meet these requirements. This basically means that the certification requirements are not standards in and of themselves, but procedures that the certification audit team follows to ensure that the candidate transmission operator can demonstrate its ability to meet the NERC Reliability Standards. We believe that this is a better approach and request that the ORG standards be withdrawn as candidate NERC reliability standards and further developed as procedures, perhaps by the Compliance and Certification Committee. We**

**simply feel that this does not have to be a stand-alone standard.**

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

**Comments:**

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Organization:		
Telephone:		
Email:		
NERC Region		Registered Ballot Body Segment
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## Comment Form Proposed Transmission Operator Certification Standard

---

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

1. **Comments: There is no mention of reactive support from Transmission Owners. These owners have cap banks and reactors that are vital in support system voltage.**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

## **Comment Form Proposed Transmission Operator Certification Standard**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

**Yes**

**No**

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

**Yes**

**No**

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

**Yes**

**No**

**Comments: Yes, the entity seeking certification must have the capability to continue operations during emergency conditions. The entity must have communication protocol in place to allow other transmission entities to communicate vital information via more than one communication media. The transmission operator must be able to take actions up to and including**

## Comment Form Proposed Transmission Operator Certification Standard

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shedding of firm load when directed by the Reliability Coordinator. This needs to be updated/included in standard.

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:** The entity seeking certification has to have the procedures processes tools and facilities to continue to operate according to NERC standards in the event of loss of its control centre. The standard requires an update.

The existing version-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 standard.

re: R1: The foot note statement related to SCADA (voice ....)is confusing. The footnote needs to be clarified and/or reworded.

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

9. **Please identify any elements that should be included in the standards that have not been identified?**
  
2. **Comments: Additional Comments:** With regards to the definition of the Agreement, we recommend that following wording should be added in the beginning of the proposed statement/definition of Agreement i.e. “For purposes of applying the term ‘Agreement’ within this standard it shall mean.....”
3. **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.**
4. **It is expected that audits will be conducted for these standards. In that case we suggest that data retention period be specified.**
5. **We recommend that the proposed standards be thoroughly reviewed and reassessed by the SDT based on the outcomes and resolutions of existing registration and any Functional Model updates and revisions.**
6. **Moreover, the implementation and application of this standard in terms of coordination with other Functional Model related entities should need to allow for a transition period until the FM related entities are fully certified. Moreover, these entities ((such as GOP, DP, etc..)) be clearly defined and certified before the implementation of this certification standard.**
7. **Also, for this Standard and all the Certification Standards it is important to clarify that Certification will be done only to meet this standard and not the Functional Model. Any changes to the Functional Model must be reflected in this standard by revision through the Reliability Standards Process.**

**Comment Form Proposed Transmission Operator Certification Standard**

---

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

**Comments:**

**Comment Form Proposed Transmission Operator Certification Standard**

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



## **Comment Form Proposed Transmission Operator Certification Standard**

---

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Functional Model and Related Documents: <http://www.nerc.com/~filez/functionalmode.html>

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The Certification Standard Drafting Team would like to receive industry comments on this group of standards. Accordingly, we request your comments included on this form, emailed with the subject "TOP Certification Standards Comments" by **July 1, 2005**.

## Comment Form Proposed Transmission Operator Certification Standard

---

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

1. **Comments: Requirement R2.1.6.1. states that a Transmission Operator will Provide notification of transmission system problems that may affect generator operation to Generator Operators. This action could be construed as a code of conduct violation. Perhaps a better way to state this is R2.1.6.1. Provide notification to Generator Operators of transmission system emergencies that threaten reliability and affect generator market operation in accordance with the FERC code of conduct.**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments: Requirement R1.1. states that the Tasks considered real-time Transmission Operator responsibilities include:**

**Monitor, operate or direct the operations of the transmission system withinequipment and facility ratings.**

**Deploy reactive resources to maintain acceptable voltage profiles.**

**Notify Generator Operators of transmission system problems.**

**Request Reliability Authority Reliability Coordinator to mitigate equipment overloads.**

**Coordinate load shedding with, or as directed by, the Reliability Coordinator.**

**Direct Distribution Providers to shed load.**

**Implement DC tie operations**

**These tasks should be the same as the Real Time Transmission Operator Tasks listed in the Functional Model in effect at the time this standard is effective.**

**R2 states that the TOP will provide training on procedures etc. This requirement should state The Transmission Operator shall provide its operating personnel with training that addresses the maintenance of the certification credential applicable to the Transmission Operations function and all of the procedures, processes, and tools associated with performing the Transmission Operator responsibilities identified in Requirement R1.**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

**Yes**

**No**

**Comments: Requirement R2 states that The Transmission Operator shall have procedures, processes, and tools for acquiring: (the list of items) including Status of automatic voltage regulator. Is it NERC's intent to require telemetering of the status of the generator AVRs? If not, then this should be revised to The Transmission Operator shall have procedures and processes, including appropriate tools for acquiring:**

## Comment Form Proposed Transmission Operator Certification Standard

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

Comments:

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

Comments:

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

Comments: Requirement R2 appears to imply that a TOP must have redundant EMS capability. Is it NERC's intent that every TOP must have or arrange for a duplicate control center with live real time data available at all times to the control center and the Reliability Coordinator?

## **Comment Form Proposed Transmission Operator Certification Standard**

---

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

**Yes**

**No**

**Comments:**

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

**Comments: There needs to be a consideration made that addresses the TOP function in entities, such as RTO's similar to PJM, where there are shared responsibilities in the TOP area. An alternative might be to include a second tier of TOP in the NERC Functional Model, similar to the RA and TOP functions originally envisioned in the model. This approach would address those shared responsibilities that involve voltage levels, monitored facilities, definitions of bulk power, existing agreements, methods for historically assuring reliable operations, and alignment with the existing Version 0 standards.**

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

**Comments:**

**Comment Form Proposed Transmission Operator Certification Standard**

---

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	David Hawkins	
Organization:	Western Electricity Coordinating Council	
Telephone:	916-351-4465	
Email:	DHawkins@caiso.com	
NERC Region	Registered Ballot Body Segment	
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners	
<input type="checkbox"/> ECAR	<input checked="" type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils	
<input type="checkbox"/> FRCC	<input type="checkbox"/> 3 - Load-serving Entities	
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<input type="checkbox"/> NA - Not Applicable		



## **Comment Form Proposed Transmission Operator Certification Standard**

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The Certification Standard Drafting Team would like to receive industry comments on this group of standards. Accordingly, we request your comments included on this form, emailed with the subject "TOP Certification Standards Comments" by **July 1, 2005**.

## Comment Form Proposed Transmission Operator Certification Standard

---

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

1. **Comments: Why is it necessary to "demonstrate" capability. Does it significantly add to reliability?? We do not believe that it does. We have never had this requirement before and, as far as we know, reliability has not suffered. Until now, it has been sufficient for the certification team and approval bodies to assure themselves that a candidate TOP has knowledge of the requirements. And, knowing was is expected, the candidate will acquire the equipment and create the agreements to become compliant as a TOP Responsible Entity.**

**The word "demonstrate" creates problems for the candidate TOP as well as the certification team. For the candidate, how does the candidate show its ability to perform until it is part of the network? No trials here. For the certification team, when is the demonstration sufficient?**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments: Item R2.1.6 – The meaning is not clear as to what it means to "Operate the transmission system within the generator facility ratings." We can certainly understand operating the transmission system to stay within the transmission facility ratings, but it is not obvious what the operating constraint is due to generator facility ratings.**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

## Comment Form Proposed Transmission Operator Certification Standard

---

No

**Comments: Item R1.1 – “Request Reliability Coordinator to mitigate equipment overloads”. In WECC, the Transmission Operator is expected to analyze equipment overloads and to work with the BA to mitigate equipment overloads. Only if the TO does not take effective action to mitigate the problem within a reasonable time will the Reliability Coordinator take action and give a directive to the TO and BA to mitigate the problem by dropping load or ramping generation. This is probably a regional difference in the Western Interconnection.**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments: Item R2 – Although this item covers both generation and transmission data, there is no requirement for up to date load data, maintenance of load models or for load forecasts. With out good load data and load forecasts, it is not possible to perform the required analytical studies.**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments: Item R1 – Recommend changing “...alert operating personnel to limit violations”, to “...alert operating personnel to actual and potential limit violations.”**

## **Comment Form Proposed Transmission Operator Certification Standard**

---

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments: Item M1 – We do not agree with the measure and it will be interesting to see how the Tos chose to demonstrate their ability to operate during Emergency conditions.**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments: No Comments**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments: No Comments**

## **Comment Form Proposed Transmission Operator Certification Standard**

---

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

**Comments: General comment: NERC Transmission Operator Certification should be limited to those entities that are operating transmission facilities that are a minimum of 100 kV and above and these facilities are a part of the interconnected grid. Transmission facilities below 100 kV are generally considered sub-transmission and are not considered critical transmission facilities in WECC. We do not believe the operators of these sub-transmission facilities need to be NERC certified as Transmission Operators unless they are direct ties with their adjacent system.**

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

**Comments:**

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<b>Individual Commenter Information</b>		
<b>(Complete this page for comments from one organization or individual.)</b>		
Name:	Terry L. Blackwell	
Organization:	South Carolina Public Service Authority (SCPSA)	
Telephone:	843-761-8000, ext 5196	
Email:	tblackw@santeecooper.com	
<b>NERC Region</b>	<input type="checkbox"/>	<b>Registered Ballot Body Segment</b>
<input type="checkbox"/> <b>ERCOT</b>	<input checked="" type="checkbox"/>	1 - Transmission Owners
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1. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Certification standard?

Yes

No

**Comments:** The proposed ORG Standards appear to define processes by which organizations are certified along with associated requirements that duplicate or restate requirements included in other NERC Standards. In addition, the proposed standards also appear to be a potential forum to establish new requirements not already included in other NERC Standards. SCPSA believes that the overall process of certifying organizations should not be developed through the NERC standards process; rather, organization certification processes and procedures should be developed and maintained, with industry input, by NERC and the regions along with other processes and procedures that are currently maintained outside of the standards process.

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

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

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

Yes

No

**Comments:**

## **Comment Form Proposed Transmission Operator Certification Standard**

---

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

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

Yes

No

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

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Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

## **Comment Form Proposed Transmission Operator Certification Standard**

---

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

Yes

No

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

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

**Comments:**

**Comment Form Proposed Transmission Operator Certification Standard**

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

**Comments:**

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

<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
Email:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/>	5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users
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<input type="checkbox"/> WECC	<input type="checkbox"/>	
<input type="checkbox"/> NA - Not Applicable	<input type="checkbox"/>	



## **Comment Form Proposed Transmission Operator Certification Standard**

---

The Standard Drafting Team developed the TOP Certification Standards based on the scope outline in the related SAR, the Reliability Functional Model, and the Version 0 Reliability Standards. The reader may find it useful to review these documents to help understand the Standard Drafting Team's philosophy in creating this group of standards. The documents can be accessed at the following links:

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The Certification Standard Drafting Team would like to receive industry comments on this group of standards. Accordingly, we request your comments included on this form, emailed with the subject "TOP Certification Standards Comments" by **July 1, 2005**.

## Comment Form Proposed Transmission Operator Certification Standard

---

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

**We have the following comments and suggestions:**

**R2 states the entity seeking certification shall adhere to the requirements of the "NERC Certification Process for Transmission Operators." Please add that Certification Process to this standard since that Process is part of the Certification Process.**

**R3 contains the statement "The entity, to which a task is delegated, shall be subject to review." "Review" by whom? Or what? Will this entity also be required to adhere to the unspecified "NERC Certification Process for Transmission Operators"?**

**M3 is a Requirement for the RRO. It is not a Measure. Please move M3 to the Requiriementns section and add a requiremnet that Measures the RRO performance for administering this TOP Certification Standard.**

**Please add a statement indicating "who" will be conducting the "on-site" review, which we expect is part of the Certification Process above.**

**In R7 concerning the "on-site" visit, please replace "Transmission Operator's control center facilities" by "control center facilities of the entity seeking Transmission Operator Certification."**

**In Sections A and B.R.1, please replace "transmission operation functions" with "transmission operation functions as specified in the Standards."**

## Comment Form Proposed Transmission Operator Certification Standard

---

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

1. **Comments:**

2.

3. **We have the following comments and suggestions:**

4.

5. **R1 places requirements on the TOP and its personnel concerning the NERC Confidentiality Agreement and the NERC Standards of Conduct. Please add a Requirement that any entity to whom the TOP delegates tasks, and its personnel, must execute the NERC Confidentiality Agreement and the NERC Standards of Conduct.**

6.

7. **R2 requires "agreements" but does not specify with whom. Please add the following to the first sentence of R2: " .. shall have agreements ( add - "with each of the following entities" ) that define the ... ".**

8.

9. **Please delete all requirements R2.1 through R2.9 since they specify details of the agreements between the TOPs and the entities. In addition, add the following statement to the last sentence of R2 - " ... for the defined Transmission Area (delete - "that addresses:") (add - "such that all entities meet the NERC Reliability Standards.")".**

10.

11. **If it is decided to not delete the requirements R2.1 through R2.9 then please add a specific reference that identifies each specific NERC Standard and Requirement that requires the information detailed in that requirement.**

12.

13. **If it is decided to not delete the requirements R2.1 through R2.9 then please delete "R2.5 The Distribution Provider's commitment to implement voltage reduction and shed load" since this is not a NERC Standards Requirement. These word are contained in the Functional Model V2 but are not required in the NERC Standards.**

14.

15. **Requirement IRO-001 R8 contains the statement:**

16.

17. **"Transmission Operators, Balancing Authorities, Generator Operators,**

## Comment Form Proposed Transmission Operator Certification Standard

---

### Transmission Service

18. Providers, Load-Serving Entities, and Purchasing-Selling Entities shall comply with Reliability
19. Coordinator directives unless such actions would violate safety, equipment, or regulatory or
20. statutory requirements."
- 21.
- 22.
23. If it is decided to not delete the requirements R2.1 through R2.9 then please add the above Requirement to all the appropriate entities included in R2.1 through R2.9, including the last part of the statement " .. unless such actions would violate safety, equipment, regulatory or statutory requirements .. ".
- 24.

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

3. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Personnel standard?  
 Yes  
 No

Comments:

We have the following comments and suggestions:

Requirement R1 places a greater requirement on the TOP than the existing Standards. Therefore, Requirement R1 for this Personnel Standard should be replaced by: "The Transmission Operator shall demonstrate how it meets Standard PER-003 R1."

Please delete R1.1. It is an incomplete list of the TOP Real-Time activities taken from the Functional Model "Transmission Operator - Relationships with other Responsible Entities". R1.1 is not a list of the TOP tasks that are performed by NERC-certified TOP personnel.

## Comment Form Proposed Transmission Operator Certification Standard

---

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

**The Standards detail the information required by the TOP and its interaction with those in its TOP Area and others. There is no need for this Certification Standard to provide any list, especially a partial list, of requirements. Therefore please replace all of Requirement R2 with "The TOP shall have procedures, processes, and tools in place to accomplish the data transfers specified in R1."**

**We suggest deleting R3 as it is repetitive of R2. If it is not deleted then please replace all of Requirement R3 with: "The TOP shall have procedures, processes, and tools in place to accomplish the data transfers with the RC and others as required."**

**Also, please make changes to the Measures as needed to accommodate the changes suggested above.**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments: However, we would really prefer R1 be replaced by a general statement that the TOP is required to show how it meets the NERC Standards.**

## Comment Form Proposed Transmission Operator Certification Standard

---

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

Comments:

We suggest deleting the last part of the sentence of R1 "that address when the Transmission Operator:" and also delete all items R1.1 through R1.5.

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

Comments: Please delete all of the itemized list in R2.

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

Comments:

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

**25. Comments:**

**26.**

**27. We have the following comments and suggestions:**

**28.**

**29. In these standards, no process exists for the possibility of being de-certified after the initial certification. If this process exists separately from this set of standards, then these standards should point to that process. If it does not exist elsewhere, then these standards should be modified to allow for that possibility.**

**30.**

**31. Please modify these Certification Standards to reference specific existing Standards requirements and delete all restatements or rewording of those Standards requirements in these Certification Standards. These Certification Standards should require the TOP to prove how it meets the requirements of the existing Standards. It should not be imposing new requirements on the TOP, or providing the opportunity for new requirements to be imposed on the TOP.**

**32.**

**33. Grammatically, more use of possessive nouns would be appreciated; some standard requirement sections contain wording that appears to place requirements on entities other than the TOP.**

**34.**

**35. Please add a provision for periodic on-site reviews of TOPs to ensure they continue to meet Certification Standard requirements.**

**36.**

**Please add provisions for de-certification of TOPs, for both self-decertification and de-certification for cause.**

**Comment Form Proposed Transmission Operator Certification Standard**

---

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

**Comments:**

**Comment Form Proposed Transmission Operator Certification Standard**

---

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Robert Coish	
Organization:	Manitoba Hydro	
Telephone:	1-204-487-5479	
Email:	rgcoish@hydro.mb.ca	
NERC Region	Registered Ballot Body Segment	
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils
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<input type="checkbox"/> WECC		
<input type="checkbox"/> NA - Not Applicable		



## **Comment Form Proposed Transmission Operator Certification Standard**

---

The Standard Drafting Team developed the TOP Certification Standards based on the scope outline in the related SAR, the Reliability Functional Model, and the Version 0 Reliability Standards. The reader may find it useful to review these documents to help understand the Standard Drafting Team's philosophy in creating this group of standards. The documents can be accessed at the following links:

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The current draft reflects the industry's comments on the SAR, industry comments on any prior drafts, and any comments, that were relevant to the class of certification standards, received during prior postings. Additional changes were made in the drafting of the standard to reflect the revisions made to the Functional Model since the drafting of the SAR.

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## Comment Form Proposed Transmission Operator Certification Standard

---

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

- Yes  
 No

**Comments: R5 appears to be redundant with R1. Add RRO to R5 to make it clear who is responsible for the requirement**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

- Yes  
 No

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

- Yes  
 No

**Comments: (1)In Purpose add words "as required by NERC Reliability Standards" after "trained". (2)In R1.1 add "and system ratings" at the end of the first bullet .**

## Comment Form Proposed Transmission Operator Certification Standard

---

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments: (1) In R3.1 "Transmission Operator Area information" is vague - insert words "as required by NERC Reliability Standards" after this phrase. (2) In R3.3 "Coordinate with adjacent Transmission Operators" is vague - insert words "as required by NERC Reliability Standards" after this phrase.**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments: (1) In the Purpose add the words "as required by NERC Reliability Standards" after "has the ability". (2) In M1 add the words "can demonstrate that it can use it's" after "and"**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

## Comment Form Proposed Transmission Operator Certification Standard

---

**Comments:** M1 refers to use of tools but R1 does not. For example, the TO must have tools to mitigate an IROL violation.

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:** Elaborate on "single occurrence". For example, a fire in the Control Centre building could result in the need to evacuate plus loss of other listed items. Should the entity not be required to continue to operate in this situation? Also, care should be taken not to create new requirements in this standard that are not included in existing NERC standards. This is a case where simple reference to the NERC Reliability Standards is appropriate. For example, the requirements of ORG-006-1 may not be consistent with approved Version 0 Standard EOP-008-0.

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:** In R1 add the words "that complies with NERC Reliability Standards" after "restoration plan"

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

**Comments:** As a general comment here is a risk that the capability requirements stated specifically in the Transmission Operator Certification Standards will not agree with the capability requirements needed to comply with the full set of NERC Reliability requirements. The Certifications standards should be written to automatically accommodate any differences with existing standards in this regard or to automatically accommodate any new capability requirements that may arise during the ongoing standards development process. A solution to this might be to state that where differences exist between the Certification Standard and other Reliability Standards, the Requirements in the other standards will apply. This will put the Certification standards on firmer legal ground. Also, the Certification standards will only need to be updated periodically and not every time a related changes are made to other standards.

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

**Comments:** None identified

**Comment Form Proposed Transmission Operator Certification Standard**

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## Comment Form Proposed Transmission Operator Certification Standard

---

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

- Yes  
 No

**Comments: As written the standard is not specific on whether the certification process is a one-time event or must be repeated on a periodic basis. Readiness audits should be sufficient to maintain certification and therefore repeated certification is not required. Results of previous audits should be factored into the certification process as much as possible.**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

- Yes  
 No

**Comments: Requirement R2.1.6.1 may be in direct conflict with the FERC Code of Conduct. The requirement should be limited to what is allowed under the Code of Conduct.**

**Requirement R2.7 should have a third bullet for coordinating voltage.**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

- Yes  
 No

**Comments: The third bullet under Requirement R1.1 may be in direct conflict with the FERC Code of Conduct. The requirement should be limited to what is allowed under the Code of Conduct.**

## Comment Form Proposed Transmission Operator Certification Standard

---

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments: Requirement R3 should be more specific regarding the types of actions that need to be reported to the Reliability Coordinator? As stated, the requirement is too broad and all inclusive.**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

## **Comment Form Proposed Transmission Operator Certification Standard**

---

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments: The requirement in R1 is not clear on whether the loss is for all functionality or restricted to the loss of primary systems only. It is assumed that the intent is for the loss of primary functionality only and redundant or backup systems could be used to meet this requirement.**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

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

**Comments:**

**Comment Form Proposed Transmission Operator Certification Standard**

---

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

**Comments:**

**Comment Form Proposed Transmission Operator Certification Standard**

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<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	Michael C. Calimanoe
Organization:	New York ISO
Telephone:	518-356-6129
Email:	mcalimano@nyiso.com
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
<input type="checkbox"/> ECAR	<input checked="" type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/> 3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/> 4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/> 5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/> 6 - Electricity Brokers, Aggregators, and Marketers
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/> 7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/> 8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/> 9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	
<input type="checkbox"/> NA - Not Applicable	



## **Comment Form Proposed Transmission Operator Certification Standard**

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The Standard Drafting Team developed the TOP Certification Standards based on the scope outline in the related SAR, the Reliability Functional Model, and the Version 0 Reliability Standards. The reader may find it useful to review these documents to help understand the Standard Drafting Team's philosophy in creating this group of standards. The documents can be accessed at the following links:

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Functional Model and Related Documents: <http://www.nerc.com/~filez/functionalmode.html>

The current draft reflects the industry's comments on the SAR, industry comments on any prior drafts, and any comments, that were relevant to the class of certification standards, received during prior postings. Additional changes were made in the drafting of the standard to reflect the revisions made to the Functional Model since the drafting of the SAR.

The Certification Standard Drafting Team would like to receive industry comments on this group of standards. Accordingly, we request your comments included on this form, emailed with the subject "TOP Certification Standards Comments" by **July 1, 2005**.

---

**Comment Form Proposed Transmission Operator Certification Standard**

---

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

**Yes**

**No**

**Comments:**

**Is this a one time certification or is there a requirement for periodic recertification?**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

**Yes**

**No**

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

**Yes**

**No**

**Comments:**

## **Comment Form Proposed Transmission Operator Certification Standard**

---

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

**Yes**

**No**

**Comments:**

**What is the difference between "periodicity of transmittal" and "time frame"?**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

**Yes**

**No**

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

**Yes**

**No**

**Comments:**

## **Comment Form Proposed Transmission Operator Certification Standard**

---

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

1. **Comments: Certified entities must have the capability and facilities to continue to operate according to NERC standards in the event of loss of its control center.**

**There should be a time frame associated with how soon the backup plan should be implemented**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

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

**Comments: The NYISO fully supports the elements identified in the ISO/RTO Council and NPCC Regional comments.**

**Comment Form Proposed Transmission Operator Certification Standard**

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

**Comments:**

**Comment Form Proposed Transmission Operator Certification Standard**

---

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

<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	Kathleen M. Goodman
Organization:	ISO New England
Telephone:	(413) 535-4111
Email:	kgoodman@iso-ne.com
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
<input type="checkbox"/> ECAR	<input checked="" type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/> 3 - Load-serving Entities
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## **Comment Form Proposed Transmission Operator Certification Standard**

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The Certification Standard Drafting Team would like to receive industry comments on this group of standards. Accordingly, we request your comments included on this form, emailed with the subject "TOP Certification Standards Comments" by **July 1, 2005**.

## Comment Form Proposed Transmission Operator Certification Standard

---

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

1. **Comments: There is no mention of reactive support from Transmission Owners. These owners have cap banks and reactors that are vital in support system voltage.**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

## **Comment Form Proposed Transmission Operator Certification Standard**

---

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

**Yes**

**No**

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

**Yes**

**No**

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

**Yes**

**No**

**Comments: Yes, the entity seeking certification must have the capability to continue operations during emergency conditions. The entity must have communication protocol in place to allow other transmission entities to communicate vital information via more than one communication media. The transmission operator must be able to take actions up to and including**

## Comment Form Proposed Transmission Operator Certification Standard

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shedding of firm load when directed by the Reliability Coordinator. This needs to be updated/included in standard.

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:** The entity seeking certification has to have the procedures processes tools and facilities to continue to operate according to NERC standards in the event of loss of its control center. The standard requires an update.

The existing version-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 standard.

re: R1: The foot note statement related to SCADA (voice ....) is confusing. The footnote needs to be clarified and/or reworded.

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

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

**2. Comments: We have a general concern with regard to the existing NERC Registration Process and the ultimate TOP Certification Process. The concern regards the consistency, or lack thereof, of TOP registrations already performed, and the various interpretations within the industry of what constitutes a TOP. We believes that guidelines must be established that provide consistency in registration and ultimately certification. Our understanding is that these issues are under consideration at the Functional Model Working Group+ and we would ask that these guidelines be developed and included in the revised Functional Model or be included in the implementation plan for the TOP Certification Standard.**

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

**Comments:**

**Comment Form Proposed Transmission Operator Certification Standard**

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

<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Noman Williams	
Organization:	Sunflower Electric Power Corporation	
Telephone:	785-623-3332	
Email:	nlwilliams@sunflwoer.net	
NERC Region	Registered Ballot Body Segment	
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 - Transmission Owners
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## **Comment Form Proposed Transmission Operator Certification Standard**

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## Comment Form Proposed Transmission Operator Certification Standard

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

1. **Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

2. **Comments: Comments by Sunflower Electric Power Corporation Regarding Draft #2 of the Transmission Operator Function Certification Requirements**

3. **July 5, 2005**

4. **Sunflower Electric Power Corporation (SEPC) is submitting the following comments to support the removal of the requirement that an entity applying to be certified as a Transmission Operator (TOP) under the NERC Functional Model must execute the “Operating Reliability Data (ORD) Confidentiality Agreement” referenced in Draft #2 of the TOP certification requirements.**

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

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

## Comment Form Proposed Transmission Operator Certification Standard

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the agreement. This standard also does not recognize those small entities that have a waiver from the FERC on the functional separation of their organization.

7. This draft requirement, if left in place, would prevent both G&T Cooperatives and municipal systems that have not signed the ORD agreement and are not functionally separated, from continuing to reliably operate their own transmission systems.
8. It has also come to our attention that the NERC Operating Committee on June 8 unanimously passed a motion that stated in very clear terms the following:
9. “The certification standard should not require that the Transmission Operator sign the data confidentiality agreement.”
10. The OC and its members from all segments of the electric utility industry have submitted this motion as comments in the TOP certification standard process. We fully endorse these OC comments and reiterate that all segments of the industry on the OC support removing the ORD agreement as a requirement to be certified as a TOP.
11. Finally, to date the draft ORD Confidentiality Agreement has not been included as a part of the draft certification requirement – it has only been referenced by the standard drafting team. We strongly believe that all documents and requirements necessary for certification as any Function under the NERC Functional Model should be a part of the standard drafting materials that are sent out for industry comments.

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

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

Comments:

## **Comment Form Proposed Transmission Operator Certification Standard**

---

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

**Yes**

**No**

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

**Yes**

**No**

**Comments:**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

**Yes**

**No**

**Comments:**

## **Comment Form Proposed Transmission Operator Certification Standard**

---

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments: This appears to require a back-up control center when other standards do not require this step**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments:**

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

**Comments:**

**Comment Form Proposed Transmission Operator Certification Standard**

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

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Neil Shockey	
Organization:	Southern California Edison	
Telephone:	626-302-4604	
Email:	neil.shockey@sce.com	
NERC Region	Registered Ballot Body Segment	
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 - Transmission Owners
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## Comment Form Proposed Transmission Operator Certification Standard

---

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

- Yes  
 No

**Comments: R2 references the NERC Certification Process for Transmission Operators. Where can this document be found for review?**

**Also, for R3 there is a potential problem as there are certain tasks that are accomplished mutually between a TOP and a BA, especially where there is an ISO and a tariff in place that allows this to occur. Entities can not be expected to change their operation to something arguably less reliable. As long as there is a clear delineation of duties as it relates to complying with each standard, either independently or through coordination, NERC's goal is being met.**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

- Yes  
 No

**Comments: R1 references the NERC Confidentiality Agreement. Where can this document be found for review? For R2, the NERC Functional Model, and entities defined within, does not align with an RTO/ISO structure. For R2.1.6.1, this requirement could be a problem from a FERC Standards of Conduct perspective. Sharing transmission information with generators who then communicate this information to their marketers is a violation of the FERC SOC.**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

- Yes  
 No

**Comments: For R1.1, same comment as above regarding FERC SOC concerns. Sharing**

## Comment Form Proposed Transmission Operator Certification Standard

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transmission information with generators who then communicate this information to their marketers is a violation of the FERC SOC. Also, under an RTO/ISO structure, the TO point of contact is the ISO, who in turn works with the RC, or vice versa for an RC request.

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments: For R2, suggest adding Power System Stabilizers (PSS) to this section. For R4, suggest adding or clarifying that interconnection data should be monitored as well.**

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

**Comments: For R1 and R2, it is unclear whether real time contingency analysis will be required. Suggest clarification in existing language.**

## Comment Form Proposed Transmission Operator Certification Standard

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

Comments:

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

1. Comments: For R1, suggest a footnote similar to footnote 1 clarifying loss of monitoring as the current language is too vague. It is recommended R2.1 be changed to read: Acquiring generation facility data, real-time operational data and generator maintenance outage plans. It is recommended R2.2 be changed to read: Acquiring transmission facility data, real-time operational data and maintenance outage plans. For R2.9, under an RTO/ISO structure, the TO point of contact is the ISO, who in turn works with the RC, or vice versa for an RC request.

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

Based on comments received during the 1<sup>st</sup> posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

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

Yes

No

## **Comment Form Proposed Transmission Operator Certification Standard**

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**Comments:** For R2, under an RTO/ISO structure the TO point of contact is the ISO, who in turn works with the RC, or vice versa for an RC request.

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

**Comments:**

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

**Comments:**