

Transmission Operator Certification Standard Draft 2 — Comments

Based on comments received during the 1st posting of the Transmission Operator Certification Standards, the Drafting team has made modifications to provide clarification to the standard.

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Manager of Standards, Mark Ladrow at 609-452-8060 or at mark.ladrow@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

1. Do you agree with the Introduction, Requirements, Measures, and compliance elements identified for **ORG-001-1 — Transmission Operator Certification — Certification?**

General Response: Industry consensus was not obtained in this posting. The drafting team has made modifications to the standard and will seek affirmation of these changes and seek industry consensus in the next posting.				
Commenter	Yes	No	Comment	Response
TOTAL:	12	13		
TVA Electric Systems Operations Kathleen A. Davis James Regg Chuck Owens Jerry Landers Bill Byrom Chris Donilon Chuck Feagans		X	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.	When the drafting team removed the process from the certification standard based on industry comments received, they felt compelled to retain a few key components that would require certifications to be completed in a consistent manner throughout the industry. The intent of the certification standards is to ensure that an entity has the process, procedures, and tools to meet the standards that are applicable to the function that they will perform. In order to accomplish this, the certification standards must be complimentary to the reliability standards and may appear to be redundant. In actuality, they are measuring two different elements, preparedness versus performance. As far keeping certification standards current with the reliability standards, it is a requirement of the standard's development process that any revisions or additional standards need to include a review of existing standards to identify any implications to these standards.
Michael C. Calimanoe – NY ISO	X		Is this a one time certification or is there a requirement for periodic recertification?	The intent is that this will be a one-time certification. The industry during the SAR process did not support periodic re-certification. The CCC is developing procedures to address the initial certification and all re-certification issues. This document is expected to be posted for industry review in the fall.
Operating Reliability Working Group Scott Moore – Southwest Power Pool		X	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	The intent is that this will be a one-time certification. The industry during the SAR process did not support periodic re-certification. The CCC is developing procedures to

¹ The appeals process is in the Reliability Standards Process Manual: <http://www.nerc.com/standards/newstandardsprocess.html>.

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Bob Cochran – SPS Allen Klassen – Westar Stan Mason – SPA Connie Ostermann – Westar Robert Rhodes - SPP			maintain certification and therefore repeated certification is not required. Results of previous audits should be factored into the certification process as much as possible.	address the initial certification and all re-certification issues. This document is expected to be posted for industry review in the fall.
Peter Burke (on behalf of Jason Shaver) – ATC	X		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?	The comments were forwarded to the CCC to consider in their development of the procedures. The CCC is developing procedures to address the initial certification and all re-certification issues. This document is expected to be posted for industry review in the fall and would reflect their response to the comments. We are anticipating that the procedures will be posted to obtain public comment. Administrative processes should not be standards.
Entergy Services, Inc – Transmission Ed Davis Rick Riley Jay Zimmerman Lynnda Eil Maurice Casadaban George Bartlett Jim Case Bill Aycock Melinda Montgomery Narinder Saini		X	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 Requirements section and add a requirement 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."	R2 - Based on industry comments, the process was removed and supported by the industry consensus. The CCC is developing procedures to address the initial certification and all re-certification issues. This process would be an administrative process and should not be a part of the standard. R3 – Wording has been added to the standard to clarify that this review will be performed in accordance with the NERC Certification Process for Transmission Operators. M3 – The standard has been modified to address industry concern. R7 has been deleted since it is an element of R6. The drafting team does not see any benefit to revising the wording regarding the transmission operation function.
Robert Coish – Manitoba Hydro		X	R5 appears to be redundant with R1. Add RRO to R5 to make it clear who is responsible for the requirement.	The standard has been modified to add RRO.
Midwest Reliability Organization Terry Bilke - MISO Robert Coish – MRO Ken Goldsmith – ALT Wayne Guttormson – SPC Todd Gosnell – OPPD Alan Boesch – NPPD Jim Maenner – WPS Darrick Moe – WAPA		X	(1) R5 appears to be redundant with R1. Add RRO to R5 to make it clear who is responsible for the requirement. (2) In the SDT's response to comments it was stated 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.	(1) The standard has been modified to add RRO. (2) The comments were forwarded to the CCC to consider in their development of the procedures. The CCC is developing procedures to address the initial certification and all re-certification issues. This document is expected to be posted for industry review in the fall and would reflect their response to the comments. We are anticipating that the procedures will be posted to obtain public comment and follow a process similar to the ANSI approved standards

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Tom Mielnik – MEC Dennis Florom – LES Joe Knight – MRO The 31 Additional MRO Members				process.
CP9 - NPCC Reliability Standards Working Group Ralph Rufrano – NY Power Authority Kathleen Goodman – ISO NE Roger Champagne Hydro Quebec TransEnergie Khaqan Khan – The IESO, Ontario Al Adamson – NY State Reliability Council David Little – Nova Scotia Power Greg Campoli – NY ISO Guy Zito – Northeast Power Coordinating Ccl.	X			
David Hawkins – Western Electricity Coordinating Council		X	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 what 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?	The drafting team does not understand the significance of this comment with regard to this question in the comment form since the word “demonstrate” is not present. The drafting team feels that in order to ensure that an entity seeking certification has the means to perform their required tasks, a demonstration of the tool in addition to having the knowledge is necessary. The industry supports this position.
Neil Shockey – Southern California Edison		X	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.	R2 - The CCC is developing the NERC Certification Process for Transmission Operators. This document is expected to be posted for industry review in the fall. R3 – As is stated in R3, the TOP may delegate tasks to another entity, but will retain the responsibility to ensure that the task is completed. For mutually accomplished tasks, it is still necessary that one of the entities be responsible for the completion of the task.
Ray Morella - FirstEnergy Corp	X			
FRCC Linda Campbell - FRCC Eric Senkowicz – FRCC Steve Wallace – Seminole Electric		X	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. "	The current wording in the standard in the Purpose, in conjunction with the Applicability inherently implies that the standard is for initial certification, but it may also be used for any type of re-certification that may be defined by the

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<p>Cooperative Alan Gale – City of Tallahassee Ben Sharma – Kissimmee Utility Authority Thomas Washburn – Orlando Utilities Commission Eric Grant – Progress Energy – FL Ed Devarona – FL Power and Light Joseph Krupar – FL Municipal Power Agency Ron Dohahey – Tampa Electric Company Mark Bennett – Gainesville Regional Utilities Paul Elwing – City of Lakeland</p>			<p>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.</p>	<p>CCC in their administrative procedures.</p> <p>The drafting team does not consider R2 and R5 redundant with R1 since R1 identifies the standards that have to be achieved while R2 requires the applicant to apply for certification and R5 addresses the RRO adhering to the process.</p> <p>Additional Compliance Information should only be relative to this standard and the compliance elements that you reference will be addressed by the individual Reliability Standards themselves.</p>
<p>Roger Champagne – Hydro-Quebec TransEnergie</p>	<p>X</p>			
<p>P.D. Henderson - IESO Ontario</p>	<p>X</p>			
<p>ISO/RTO Standards Review Committee Anita Lee – AESO Rich Cashdollar – CAISO Sam Jones – ERCOT Peter Henderson – IESO Peter Brandien – ISO NE Bill Phillips – MISO Karl Tammar – NYISO Charles Yeung – SPP Bruce Balmat – PJM</p>	<p>X</p>		<p>Requirements 1 and 5 are redundant. We suggest that R5 be deleted.</p>	<p>The standard has been modified to add RRO to R5 in order to clarify that R1 is intended for the entity seeking certification and R5 is intended for the RRO.</p>
<p>Southern company – Transmission Raymond Vice Jim Griffith Mike Oatts Doug McLaughlin Steve Williamson Jim Viikinsalo Jim Busbin Keith Calhoun</p>		<p>X</p>	<p>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. 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.</p> <p>R1 – Some of these conditions seem impractical as specified. For example the footnote for "Loss of Communications"</p>	<p>When the drafting team removed the procedure from the standard, the industry supported the action taken. The Reliability Standards' process is to avoid referencing standards within another standard to prevent discrepancies between the intended standard elements and future changes that may be made to the referenced standard. The industry also supported maintaining the remaining elements of ORG-001-1. The drafting team is continuing to modify the standard based on the comments received from the industry to obtain final consensus on the standard and its content.</p> <p>R1, R4, and R5 - There are difference associated with these requirements. R1 addresses meeting the certification standards, R4 addresses that ability to meet the reliability standards, and R5 is intended for the RRO. It does not seem appropriate to combine the 3 requirements into 1 requirement.</p>

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			<p>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.</p> <p>R2.14 – “Calculation and reporting” of what in according to NERC standards is to take place? The requirement is unclear.</p>	<p>R1 will be addressed under Loss of Control Center Functionality.</p> <p>R2.14 is not applicable to the TOP standards.</p>
Kathleen M. Goodman – ISO NE	X			
Norman Williams – Sunflower Electric Power Corporation	X			
<p>NERC Personnel Subcommittee</p> <p>Earl F. Cass – NERC</p> <p>Mike Wells – WECC</p> <p>Ray Gross – PJM</p> <p>Geoff Elmer – IESO</p> <p>John Taylor - SPP</p>				
Ben Porath – Daryland Power Cooperative				
<p>Compliance and Certification Committee</p> <p>Martin Sidor – NERC</p> <p>Jerry Smith – Arizona Public Service Commission</p> <p>Earl Cass – Western Area Power Administration</p> <p>Tom Abrams – Santee Cooper</p> <p>Keith Comeaux – CLECO</p> <p>Bob Harbour – Continental Cooperative Services</p> <p>Chuck Waits – Michigan Electric Transmission</p> <p>Larry Grimm - ERCOT</p>		X	<p>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</p>	<p>The standard has been modified to address industry concern. R7 has been deleted since it is an element of R6 and M3 has been changed due to this modification. Requirements R5 and R6 were included based on industry input during previous posting periods and the workshops held by the OCTF. It was made clear that the industry wanted to ensure that certification was implemented consistently throughout the industry and that it did not vary from region to region. This was the method that was selected by the drafting team to try and ensure the consistency desired by the industry. The drafting team will seek NERC counsel input on these requirements.</p>

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			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.	
Terry L. Blackwell – South Carolina Public Service Authority		X	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.	The industry supported the development of the SAR and Standards for certification using the NERC Standards Process Manual.
AEC Tim Hattaway Ken Skroback Ron Graham Darell Pace David Tarpley		X		
Robert Williams - PacifiCorp	X			
Kenneth J. Skroback - Alabama Electric Cooperative				
John Horakh - MAAC	X			
Don Benjamin on behalf of the OC			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."	The drafting team is considering this comment along with other industry input under question #2 dealing with Agreements.
Terry Gucciardo – Alliant Energy	X			
Gary H. Campbell – MAIN		X	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.	The on-site visit has been deleted from the standard since it is expected to be part of the process which is addressed in R6.
Barry Lawson - National Rural Electric Cooperative Association				

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2. Do you agree with the Introduction, Requirements, Measures, and compliance elements identified for **ORG-002-1 — Transmission Operator Certification — Agreements?**

General Response: Industry consensus was not obtained in this posting. The drafting team has made modifications to the standard and will seek affirmation of these changes and seek industry consensus in the next posting.				
Commenter	Yes	No	Comment	Response
TOTAL:	13	15		
TVA Electric Systems Operations Kathleen A. Davis James Regg Chuck Owens Jerry Landers Bill Byrom Chris Donilon Chuck Feagans		X	R2.1.4 - does this refer to IROL only? RC should not be involved with SOLs	R2.1.4 refers to any type of directive that is issued by the RC.
Michael C. Calimanoe – NY ISO	X			
Operating Reliability Working Group Scott Moore – Southwest Power Pool Bob Cochran – SPS Allen Klassen – Westar Stan Mason – SPA Connie Ostermann – Westar Robert Rhodes - SPP		X	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.	This requirement is not intended to cause a TOP to violate the Code of Conduct. The standard has been modified to add your suggestion.
Peter Burke (on behalf of Jason Shaver) – ATC		X	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. Proposed Requirement: 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. 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.	Based on the comments received, the drafting team is recommending the removal of the requirement for signing the NERC Confidentiality Agreement as a requirement for TOP certification and will seek industry affirmation. The removal of this requirement does not remove the obligation that if an entity receives ISN information, they will be required under NERC requirements to sign the NERC Confidentiality Agreement. It is imperative that there are agreements in place that provide the TOP with the information, authority, and tools necessary to maintain the reliability of their system.
Entergy Services, Inc – Transmission Ed Davis		X	R1 places requirements on the TOP and its personnel concerning the NERC Confidentiality Agreement and the	Based on the comments received, the drafting team is recommending the removal of the requirement for signing

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<p>Rick Riley Jay Zimmerman Lynnda Eil Maurice Casadaban George Bartlett Jim Case Bill Aycock Melinda Montgomery Narinder Saini</p>		<p>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. 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 ... ". 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.")". 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. 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. Requirement IRO-001 R8 contains the statement: "Transmission Operators, Balancing Authorities, Generator Operators, Transmission Service Providers, Load-Serving Entities, and Purchasing-Selling Entities shall comply with Reliability Coordinator directives unless such actions would violate safety, equipment, or regulatory or statutory requirements." 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 .."</p>	<p>the NERC Confidentiality Agreement as a requirement for TOP certification and will seek industry affirmation. The removal of this requirement does not remove the obligation that if an entity receives ISN information, they will be required under NERC requirements to sign the NERC Confidentiality Agreement.</p> <p>Based on previous industry comments, the drafting team modified the standards to be less prescriptive by removing who must supply the specific information since the information could be obtained from various sources.</p> <p>The standard has been modified to clarify the elements of the agreements.</p> <p>R2.5 is supported by requirement 4 of the TOP-001 standard.</p> <p>In general, NERC standards are not intended to cause any entity to violate safety, equipment, regulatory or statutory requirements. There is nothing in the standard to prevent this statement from being included in the agreements.</p>
<p>Robert Coish – Manitoba Hydro</p>	<p>X</p>		
<p>Midwest Reliability Organization Terry Bilke - MISO Robert Coish – MRO Ken Goldsmith – ALT Wayne Guttormson – SPC Todd Gosnell – OPPD Alan Boesch – NPPD Jim Maenner – WPS Darrick Moe – WAPA Tom Mielnik – MEC</p>		<p>X (1)In R2 Functional Models Entities should be pluralized where there can be more than one such entity (e.g. Generator Owner(s)). (2)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</p>	<p>(1) Pluralizing of entities has been made. (2)(3)(4) Based on the comments received, the drafting team is recommending the removal of the requirement for signing the NERC Confidentiality Agreement as a requirement for TOP certification and will seek industry affirmation. The removal of this requirement does not remove the obligation that if an entity receives ISN information, they will be required under NERC requirements to sign the NERC Confidentiality Agreement.</p>

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<p>Dennis Florom – LES Joe Knight – MRO The 31 Additional MRO Members</p>			<p>in order. (3) Proposed requirement: R1.3 The Transmission Operator shall be exempt from Requirement 1, if they certify that they fall under the jurisdiction of FERC's Standards of Conduct. (4) MRO request that the SDT post the NERC Confidentiality Agreement. (5) The modifications to the term Agreement has not alleviated a concern that this requirement has the potential to create situations of 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. (6) The MRO is concerned with the requirements in ORG-002-1 that requires agreements between the various NERC functions by April 1, 2006. This will require everyone to do some major contract writing in a short amount of time. At a minimum there should be an extended transition period for this standard</p>	<p>(5) It is imperative that there are agreements in place that provide the TOP with the information, authority, and tools necessary to maintain the reliability of their system.</p> <p>(6) Many of the agreements that are required may already exist or be satisfied with existing contract, designation of authority documents, policies, and procedures. The certification process will begin on April 1, 2006, and does not mean that you have to have these items in place by that date. When you apply to be certified by your Region will dictate when the agreements must be in place and this must be accomplished within the timeframe defined by NERC which should provide a couple of years to complete.</p>
<p>CP9 - NPCC Reliability Standards Working Group Ralph Ruffano – NY Power Authority Kathleen Goodman – ISO NE Roger Champagne Hydro Quebec TransEnergie Khaqan Khan – The IESO, Ontario Al Adamson – NY State Reliability Council David Little – Nova Scotia Power Greg Campoli – NY ISO Guy Zito – Northeast Power Coordinating Ccl.</p>	<p>X</p>		<p>There is no mention of reactive support from Transmission Owners. These owners have cap banks and reactors that are vital in support system voltage.</p>	<p>The reactive support is being obtained from other entities.</p>
<p>David Hawkins – Western Electricity Coordinating Council</p>		<p>X</p>	<p>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.</p>	<p>Two examples are that the system will be operated to not cause generator instability or voltage constraints.</p>
<p>Neil Shockey – Southern California Edison</p>		<p>X</p>	<p>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.</p>	<p>Based on the comments received, the drafting team is recommending the removal of the requirement for signing the NERC Confidentiality Agreement as a requirement for TOP certification and will seek industry affirmation. The removal of this requirement does not remove the obligation that if an entity receives ISN information, they will be required under NERC requirements to sign the NERC Confidentiality Agreement. This requirement is not intended to cause a TOP to violate the Code of Conduct.</p>

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Ray Morella - FirstEnergy Corp	X		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.	This requirement is not intended to cause a TOP to violate the Code of Conduct.
<p>FRCC Linda Campbell - FRCC Eric Senkowicz – FRCC Steve Wallace – Seminole Electric Cooperative Alan Gale – City of Tallahassee Ben Sharma – Kissimmee Utility Authority Thomas Washburn – Orlando Utilities Commission Eric Grant – Progress Energy – FL Ed Devarona – FL Power and Light Joseph Krupar – FL Municipal Power Agency Ron Dohahey – Tampa Electric Company Mark Bennett – Gainesville Regional Utilities Paul Elwing – City of Lakeland</p>		X	<p>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. "</p> <p>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.</p> <p>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?</p> <p>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 "Transmission 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 occurrence. If it's not the same it should be defined.</p> <p>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.</p> <p>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.</p>	<p>The current wording in the Purpose, in conjunction with the Applicability inherently implies that the standard is for initial certification, but it may also be used for any type of re-certification that may be defined by the CCC in their administrative procedures.</p> <p>Based on the comments received, the drafting team is recommending the removal of the requirement for signing the NERC Confidentiality Agreement as a requirement for TOP certification and will seek industry affirmation. The removal of this requirement does not remove the obligation that if an entity receives ISN information, they will be required under NERC requirements to sign the NERC Confidentiality Agreement.</p> <p>The requirement has been modified to state Transmission Operator Area.</p> <p>R2- Many of the agreements that are required may already exist or be satisfied with existing contract, designation of authority documents, policies, and procedures.</p> <p>R2.1.10 The requirement has been changed.</p>
<p>FRCC Linda Campbell - FRCC Eric Senkowicz – FRCC</p>		X	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	Duplicate entry...see above

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<p>Steve Wallace – Seminole Electric Cooperative Alan Gale – City of Tallahassee Ben Sharma – Kissimmee Utility Authority Thomas Washburn – Orlando Utilities Commission Eric Grant – Progress Energy – FL Ed Devarona – FL Power and Light Joseph Krupar – FL Municipal Power Agency Ron Dohahey – Tampa Electric Company Mark Bennett – Gainesville Regional Utilities Paul Elwing – City of Lakeland</p>		<p>Transmission Operator. "</p> <p>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.</p> <p>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?</p> <p>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 "Transmission 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 its first occurrence. If it's not the same it should be defined.</p> <p>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.</p> <p>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.</p>	
<p>Roger Champagne – Hydro-Quebec TransEnergie</p>	<p>X</p>	<p>There is no mention of voltage support from Transmission Owners. These owners have cap banks and reactors that are vital in support system voltage.</p> <p>Please clarify if all personnel to which some tasks may be delegated has to sign the same agreements</p>	<p>The reactive support is being obtained from other entities.</p> <p>No, agreements apply to the responsible entities and not the personnel. The entity responsible for the task is still the one responsible for compliance even though they may have delegated the task to another entity.</p>
<p>P.D. Henderson - IESO Ontario</p>	<p>X</p>	<p>(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.</p> <p>(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</p>	<p>i-The drafting team does not feel that changing the word commitment to obligation will change the intent of the requirement.</p> <p>ii- The drafting team feels that construction plans includes additional elements beyond outage plans and this information is needed by the TOP.</p>

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			<p>typically come from the transmission owner directly or through the transmission operator.</p> <p>(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</p> <p>(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.</p>	<p>iii- Based on the comments received, the drafting team is recommending the removal of the requirement for signing the NERC Confidentiality Agreement as a requirement for TOP certification and will seek industry affirmation.</p> <p>iv- The reactive support is being obtained from other entities.</p>
<p>ISO/RTO Standards Review Committee</p> <p>Anita Lee – AESO</p> <p>Rich Cashdollar – CAISO</p> <p>Sam Jones – ERCOT</p> <p>Peter Henderson – IESO</p> <p>Peter Brandien – ISO NE</p> <p>Bill Phillips – MISO</p> <p>Karl Tammar – NYISO</p> <p>Charles Yeung – SPP</p> <p>Bruce Balmat – PJM</p>	X		<p>(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.</p> <p>(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.</p> <p>(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 requirements, it should say that, or just leave it as a requirement to provide training on the subjects.</p>	<p>i-The drafting team does not feel that changing the word commitment to obligation will change the intent of the requirement.</p> <p>ii- The drafting team feels that construction plans includes additional elements beyond outage plans and this information is needed by the TOP.</p> <p>iii- Based on the comments received, the drafting team is recommending the removal of the requirement for signing the NERC Confidentiality Agreement as a requirement for TOP certification and will seek industry affirmation.</p>
<p>Southern company – Transmission</p> <p>Raymond Vice</p> <p>Jim Griffith</p> <p>Mike Oatts</p> <p>Doug McLaughlin</p> <p>Steve Williamson</p> <p>Jim Viikinsalo</p> <p>Jim Busbin</p> <p>Keith Calhoun</p>		X	<p>General - The requirements of ORG-002-1 are simply restatements of 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.</p> <p>R.2.4.1 This may be limited by the Interconnection Agreement</p> <p>R.2.5 change "and" to "or"</p>	<p>The intent of the certification standards is to ensure that an entity has the process, procedures, and tools to meet the standards that are applicable to the function that they will perform. In order to accomplish this, the certification standards must be complimentary to the reliability standards and may appear to be redundant. In actuality, they are measuring two different elements, preparedness versus performance.</p> <p>As far keeping certification standards current with the reliability standards, it is a requirement of the standard's development process that any revisions or additional standards need to include a review of existing standards to identify any implications to these standards.</p> <p>R2.5 The drafting team feels that "and" requires the Distribution Provider to do both if they have those options available when instructed to do so.</p>
Kathleen M. Goodman – ISO NE	X		<p>There is no mention of reactive support from transmission owners. These owners have cap banks and reactors that are</p>	<p>The reactive support is being obtained from other entities.</p>

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<p>Norman Williams – Sunflower Electric Power Corporation</p>		<p>X</p>	<p>vital in support system voltage.</p> <p>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.</p> <p>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.</p> <p>Many systems are currently operating their transmission system without having signed the current Confidentiality Agreement, and there is no legitimate reason why these entities should not be allowed to continue operating their transmission systems under the Functional Model. The only legitimate and necessary reason for an entity to sign the agreement is if they are receiving security data from the Interregional Security Network (ISN). Many systems currently provide all of the required security data to their reliability coordinator, but do not receive any ISN data in return. This should negate any need to sign the agreement. This standard also does not recognize those small entities that have a waiver from the FERC on the functional separation of their organization.</p> <p>This draft requirement, if left in place, would prevent both G&T Cooperatives and municipal systems that have not signed the ORD agreement and are not functionally separated, from continuing to reliably operate their own transmission systems. It has also come to our attention that the NERC Operating Committee on June 8 unanimously passed a motion that stated in very clear terms the following: The certification standard should not require that the Transmission Operator sign the data confidentiality agreement.”</p> <p>The OC and it 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</p>	<p>Based on the comments received, the drafting team is recommending the removal of the requirement for signing the NERC Confidentiality Agreement as a requirement for TOP certification and will seek industry affirmation. The removal of this requirement does not remove the obligation that if an entity receives ISN information, they will be required under NERC requirements to sign the NERC Confidentiality Agreement.</p>
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			<p>requirement to be certified as a TOP.</p> <p>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.</p>	
<p>NERC Personnel Subcommittee Earl F. Cass – NERC Mike Wells – WECC Ray Gross – PJM Geoff Elmer – IESO John Taylor - SPP</p>				
<p>Ben Porath – Daryland Power Cooperative</p>		X	<p>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.</p> <p>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.</p> <p>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</p>	<p>Based on the comments received, the drafting team is recommending the removal of the requirement for signing the NERC Confidentiality Agreement as a requirement for TOP certification and will seek industry affirmation. The removal of this requirement does not remove the obligation that if an entity receives ISN information, they will be required under NERC requirements to sign the NERC Confidentiality Agreement.</p>

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		<p>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.</p> <p>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 (NVEC). 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.</p> <p>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.</p> <p>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.</p> <p>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:</p> <p>The certification standard should not require that the Transmission Operator sign the data confidentiality agreement.</p>	
<p>Compliance and Certification Committee Martin Sidor – NERC Jerry Smith – Arizona Public Service Commission Earl Cass – Western Area Power Administration Tom Abrams – Santee Cooper</p>			

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Keith Comeaux – CLECO Bob Harbour – Continental Cooperative Services Chuck Waits – Michigan Electric Transmission Larry Grimm - ERCOT				
Alan Gale – City of Tallahassee	X			
Terry L. Blackwell – South Carolina Public Service Authority				
AEC Tim Hattaway Ken Skroback Ron Graham Darell Pace David Tarpley		X	<p>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.</p> <p>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.</p>	Based on the comments received, the drafting team is recommending the removal of the requirement for signing the NERC Confidentiality Agreement as a requirement for TOP certification and will seek industry affirmation. The removal of this requirement does not remove the obligation that if an entity receives ISN information, they will be required under NERC requirements to sign the NERC Confidentiality Agreement.
Robert Williams - PacifiCorp	X			
Kenneth J. Skroback - Alabama Electric Cooperative		X	<p>1. 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.</p> <p>2. 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 unbundled. 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.</p> <p>3. 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</p>	

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		<p>agreement.</p> <p>4. AEC's only interconnections are with Oglethorpe, SMEPA and Southern Co. -- all of which are in the Southern Sub region. The Southern Sub region 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.</p> <p>5. 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.</p> <p>6. 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:</p> <p>7. "The certification standard should not require that the Transmission Operator sign the data confidentiality agreement."</p> <p>8. 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.</p> <p>9. 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.</p> <p>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.</p>	
John Horakh – MAAC	X		
Don Benjamin on behalf of the OC		At today's meeting, the OC talked about the proposed new	Based on the comments received, the drafting team is

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			<p>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:</p> <p>"The certification standard should not require that the Transmission Operator sign the data confidentiality agreement."</p>	<p>recommending the removal of the requirement for signing the NERC Confidentiality Agreement as a requirement for TOP certification and will seek industry affirmation. The removal of this requirement does not remove the obligation that if an entity receives ISN information, they will be required under NERC requirements to sign the NERC Confidentiality Agreement.</p>
Terry Gucciardo – Alliant Energy	X			
Gary H. Campbell – MAIN	X			
Barry Lawson - National Rural Electric Cooperative Association		X	<p>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.</p> <ol style="list-style-type: none"> The requirement of a TOP to sign this agreement and the related functional unbundling requirement is problematic for some G&T Cooperatives and municipal joint action agencies that are currently control area operators (and others performing limited control functions) but do not require access to such data and are not required to functionally unbundle. Many entities have been successfully performing the Control Area Operator function (which for many includes the responsibilities of the TOP function) without being functionally unbundled and without receiving the reliability operating data the confidentiality agreement refers to. Many systems are currently operating their transmission system without having signed the current Confidentiality Agreement, and there is no legitimate reason why these entities should not be allowed to continue operating their transmission systems under the Functional Model. The only legitimate and necessary reason for an entity to sign the agreement is if they are receiving security data from the Interregional Security Network (ISN). Many systems currently provide all of the required security data to their reliability coordinator, but do not receive any ISN data in return. This should negate any need to sign the agreement. This draft requirement, if left in place, would prevent both G&T Cooperatives and municipal systems that have not signed the ORD agreement and are not functionally separated, from continuing to reliably operate their own transmission systems. It has also come to our attention that the NERC Operating Committee on June 8 unanimously passed a motion that stated in very clear terms the following: 	<p>Based on the comments received, the drafting team is recommending the removal of the requirement for signing the NERC Confidentiality Agreement as a requirement for TOP certification and will seek industry affirmation. The removal of this requirement does not remove the obligation that if an entity receives ISN information, they will be required under NERC requirements to sign the NERC Confidentiality Agreement.</p>

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		<p>5. “The certification standard should not require that the Transmission Operator sign the data confidentiality agreement.”</p> <p>6. 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.</p> <p>7. 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.</p> <p>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.</p>	
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3. Do you agree with the Introduction, Requirements, Measures, and compliance elements identified for **ORG-003-1 — Transmission Operator Certification — Personnel?**

General Response: Industry consensus was not obtained in this posting. The drafting team has made modifications to the standard and will seek affirmation of these changes and seek industry consensus in the next posting.

Commenter	Yes	No	Comment	Response
TOTAL:	13	10		
TVA Electric Systems Operations Kathleen A. Davis James Regg Chuck Owens Jerry Landers Bill Byrom Chris Donilon Chuck Feagans		X	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."	R1-This is an initial certification of the entity and its training requirements and records. On going training requirements and records will be included in the regional compliance programs. M2-The measurement has been modified to reflect your concerns.
Michael C. Calimanoe – NY ISO	X			
Operating Reliability Working Group Scott Moore – Southwest Power Pool Bob Cochran – SPS Allen Klassen – Westar Stan Mason – SPA Connie Ostermann – Westar Robert Rhodes - SPP		X	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.	This requirement is not intended to cause a TOP to violate the Code of Conduct.
Peter Burke (on behalf of Jason Shaver) – ATC	X			
Entergy Services, Inc – Transmission Ed Davis Rick Riley Jay Zimmerman Lynnda Ell Maurice Casadaban George Bartlett Jim Case Bill Aycock Melinda Montgomery Narinder Saini		X	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.	The industry has supported this list as tasks that require NERC certified System Operators.

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Robert Coish – Manitoba Hydro		X	<p>1. In purpose add words “as required by NERC Reliability Standards” after “trained.”</p> <p>2. In R1.1 add “and system ratings’ at the end of the first bullet.</p>	<p>1-The drafting team does not feel adding the phrase significantly alters the intent of the statement.</p> <p>2- Facility ratings incorporate both transmission and generation limitations.</p>
<p>Midwest Reliability Organization</p> <p>Terry Bilke - MISO</p> <p>Robert Coish – MRO</p> <p>Ken Goldsmith – ALT</p> <p>Wayne Guttormson – SPC</p> <p>Todd Gosnell – OPPD</p> <p>Alan Boesch – NPPD</p> <p>Jim Maenner – WPS</p> <p>Darrick Moe – WAPA</p> <p>Tom Mielnik – MEC</p> <p>Dennis Florom – LES</p> <p>Joe Knight – MRO</p> <p>The 31 Additional MRO Members</p>		X	<p>(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 .</p>	<p>1-The drafting team does not feel adding the phrase significantly alters the intent of the statement.</p> <p>2- Facility ratings incorporate both transmission and generation limitations.</p>
<p>CP9 - NPCC Reliability Standards Working Group</p> <p>Ralph Rufrano – NY Power Authority</p> <p>Kathleen Goodman – ISO NE</p> <p>Roger Champagne Hydro Quebec TransEnergie</p> <p>Khaqan Khan – The IESO, Ontario</p> <p>Al Adamson – NY State Reliability Council</p> <p>David Little – Nova Scotia Power</p> <p>Greg Campoli – NY ISO</p> <p>Guy Zito – Northeast Power Coordinating Ccl.</p>	X			
David Hawkins – Western Electricity Coordinating Council		X	<p>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.</p>	<p>R1.1-The intent of R1.1 is to identify the real-time task required to be performed by NERC certified operators.</p>
Neil Shockey – Southern California Edison		X	<p>For R1.1, same comment as above regarding FERC SOC concerns. Sharing 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.</p>	<p>This requirement is not intended to cause a TOP to violate the Code of Conduct.</p>
Ray Morella - FirstEnergy Corp			<p>Requirement R1.1. states that the Tasks considered real-time Transmission Operator responsibilities include:</p>	<p>The industry has supported this list as tasks that require NERC certified System Operators.</p>

Transmission Operator Certification Standard Draft 2 — Comments

		<p>Monitor, operate or direct the operations of the transmission system within equipment 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.</p>	<p>R2-This is an initial certification of the entity and its training requirements and records. On going training requirements and records will be included in the regional compliance programs.</p>
<p>FRCC Linda Campbell - FRCC Eric Senkowicz – FRCC Steve Wallace – Seminole Electric Cooperative Alan Gale – City of Tallahassee Ben Sharma – Kissimmee Utility Authority Thomas Washburn – Orlando Utilities Commission Eric Grant – Progress Energy – FL Ed Devarona – FL Power and Light Joseph Krupar – FL Municipal Power Agency Ron Dohahey – Tampa Electric Company Mark Bennett – Gainesville Regional Utilities Paul Elwing – City of Lakeland</p>	<p>X</p>	<p>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.</p>	<p>1-The drafting team does not feel changing the phrase significantly alters the intent of the statement</p> <p>The current wording in the Purpose, in conjunction with the Applicability inherently implies that the standard is for initial certification, but it may also be used for any type of re-certification that may be defined by the CCC in their administrative procedures.</p> <p>R1-The industry has supported this list as tasks that require NERC certified System Operators.</p> <p>This requirement is not intended to cause a TOP to violate the Code of Conduct.</p> <p>R1.1-The requirement has been modified to reflect your concerns but did not include the Distribution Provider because load may be controlled by other entities.</p>

Transmission Operator Certification Standard Draft 2 — Comments

Roger Champagne – Hydro-Quebec TransEnergie	X		Please clarify if all personnel to which some tasks may be delegated during loss of control center functionality must also be NERC certified.	Standard PER-003-M 1.2 states that during a real-time operating emergency, the time when control is transferred from a primary control center to a backup control center shall not be included in the calculation of non-compliance. This time shall be limited to no more than four hours. It is not our intention to modify Standard PER-003.
P.D. Henderson - IESO Ontario	X			
ISO/RTO Standards Review Committee Anita Lee – AESO Rich Cashdollar – CAISO Sam Jones – ERCOT Peter Henderson – IESO Peter Brandien – ISO NE Bill Phillips – MISO Karl Tammar – NYISO Charles Yeung – SPP Bruce Balmat – PJM	X			
Southern company – Transmission Raymond Vice Jim Griffith Mike Oatts Doug McLaughlin Steve Williamson Jim Viikinsalo Jim Busbin Keith Calhoun		X	Same general comment as for Question No. 2 above	The intent of the certification standards is to ensure that an entity has the process, procedures, and tools to meet the standards that are applicable to the function that they will perform. In order to accomplish this, the certification standards must be complimentary to the reliability standards and may appear to be redundant. In actuality, they are measuring two different elements, preparedness versus performance. As far keeping certification standards current with the reliability standards, it is a requirement of the standard's development process that any revisions or additional standards need to include a review of existing standards to identify any implications to these standards.
Kathleen M. Goodman – ISO NE	X			
Norman Williams – Sunflower Electric Power Corporation	X			
NERC Personnel Subcommittee Earl F. Cass – NERC Mike Wells – WECC Ray Gross – PJM Geoff Elmer – IESO John Taylor - SPP		X	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	The standard has been modified to address your concern regarding the inclusion of a training program.

Transmission Operator Certification Standard Draft 2 — Comments

			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.	
Ben Porath – Daryland Power Cooperative				
Compliance and Certification Committee Martin Sidor – NERC Jerry Smith – Arizona Public Service Commission Earl Cass – Western Area Power Administration Tom Abrams – Santee Cooper Keith Comeaux – CLECO Bob Harbour – Continental Cooperative Services Chuck Waits – Michigan Electric Transmission Larry Grimm - ERCOT				
Terry L. Blackwell – South Carolina Public Service Authority				
AEC Tim Hattaway Ken Skroback Ron Graham Darell Pace David Tarpley	X			
Robert Williams - PacifiCorp	X			
Kenneth J. Skroback - Alabama Electric Cooperative				
John Horakh – MAAC	X			
Don Benjamin on behalf of the OC			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."	Based on the comments received, the drafting team is recommending the removal of the requirement for signing the NERC Confidentiality Agreement as a requirement for TOP certification and will seek industry affirmation. The removal of this requirement does not remove the obligation that if an entity receives ISN information, they will be required under NERC requirements to sign the NERC Confidentiality Agreement.
Terry Gucciardo – Alliant Energy	X			
Gary H. Campbell - MAIN	X			

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Barry Lawson - National Rural Electric Cooperative Association				
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Transmission Operator Certification Standard Draft 2 — Comments

4. Do you agree with the Introduction, Requirements, Measures, and compliance elements identified for **ORG-004-1 — Transmission Operator Certification — Data Acquisition and Monitoring?**

General Response: Industry consensus was not obtained in this posting. The drafting team has made modifications to the standard and will seek affirmation of these changes and seek industry consensus in the next posting.

Commenter	Yes	No	Comment	Response
TOTAL:	13	9		
TVA Electric Systems Operations Kathleen A. Davis James Regg Chuck Owens Jerry Landers Bill Byrom Chris Donilon Chuck Feagans		X	R3.2 - need clarification as to what "coordinate" means in this sentence.	Coordinate in this text means that there needs to be sufficient communication between the entities to maintain the reliability of the bulk electric system.
Michael C. Calimanoe – NY ISO	X		What is the difference between “periodicity of transmittal” and “time frame”?	Periodicity of transmittal defines the frequency with which information is exchanged. Time frame defines duration.
Operating Reliability Working Group Scott Moore – Southwest Power Pool Bob Cochran – SPS Allen Klassen – Westar Stan Mason – SPA Connie Ostermann – Westar Robert Rhodes - SPP	X			
Peter Burke (on behalf of Jason Shaver) – ATC		X	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:	R4,M2-The measure has been modified to reflect your concerns.
Entergy Services, Inc – Transmission Ed Davis Rick Riley Jay Zimmerman Lynnda Ell Maurice Casadaban George Bartlett Jim Case Bill Aycock Melinda Montgomery Narinder Saini		X	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.	The industry has supported this list. R2- Provides for the acquisition of data. R3- Provides for the coordination of data.

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Robert Coish – Manitoba Hydro		X	(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.	1-The drafting team does not feel adding the phrases significantly alters or clarifies the intent of the statement.
Midwest Reliability Organization Terry Bilke - MISO Robert Coish – MRO Ken Goldsmith – ALT Wayne Guttormson – SPC Todd Gosnell – OPPD Alan Boesch – NPPD Jim Maenner – WPS Darrick Moe – WAPA Tom Mielnik – MEC Dennis Florm – LES Joe Knight – MRO The 31 Additional MRO Members			(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. (3) 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.	1,2-The drafting team does not feel adding the phrases significantly alters or clarifies the intent of the statement. 3-R4,M2-The measure has been modified to reflect your concerns.
CP9 - NPCC Reliability Standards Working Group Ralph Rufrano – NY Power Authority Kathleen Goodman – ISO NE Roger Champagne Hydro Quebec TransEnergie Khaqan Khan – The IESO, Ontario Al Adamson – NY State Reliability Council David Little – Nova Scotia Power Greg Campoli – NY ISO Guy Zito – Northeast Power Coordinating Ccl.	X			
David Hawkins – Western Electricity Coordinating Council		X	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.	Load forecasting is an element addressed under the BA.
Neil Shockey – Southern California Edison		X	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.	R2-The standard has been modified based on your comments. R4-Interconnection data is included in R4.3
Ray Morella - FirstEnergy Corp	X		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:	R2-The standard does not define the process but states the information to be exchanged and its periodicity.
FRCC		X	In "Purpose" section, suggest deleting "protection and control"	The drafting team does not feel modifying the Purpose

Transmission Operator Certification Standard Draft 2 — Comments

<p>Linda Campbell - FRCC Eric Senkowicz – FRCC Steve Wallace – Seminole Electric Cooperative Alan Gale – City of Tallahassee Ben Sharma – Kissimmee Utility Authority Thomas Washburn – Orlando Utilities Commission Eric Grant – Progress Energy – FL Ed Devarona – FL Power and Light Joseph Krupar – FL Municipal Power Agency Ron Dohahey – Tampa Electric Company Mark Bennett – Gainesville Regional Utilities Paul Elwing – City of Lakeland</p>		<p>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?</p>	<p>significantly alters or clarifies the intent of the statement. The current wording in the Purpose, in conjunction with the Applicability inherently implies that the standard is for initial certification, but it may also be used for any type of re-certification that may be defined by the CCC in their administrative procedures. R1- The drafting team does not feel modifying the Purpose significantly alters or clarifies the intent of the statement. Time frame defines duration. R2.7 The drafting team prefers not to add prescriptive elements. R2.8- R2.2 includes real-time generator capability information. R2.8 provides for the actual reactive generation. R4.6- Voltage phase angle will be determined by the requirements of each TOP. The standard has been altered to reflect "Voltage phase angle".</p>
<p>Roger Champagne – Hydro-Quebec TransEnergie</p>	<p>X</p>		
<p>P.D. Henderson - IESO Ontario</p>	<p>X</p>	<p>(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).</p>	<p>Periodicity of transmittal defines the frequency with which information is exchanges. Time frame defines duration. ii- The drafting team feels that construction plans includes additional elements beyond outage plans and this information is needed by the TOP. iii- The drafting team does not feel modifying the Purpose significantly alters or clarifies the intent of the statement.</p>
<p>ISO/RTO Standards Review Committee Anita Lee – AESO Rich Cashdollar – CAISO Sam Jones – ERCOT Peter Henderson – IESO Peter Brandien – ISO NE Bill Phillips – MISO Karl Tammar – NYISO Charles Yeung – SPP Bruce Balmat – PJM</p>	<p>X</p>	<p>(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).</p>	<p>Periodicity of transmittal defines the frequency with which information is exchanges. Time frame defines duration. ii- The drafting team feels that construction plans includes additional elements beyond outage plans and this information is needed by the TOP. iii- The drafting team does not feel modifying the Purpose significantly alters or clarifies the intent of the statement.</p>
<p>Southern company – Transmission</p>		<p>X</p>	<p>The requirements of ORG-004-1 are both prescriptive and</p>

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Raymond Vice Jim Griffith Mike Oatts Doug McLaughlin Steve Williamson Jim Viikinsalo Jim Busbin Keith Calhoun			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 better results and at a reduced cost.	flexibility without being overly prescriptive. The industry has supported this list. The Reliability Standards' process is to avoid referencing standards within another standard to prevent discrepancies between the intended standard elements and future changes that may be made to the referenced standard.
Kathleen M. Goodman – ISO NE	X			
Norman Williams – Sunflower Electric Power Corporation	X			
NERC Personnel Subcommittee Earl F. Cass – NERC Mike Wells – WECC Ray Gross – PJM Geoff Elmer – IESO John Taylor - SPP				
Ben Porath – Daryland Power Cooperative				
Compliance and Certification Committee Martin Sidor – NERC Jerry Smith – Arizona Public Service Commission Earl Cass – Western Area Power Administration Tom Abrams – Santee Cooper Keith Comeaux – CLECO Bob Harbour – Continental Cooperative Services Chuck Waits – Michigan Electric Transmission Larry Grimm - ERCOT				
Terry L. Blackwell – South Carolina Public Service Authority				
AEC Tim Hattaway Ken Skroback Ron Graham Darell Pace David Tarpley		X	Not clear on what is required for AVR. R.2.9.	This requirement refers to whether the AVR is in or out of service.

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Robert Williams - PacifiCorp	X			
Kenneth J. Skroback - Alabama Electric Cooperative				
John Horakh - MAAC	X			
Don Benjamin on behalf of the OC			<p>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:</p> <p>"The certification standard should not require that the Transmission Operator sign the data confidentiality agreement."</p>	<p>Based on the comments received, the drafting team is recommending the removal of the requirement for signing the NERC Confidentiality Agreement as a requirement for TOP certification and will seek industry affirmation. The removal of this requirement does not remove the obligation that if an entity receives ISN information, they will be required under NERC requirements to sign the NERC Confidentiality Agreement.</p>
Terry Gucciardo – Alliant Energy	X			
Gary H. Campbell – MAIN	X			
Barry Lawson - National Rural Electric Cooperative Association				

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5. Do you agree with the Introduction, Requirements, Measures, and compliance elements identified for **ORG-005-1 — Transmission Operator Certification — System Analysis?**

General Statement: There is a consensus from the industry that this ORG-005 contains the appropriate elements in the requirements, measures and compliance sections. The drafting team has modified this standard per suggested clarifications.

Commenter	Yes	No	Comment	Response
TOTAL:	14	9		
TVA Electric Systems Operations Kathleen A. Davis James Regg Chuck Owens Jerry Landers Bill Byrom Chris Donilon Chuck Feagans		X	R3 - Should say "as time permits"	The drafting team does not feel modifying R3 significantly alters or clarifies the intent of the statement
Michael C. Calimanoe – NY ISO	X			
Operating Reliability Working Group Scott Moore – Southwest Power Pool Bob Cochran – SPS Allen Klassen – Westar Stan Mason – SPA Connie Ostermann – Westar Robert Rhodes - SPP		X	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.	The drafting team feels that the standard needs to allow flexibility without being overly prescriptive.
Peter Burke (on behalf of Jason Shaver) – ATC		X	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 and make payment for those services. "Arrange" should be changed to “notify.”	Arrange is meant to include coordination of all reactive sources required for voltage support. The drafting team does not feel modifying the requirement significantly alters or clarifies the intent of the statement
Entergy Services, Inc – Transmission Ed Davis Rick Riley Jay Zimmerman Lynnda Ell Maurice Casadaban George Bartlett Jim Case Bill Aycock Melinda Montgomery Narinder Saini	X		However, we would really prefer R1 to be replaced by a general statement the that TOP is required to show how it meets the NERC Standards.	
Robert Coish – Manitoba Hydro	X	X	(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"	The drafting team does not feel modifying the requirement significantly alters or clarifies the intent of the statement
Midwest Reliability Organization Terry Bilke - MISO Robert Coish – MRO Ken Goldsmith – ALT	X		(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" (3) What is the definition of the word “arrange”? A TO should be	1-The drafting team does not feel modifying the requirement significantly alters or clarifies the intent of the statement 2- M1-The standard has been modified based on your

Transmission Operator Certification Standard Draft 2 — Comments

Wayne Guttormson – SPC Todd Gosnell – OPPD Alan Boesch – NPPD Jim Maenner – WPS Darrick Moe – WAPA Tom Mielnik – MEC Dennis Florom – LES Joe Knight – MRO The 31 Additional MRO Members			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 and make payment for those services. Arrange should be changed to “notify”.	comments. 3- Arrange is meant to include coordination of all reactive sources required for voltage support.
CP9 - NPCC Reliability Standards Working Group Ralph Rufrano – NY Power Authority Kathleen Goodman – ISO NE Roger Champagne Hydro Quebec TransEnergie Khaqan Khan – The IESO, Ontario Al Adamson – NY State Reliability Council David Little – Nova Scotia Power Greg Campoli – NY ISO Guy Zito – Northeast Power Coordinating Ccl.	X			
David Hawkins – Western Electricity Coordinating Council		X	Item R1 – Recommend changing “...alert operating personnel to limit violations”, to “...alert operating personnel to actual and potential limit violations.”	The drafting team does not feel modifying the requirement significantly alters or clarifies the intent of the statement.
Neil Shockey – Southern California Edison		X	For R1 and R2, it is unclear whether real time contingency analysis will be required. Suggest clarification in existing language.	The drafting team feels that the standard needs to allow flexibility without being overly prescriptive.
Ray Morella - FirstEnergy Corp	X			
FRCC Linda Campbell - FRCC Eric Senkowicz – FRCC Steve Wallace – Seminole Electric Cooperative Alan Gale – City of Tallahassee Ben Sharma – Kissimmee Utility Authority Thomas Washburn – Orlando Utilities Commission Eric Grant – Progress Energy – FL Ed Devarona – FL Power and Light Joseph Krupar – FL Municipal Power Agency Ron Dohahey – Tampa Electric Company Mark Bennett – Gainesville Regional Utilities		X	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.	The drafting team does not feel modifying the requirement significantly alters or clarifies the intent of the statement. The entity seeking certification may delegate task but still retains the responsibility for the task. The current wording in the Purpose, in conjunction with the Applicability inherently implies that the standard is for initial certification, but it may also be used for any type of re-certification that may be defined by the CCC in their administrative procedures. R1-The drafting team feels that the standard needs to allow flexibility without being overly prescriptive.

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Paul Elwing – City of Lakeland			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?.	
Roger Champagne – Hydro-Quebec TransEnergie	X			
P.D. Henderson - IESO Ontario	X		Requirement 1 – Indicate whose operating personnel are to be alerted.	The intent is to notify entities impacted by limit violations. This will vary depending on problems thus, the drafting team does not feel being prescriptive is warranted.
ISO/RTO Standards Review Committee Anita Lee – AESO Rich Cashdollar – CAISO Sam Jones – ERCOT Peter Henderson – IESO Peter Brandien – ISO NE Bill Phillips – MISO Karl Tammar – NYISO Charles Yeung – SPP Bruce Balmat – PJM	X		Requirement 1 – Indicate whose operating personnel are to be alerted.	The intent is to notify entities impacted by limit violations. This will vary depending on problems thus, the drafting team does not feel being prescriptive is warranted.
Southern company – Transmission Raymond Vice Jim Griffith Mike Oatts Doug McLaughlin Steve Williamson Jim Viikinsalo Jim Busbin Keith Calhoun		X	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.	The Reliability Standards' process is to avoid referencing standards within another standard to prevent discrepancies between the intended standard elements and future changes that may be made to the referenced standard.
Kathleen M. Goodman – ISO NE	X			
Norman Williams – Sunflower Electric Power Corporation		X		
NERC Personnel Subcommittee Earl F. Cass – NERC Mike Wells – WECC Ray Gross – PJM Geoff Elmer – IESO John Taylor - SPP				
Ben Porath – Daryland Power Cooperative				
Compliance and Certification Committee Martin Sidor – NERC				

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Jerry Smith – Arizona Public Service Commission Earl Cass – Western Area Power Administration Tom Abrams – Santee Cooper Keith Comeaux – CLECO Bob Harbour – Continental Cooperative Services Chuck Waits – Michigan Electric Transmission Larry Grimm - ERCOT				
Terry L. Blackwell – South Carolina Public Service Authority				
AEC Tim Hattaway Ken Skroback Ron Graham Darell Pace David Tarpley				
Robert Williams – PacifiCorp	X			
Kenneth J. Skroback - Alabama Electric Cooperative				
John Horakh – MAAC	X			
Don Benjamin on behalf of the OC			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."	Based on the comments received, the drafting team is recommending the removal of the requirement for signing the NERC Confidentiality Agreement as a requirement for TOP certification and will seek industry affirmation. The removal of this requirement does not remove the obligation that if an entity receives ISN information, they will be required under NERC requirements to sign the NERC Confidentiality Agreement.
Terry Gucciardo – Alliant Energy	X			
Gary H. Campbell – MAIN	X			
Barry Lawson - National Rural Electric Cooperative Association				

Transmission Operator Certification Standard Draft 2 — Comments

6. Do you agree with the Introduction, Requirements, Measures, and compliance elements identified for **ORG-006-1 — Transmission Operator Certification — Emergency Operations?**

General Response: There is a consensus from the industry that this ORG-006-1 contains the appropriate elements in the requirements, measures and compliance sections. The drafting team has modified this standard per suggested clarifications.

Commenter	Yes	No	Comment	Response
TOTAL:	16	8		
TVA Electric Systems Operations Kathleen A. Davis James Regg Chuck Owens Jerry Landers Bill Byrom Chris Donilon Chuck Feagans		X	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.	The Reliability Standards' process is to avoid referencing standards within another standard to prevent discrepancies between the intended standard elements and future changes that may be made to the referenced standard.
Michael C. Calimanoe – NY ISO	X			
Operating Reliability Working Group Scott Moore – Southwest Power Pool Bob Cochran – SPS Allen Klassen – Westar Stan Mason – SPA Connie Ostermann – Westar Robert Rhodes - SPP	X			
Peter Burke (on behalf of Jason Shaver) – ATC		X	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.	The standard has been modified based on your comments. The intent is to not limit the ability to order load shedding to the reliability coordinator only. During certain emergency conditions the BA or TOP may require load shedding. Shedding of load needs to be coordinated action between the TOP and RC.
Entergy Services, Inc – Transmission Ed Davis Rick Riley Jay Zimmerman Lynnda Ell Maurice Casadaban George Bartlett Jim Case Bill Aycock Melinda Montgomery Narinder Saini		X	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.	The drafting team does not feel modifying the requirement significantly alters or clarifies the intent of the statement. The industry has supported this list.
Robert Coish – Manitoba Hydro		X	M1 refers to use of tools but R1 does not. For example, the	The standard has been modified based on your comments.

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			TO must have tools to mitigate an IROL violation.	
Midwest Reliability Organization Terry Bilke - MISO Robert Coish – MRO Ken Goldsmith – ALT Wayne Guttormson – SPC Todd Gosnell – OPPD Alan Boesch – NPPD Jim Maenner – WPS Darrick Moe – WAPA Tom Mielnik – MEC Dennis Florum – LES Joe Knight – MRO The 31 Additional MRO Members		X	(1) M1 refers to use of tools but R1 does not. For example, the TO must have tools to mitigate an IROL violation. (2) Requirement 1.6 places the act of shedding load on the Transmission Operator but does not take into consideration how a Transmission (3) 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.	The standard has been modified based on your comments. The intent is to not limit the ability to order load shedding to the reliability coordinator only. During certain emergency conditions the BA or TOP may require load shedding. Shedding of load needs to be coordinated action between the TOP and RC.
CP9 - NPCC Reliability Standards Working Group Ralph Rufrano – NY Power Authority Kathleen Goodman – ISO NE Roger Champagne Hydro Quebec TransEnergie Khaqan Khan – The IESO, Ontario Al Adamson – NY State Reliability Council David Little – Nova Scotia Power Greg Campoli – NY ISO Guy Zito – Northeast Power Coordinating Ccl.		X	(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" (3) What is the definition of the word "arrange"? A TO 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 and make payment for those services. Arrange should be changed to "notify".	
CP9 - NPCC Reliability Standards Working Group Ralph Rufrano – NY Power Authority Kathleen Goodman – ISO NE Roger Champagne Hydro Quebec TransEnergie Khaqan Khan – The IESO, Ontario Al Adamson – NY State Reliability Council David Little – Nova Scotia Power Greg Campoli – NY ISO Guy Zito – Northeast Power Coordinating Ccl.		X	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 shedding of firm load when directed by the Reliability Coordinator. This needs to be updated/included in standard.	
David Hawkins – Western Electricity Coordinating Council		X	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.	
Neil Shockey – Southern California Edison		X		
Ray Morella - FirstEnergy Corp		X		

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<p>FRCC Linda Campbell - FRCC Eric Senkowicz – FRCC Steve Wallace – Seminole Electric Cooperative Alan Gale – City of Tallahassee Ben Sharma – Kissimmee Utility Authority Thomas Washburn – Orlando Utilities Commission Eric Grant – Progress Energy – FL Ed Devarona – FL Power and Light Joseph Krupar – FL Municipal Power Agency Ron Dohahey – Tampa Electric Company Mark Bennett – Gainesville Regional Utilities Paul Elwing – City of Lakeland</p>		X	<p>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. "</p> <p>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.</p> <p>Requirement R1.3 should be modified to "...physical or cyber asset within its Transmission Operator Area impacting critical infrastructure facilities or transmission system operations."</p>	<p>The current wording in the Purpose, in conjunction with the Applicability inherently implies that the standard is for initial certification, but it may also be used for any type of re-certification that may be defined by the CCC in their administrative procedures.</p> <p>The standard has been modified based on your comment.</p>
<p>Roger Champagne – Hydro-Quebec TransEnergie</p>	X		<p>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 shedding of firm load when directed by the Reliability Coordinator. This needs to be updated/included in standard.</p>	
<p>P.D. Henderson - IESO Ontario</p>	X		<p>(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.</p> <p>(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)</p> <p>(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.</p>	
<p>ISO/RTO Standards Review Committee Anita Lee – AESO Rich Cashdollar – CAISO Sam Jones – ERCOT Peter Henderson – IESO</p>	X		<p>(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.</p>	

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Peter Brandien – ISO NE Bill Phillips – MISO Karl Tammar – NYISO Charles Yeung – SPP Bruce Balmat – PJM			(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.	
Southern company – Transmission Raymond Vice Jim Griffith Mike Oatts Doug McLaughlin Steve Williamson Jim Viikinsalo Jim Busbin Keith Calhoun		X	Same general comment as for Question No. 2 above.	The intent of the certification standards is to ensure that an entity has the process, procedures, and tools to meet the standards that are applicable to the function that they will perform. In order to accomplish this, the certification standards must be complimentary to the reliability standards and may appear to be redundant. In actuality, they are measuring two different elements, preparedness versus performance. As far keeping certification standards current with the reliability standards, it is a requirement of the standard's development process that any revisions or additional standards need to include a review of existing standards to identify any implications to these standards. The Standard process policy is to avoid referencing other standards within a standard.
Kathleen M. Goodman – ISO NE	X		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 shedding of firm load when directed by the Reliability Coordinator. This needs to be updated/included in standard.	
Norman Williams – Sunflower Electric Power Corporation	X			
NERC Personnel Subcommittee Earl F. Cass – NERC Mike Wells – WECC Ray Gross – PJM Geoff Elmer – IESO John Taylor - SPP				
Ben Porath – Daryland Power Cooperative				
Compliance and Certification Committee Martin Sidor – NERC				

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Jerry Smith – Arizona Public Service Commission Earl Cass – Western Area Power Administration Tom Abrams – Santee Cooper Keith Comeaux – CLECO Bob Harbour – Continental Cooperative Services Chuck Waits – Michigan Electric Transmission Larry Grimm - ERCOT				
Terry L. Blackwell – South Carolina Public Service Authority				
AEC Tim Hattaway Ken Skroback Ron Graham Darell Pace David Tarpley	X			
Robert Williams - PacifiCorp	X			
Kenneth J. Skroback - Alabama Electric Cooperative				
John Horakh – MAAC	X			
Don Benjamin on behalf of the OC			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."	Based on the comments received, the drafting team is recommending the removal of the requirement for signing the NERC Confidentiality Agreement as a requirement for TOP certification and will seek industry affirmation. The removal of this requirement does not remove the obligation that if an entity receives ISN information, they will be required under NERC requirements to sign the NERC Confidentiality Agreement.
Terry Gucciardo – Alliant Energy	X			
Gary H. Campbell – MAIN		X	R1.4 – I think all entities such as RA, BA, TO, etc. should be covered in this requirement as coordination and cooperation may be needed by any one entity. The Measure should use the terminology “and use its tools” to ensure 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.	R1 and M1 have been modified based on your comments.
Barry Lawson - National Rural Electric Cooperative Association				

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7. Do you agree with the Introduction, Requirements, Measures, and compliance elements identified for **ORG-007-1 — Transmission Operator Certification — Loss of Control Center Functionality?**

General Response: Industry consensus was not obtained in this posting. The drafting team has made modifications to the standard and will seek affirmation of these changes and seek industry consensus in the next posting.

Commenter	Yes	No	Comment	Response
TOTAL:	4	18		
TVA Electric Systems Operations Kathleen A. Davis James Regg Chuck Owens Jerry Landers Bill Byrom Chris Donilon Chuck Feagans		X	R2.4 - need clarification as to what "coordinating" means in this sentence.	Coordinate in this text means that there needs to be sufficient communication between the entities to maintain the reliability of the bulk electric system.
Michael C. Calimanoe – NY ISO		X	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	As it states in the purpose, the intent of this standard is that the entity applying for certification must have the capability to operate under the listed conditions. Timeframes associated with implementation of the plan are defined in other reliability standards and must be adhered to.
Operating Reliability Working Group Scott Moore – Southwest Power Pool Bob Cochran – SPS Allen Klassen – Westar Stan Mason – SPA Connie Ostermann – Westar Robert Rhodes - SPP		X	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.	The assumption that you are making is correct. The intent of this standard is that it applies to the single loss of the primary control center functionality as identified in the list in Requirement R1 and could be satisfied with redundant or backup systems. The footnote in the standard has been modified to clarify the intent.
Peter Burke (on behalf of Jason Shaver) – ATC		X	The word "arrange" in Requirement 2.8 should be changed to "notify." Please see our comments under Question 5.	Arrange is meant to include coordination of all reactive sources required for voltage support. The drafting team does not feel modifying the requirement significantly alters or clarifies the intent of the statement
Entergy Services, Inc – Transmission Ed Davis Rick Riley Jay Zimmerman Lynnda Ell Maurice Casadaban George Bartlett Jim Case Bill Aycock Melinda Montgomery Narinder Saini		X	Please delete all of the itemized list in R2.	The drafting team does not feel modifying the requirement significantly alters or clarifies the intent of the statement. The industry has supported this list.

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Robert Coish – Manitoba Hydro		X	<p>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.</p>	<p>The intent is that the entity would have plans to address the loss of functionality under the various situations. If an entity has these plans developed they would be prepared to address when one or more of the situations occurs.</p> <p>The intent of the certification standards is to ensure that an entity has the process, procedures, and tools to meet the standards that are applicable to the function that they will perform. In order to accomplish this, the certification standards must be complimentary to the reliability standards and may appear to be redundant. In actuality, they are measuring two different elements, preparedness versus performance.</p> <p>The Reliability Standards' process is to avoid referencing standards within another standard to prevent discrepancies between the intended standard elements and future changes that may be made to the referenced standard.</p>
<p>Midwest Reliability Organization Terry Bilke - MISO Robert Coish – MRO Ken Goldsmith – ALT Wayne Guttormson – SPC Todd Gosnell – OPPD Alan Boesch – NPPD Jim Maenner – WPS Darrick Moe – WAPA Tom Mielnik – MEC Dennis Florom – LES Joe Knight – MRO The 31 Additional MRO Members</p>		X	<p>(1) 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 MRO is concerned that the requirements of ORG-006-1 are not consistent with approved Version 0 Standard EOP-008-0. The MRO believes the organization certification standards should reflect the existing requirements and not introduce additional requirements. (2)The word "arrange" in Requirement 2.8 should be changed to "notify". Please see our comments under Question 5.</p>	<p>(1)The intent is that the entity would have plans to address the loss of functionality under the various situations. If an entity has these plans developed they would be prepared to address when one or more of the situations occurs.</p> <p>The intent of the certification standards is to ensure that an entity has the process, procedures, and tools to meet the standards that are applicable to the function that they will perform. In order to accomplish this, the certification standards must be complimentary to the reliability standards and may appear to be redundant. In actuality, they are measuring two different elements, preparedness versus performance.</p> <p>The Reliability Standards' process is to avoid referencing standards within another standard to prevent discrepancies between the intended standard elements and future changes that may be made to the referenced standard.</p> <p>(2) Arrange is meant to include coordination of all reactive sources required for voltage support. The drafting team does not feel modifying the requirement significantly alters or clarifies the intent of the statement</p>
<p>CP9 - NPCC Reliability Standards Working Group Ralph Ruffano – NY Power Authority Kathleen Goodman – ISO NE Roger Champagne Hydro Quebec</p>		X	<p>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</p>	<p>As it states in the purpose, the intent of this standard is that the entity applying for certification must have the capability to operate under the listed conditions. Timeframes associated with implementation of the plan are defined in other reliability standards and must be adhered to.</p>

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<p>TransEnergie Khaqan Khan – The IESO, Ontario Al Adamson – NY State Reliability Council David Little – Nova Scotia Power Greg Campoli – NY ISO Guy Zito – Northeast Power Coordinating Ccl.</p>			<p>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.</p>	<p>The footnote in the standard has been modified to clarify the intent.</p>
<p>David Hawkins – Western Electricity Coordinating Council</p>				
<p>Neil Shockey – Southern California Edison</p>		X	<p>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.</p>	<p>R1. A footnote has been added to clarify the intent of the situation. R2.1 and R2.2 have been modified based on your comments. R2.9 Regardless of the structure, the TO is responsible to initiate the communications to the RC even though it may be through an ISO/RTO.</p>
<p>Ray Morella - FirstEnergy Corp</p>		X	<p>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?</p>	<p>The standard does not require a duplicate control center, although that may be one means to meet the requirement. There are also other ways for an entity to satisfy the requirement without developing a duplicate.</p>
<p>FRCC Linda Campbell - FRCC Eric Senkowicz – FRCC Steve Wallace – Seminole Electric Cooperative Alan Gale – City of Tallahassee Ben Sharma – Kissimmee Utility Authority Thomas Washburn – Orlando Utilities Commission Eric Grant – Progress Energy – FL Ed Devarona – FL Power and Light Joseph Krupar – FL Municipal Power Agency Ron Dohahey – Tampa Electric Company Mark Bennett – Gainesville Regional Utilities Paul Elwing – City of Lakeland</p>		X	<p>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</p>	<p>The current wording in the Purpose, in conjunction with the Applicability inherently implies that the standard is for initial certification, but it may also be used for any type of re-certification that may be defined by the CCC in their administrative procedures. R1.The last bullet is intended to address any support function of the control center that could cause the center to become inoperable. The industry has supported this condition through previous posting comments. R2. The standard wording has been modified and should address your concern. R2.6 The drafting team feels that the standard needs to allow flexibility without being overly prescriptive. R2.1-R2.10 The list in ORG-003-1 is addressing tasks performed by personnel to define who must be certified and this standard identifies tasks that must be performed by the entity performing the function.</p>

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			same. The goal is to continue “real-time operations” during the loss of the control center.	
Roger Champagne – Hydro-Quebec TransEnergie		X	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.	As it states in the purpose, the intent of this standard is that the entity applying for certification must have the capability to operate under the listed conditions. Timeframes associated with implementation of the plan are defined in other reliability standards and must be adhered to. The footnote in the standard has been modified to clarify the intent.
P.D. Henderson - IESO Ontario		X	(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. (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".	As it states in the purpose, the intent of this standard is that the entity applying for certification must have the capability to operate under the listed conditions. Timeframes associated with implementation of the plan are defined in other reliability standards and must be adhered to. The footnote in the standard has been modified to clarify the intent. The standard wording has been modified and should address your concern.
ISO/RTO Standards Review Committee Anita Lee – AESO Rich Cashdollar – CAISO Sam Jones – ERCOT Peter Henderson – IESO Peter Brandien – ISO NE Bill Phillips – MISO Karl Tammar – NYISO Charles Yeung – SPP Bruce Balmat – PJM		X	(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.	As it states in the purpose, the intent of this standard is that the entity applying for certification must have the capability to operate under the listed conditions. Timeframes associated with implementation of the plan are defined in other reliability standards and must be adhered to. The footnote in the standard has been modified to clarify the intent. The standard wording has been modified and should address your concern.

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			<p>(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.</p> <p>(iv)- re: R1: The foot note statement related to SCADA (voice) is confusing. The footnote needs to be clarified and/or reworded.</p> <p>(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.</p>	
<p>Southern company – Transmission Raymond Vice Jim Griffith Mike Oatts Doug McLaughlin Steve Williamson Jim Viikinsalo Jim Busbin Keith Calhoun</p>		X	<p>Same general comment as for Question No. 2 above.</p>	<p>The intent of the certification standards is to ensure that an entity has the process, procedures, and tools to meet the standards that are applicable to the function that they will perform. In order to accomplish this, the certification standards must be complimentary to the reliability standards and may appear to be redundant. In actuality, they are measuring two different elements, preparedness versus performance.</p> <p>As far keeping certification standards current with the reliability standards, it is a requirement of the standard's development process that any revisions or additional standards need to include a review of existing standards to identify any implications to these standards.</p>
<p>Kathleen M. Goodman – ISO NE</p>		X	<p>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.</p> <p>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.</p> <p>re: R1: The foot note statement related to SCADA (voice) is confusing. The footnote needs to be clarified and/or reworded.</p>	<p>As it states in the purpose, the intent of this standard is that the entity applying for certification must have the capability to operate under the listed conditions. Timeframes associated with implementation of the plan are defined in other reliability standards and must be adhered to. The footnote in the standard has been modified to clarify the intent.</p>
<p>Norman Williams – Sunflower Electric Power Corporation</p>		X	<p>This appears to require a back-up c0ontrol center when other standards do not require this step.</p>	<p>The standard does not require a duplicate control center, although that may be one means to meet the requirement. There are also other ways for an entity to satisfy the requirement without developing a duplicate.</p>
<p>NERC Personnel Subcommittee</p>				

Transmission Operator Certification Standard Draft 2 — Comments

Earl F. Cass – NERC Mike Wells – WECC Ray Gross – PJM Geoff Elmer – IESO John Taylor - SPP				
Ben Porath – Daryland Power Cooperative				
Compliance and Certification Committee Martin Sidor – NERC Jerry Smith – Arizona Public Service Commission Earl Cass – Western Area Power Administration Tom Abrams – Santee Cooper Keith Comeaux – CLECO Bob Harbour – Continental Cooperative Services Chuck Waits – Michigan Electric Transmission Larry Grimm - ERCOT				
Terry L. Blackwell – South Carolina Public Service Authority				
AEC Tim Hattaway Ken Skroback Ron Graham Darell Pace David Tarpley		X	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.	The standard does not require a duplicate control center, although that may be one means to meet the requirement. There are also other ways for an entity to satisfy the requirement without developing a duplicate.
Robert Williams - PacifiCorp	X			
Kenneth J. Skroback - Alabama Electric Cooperative				
John Horakh - MAAC	X			
Don Benjamin on behalf of the OC			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."	Based on the comments received, the drafting team is recommending the removal of the requirement for signing the NERC Confidentiality Agreement as a requirement for TOP certification and will seek industry affirmation. The removal of this requirement does not remove the obligation that if an entity receives ISN information, they will be required under NERC requirements to sign the NERC Confidentiality Agreement.
Terry Gucciardo – Alliant Energy	X			
Gary H. Campbell – MAIN	X			
Barry Lawson - National Rural Electric Cooperative Association				

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8. Do you agree with the Introduction, Requirements, Measures, and compliance elements identified for **ORG-008-1 — Transmission Operator Certification — Restoration?**

General Response: There is a consensus from the industry that this ORG-008-1 contains the appropriate elements in the requirements, measures and compliance sections.

Commenter	Yes	No	Comment	Response
TOTAL:	16	6		
TVA Electric Systems Operations Kathleen A. Davis James Regg Chuck Owens Jerry Landers Bill Byrom Chris Donilon Chuck Feagans		X	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.	The intent of the certification standards is to ensure that an entity has the process, procedures, and tools to meet the standards that are applicable to the function that they will perform. In order to accomplish this, the certification standards must be complimentary to the reliability standards and may appear to be redundant. In actuality, they are measuring two different elements, preparedness versus performance. The Reliability Standards' process is to avoid referencing standards within another standard to prevent discrepancies between the intended standard elements and future changes that may be made to the referenced standard.
Michael C. Calimanoe – NY ISO	X			
Operating Reliability Working Group Scott Moore – Southwest Power Pool Bob Cochran – SPS Allen Klassen – Westar Stan Mason – SPA Connie Ostermann – Westar Robert Rhodes - SPP	X			
Peter Burke (on behalf of Jason Shaver) – ATC	X			
Entergy Services, Inc – Transmission Ed Davis Rick Riley Jay Zimmerman Lynnda Ell Maurice Casadaban George Bartlett Jim Case Bill Aycock Melinda Montgomery Narinder Saini	X			
Robert Coish – Manitoba Hydro		X	In R1 add the words "that complies with NERC Reliability Standards" after "restoration plan"	The intent of the certification standards is to ensure that an entity has the process, procedures, and tools to meet the standards that are applicable to the function that they will perform. In actuality, they are measuring two different

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				elements, preparedness versus performance. The certification standards are not intended to be a reliability standard compliance review.
Midwest Reliability Organization Terry Bilke - MISO Robert Coish – MRO Ken Goldsmith – ALT Wayne Guttormson – SPC Todd Gosnell – OPPD Alan Boesch – NPPD Jim Maenner – WPS Darrick Moe – WAPA Tom Mielnik – MEC Dennis Florom – LES Joe Knight – MRO The 31 Additional MRO Members		X	In R1 add the words "that complies with NERC Reliability Standards" after "restoration plan"	The intent of the certification standards is to ensure that an entity has the process, procedures, and tools to meet the standards that are applicable to the function that they will perform. In actuality, they are measuring two different elements, preparedness versus performance. The certification standards are not intended to be a reliability standard compliance review.
CP9 - NPCC Reliability Standards Working Group Ralph Rufrano – NY Power Authority Kathleen Goodman – ISO NE Roger Champagne Hydro Quebec TransEnergie Khaqan Khan – The IESO, Ontario Al Adamson – NY State Reliability Council David Little – Nova Scotia Power Greg Campoli – NY ISO Guy Zito – Northeast Power Coordinating Ccl.	X			
David Hawkins – Western Electricity Coordinating Council				
Neil Shockey – Southern California Edison		X	For R2, under and 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.	Regardless of the structure, the TO is responsible to provide its plan to the RC even though it may be through an ISO/RTO.
Ray Morella - FirstEnergy Corp	X			
FRCC Linda Campbell - FRCC Eric Senkowicz – FRCC Steve Wallace – Seminole Electric Cooperative Alan Gale – City of Tallahassee Ben Sharma – Kissimmee Utility Authority Thomas Washburn – Orlando Utilities Commission Eric Grant – Progress Energy – FL		X	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.	The current wording in the Purpose, in conjunction with the Applicability inherently implies that the standard is for initial certification, but it may also be used for any type of re-certification that may be defined by the CCC in their administrative procedures. The standard has been modified based on your comments.

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Ed Devarona – FL Power and Light Joseph Krupar – FL Municipal Power Agency Ron Dohahey – Tampa Electric Company Mark Bennett – Gainesville Regional Utilities Paul Elwing – City of Lakeland				
Roger Champagne – Hydro-Quebec TransEnergie	X			
P.D. Henderson - IESO Ontario	X		There may be a need to include a minimum list of items that need to be included in the TOP restoration plan.	Requirement R1 identifies necessary elements for certification. To satisfy on-going compliance, the additional elements that you seek are defined in EOP-005.
ISO/RTO Standards Review Committee Anita Lee – AESO Rich Cashdollar – CAISO Sam Jones – ERCOT Peter Henderson – IESO Peter Brandien – ISO NE Bill Phillips – MISO Karl Tammar – NYISO Charles Yeung – SPP Bruce Balmat – PJM	X		There may be a need to include a minimum list of items that need to be included in the TOP restoration plan.	Requirement R1 identifies necessary elements for certification. To satisfy on-going compliance, the additional elements that you seek are defined in EOP-005.
Southern company – Transmission Raymond Vice Jim Griffith Mike Oatts Doug McLaughlin Steve Williamson Jim Viikinsalo Jim Busbin Keith Calhoun		X	Same general comment as for Question No. 2 above.	<p>The intent of the certification standards is to ensure that an entity has the process, procedures, and tools to meet the standards that are applicable to the function that they will perform. In order to accomplish this, the certification standards must be complimentary to the reliability standards and may appear to be redundant. In actuality, they are measuring two different elements, preparedness versus performance.</p> <p>As far keeping certification standards current with the reliability standards, it is a requirement of the standard's development process that any revisions or additional standards need to include a review of existing standards to identify any implications to these standards.</p> <p>The Reliability Standards' process is to avoid referencing standards within another standard to prevent discrepancies between the intended standard elements and future changes that may be made to the referenced standard.</p>
Kathleen M. Goodman – ISO NE	X			
Norman Williams – Sunflower Electric Power Corporation	X			
NERC Personnel Subcommittee				

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Earl F. Cass – NERC Mike Wells – WECC Ray Gross – PJM Geoff Elmer – IESO John Taylor - SPP				
Ben Porath – Daryland Power Cooperative				
Compliance and Certification Committee Martin Sidor – NERC Jerry Smith – Arizona Public Service Commission Earl Cass – Western Area Power Administration Tom Abrams – Santee Cooper Keith Comeaux – CLECO Bob Harbour – Continental Cooperative Services Chuck Waits – Michigan Electric Transmission Larry Grimm - ERCOT				
Terry L. Blackwell – South Carolina Public Service Authority				
AEC Tim Hattaway Ken Skroback Ron Graham Darell Pace David Tarpley	X			
Robert Williams – PacifiCorp	X			
Kenneth J. Skroback - Alabama Electric Cooperative				
John Horakh - MAAC	X			
Don Benjamin on behalf of the OC			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."	Based on the comments received, the drafting team is recommending the removal of the requirement for signing the NERC Confidentiality Agreement as a requirement for TOP certification and will seek industry affirmation. The removal of this requirement does not remove the obligation that if an entity receives ISN information, they will be required under NERC requirements to sign the NERC Confidentiality Agreement.
Terry Gucciardo – Alliant Energy	X			
Gary H. Campbell – MAIN	X			

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

Commenter	Comment	Response
TVA Electric Systems Operations Kathleen A. Davis James Regg Chuck Owens Jerry Landers Bill Byrom Chris Donilon Chuck Feagans		
Michael C. Calimanoe – NY ISO	The NYISO fully supports the elements identified in the ISO/RTO Council and NPCC Regional comments.	
Operating Reliability Working Group Scott Moore – Southwest Power Pool Bob Cochran – SPS Allen Klassen – Westar Stan Mason – SPA Connie Ostermann – Westar Robert Rhodes - SPP		
Peter Burke (on behalf of Jason Shaver) – ATC		
Entergy Services, Inc – Transmission Ed Davis Rick Riley Jay Zimmerman Lynnda Eil Maurice Casadaban George Bartlett Jim Case Bill Aycock Melinda Montgomery Narinder Saini	<p>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.</p> <p>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. 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. Please add a provision for periodic on-site reviews of TOPs to ensure they continue to meet Certification Standard requirements. Please add provisions for de-certification of TOPs, for both self-decertification and de-certification for cause.</p>	<p>ORG-001 does reference the certification procedures that are being developed by the CCC. These procedures are expected to be posted for comment before the certification standards go to ballot.</p> <p>The intent of the certification standards is to ensure that an entity has the process, procedures, and tools to meet the standards that are applicable to the function that they will perform. In order to accomplish this, the certification standards must be complimentary to the reliability standards and may appear to be redundant. In actuality, they are measuring two different elements, preparedness versus performance.</p> <p>Standard modifications have been made particularly in the agreements area (ORG-002) to clarify TOP responsibilities.</p> <p>Under the current situation, the intent of this standard applies to initial certification and does not establish an on-going certification requirement. The process for any type of periodic review for certification, in addition to de-certification, is under the responsibility of the CCC and should be addressed by the certification procedures that they are developing.</p>
Robert Coish – Manitoba Hydro	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	The intent of the certification standards is to ensure that an entity has the process, procedures, and tools to meet the standards that are applicable to the function that they will perform. In order to

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	<p>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.</p>	<p>accomplish this, the certification standards must be complimentary to the reliability standards and may appear to be redundant. In actuality, they are measuring two different elements, preparedness versus performance.</p> <p>As far keeping certification standards current with the reliability standards, it is a requirement of the standard's development process that any revisions or additional standards need to include a review of existing standards to identify any implications to these standards.</p>
<p>Midwest Reliability Organization Terry Bilke - MISO Robert Coish – MRO Ken Goldsmith – ALT Wayne Guttormson – SPC Todd Gosnell – OPPD Alan Boesch – NPPD Jim Maenner – WPS Darrick Moe – WAPA Tom Mielnik – MEC Dennis Florum – LES Joe Knight – MRO The 31 Additional MRO Members</p>	<p>There is a risk that the capability requirements stated specifically in the TO 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 unintentional existing differences in this regard or to automatically accommodate any new capability requirements that may arise during the ongoing standards development process. This will put the Certification standards on firmer legal ground. R4 in ORG-001-1, and R1 in ORG-007-1, for example, go a long way to address this issue but are insufficient. Other requirements are stated too vaguely such as a requirement to "coordinate" . This does not provide any detail or direction to identify detailed requirements. In these cases it would be better to say "coordinate as required by NERC Reliability Standards".</p>	<p>The intent of the certification standards is to ensure that an entity has the process, procedures, and tools to meet the standards that are applicable to the function that they will perform. In order to accomplish this, the certification standards must be complimentary to the reliability standards and may appear to be redundant. In actuality, they are measuring two different elements, preparedness versus performance.</p> <p>As far keeping certification standards current with the reliability standards, it is a requirement of the standard's development process that any revisions or additional standards need to include a review of existing standards to identify any implications to these standards.</p> <p>The intent of the standard is to identify what needs to be accomplished not to be prescriptive in how it is accomplished. The standard provides latitude for how an entity meets the requirements.</p>
<p>CP9 - NPCC Reliability Standards Working Group Ralph Rufrano – NY Power Authority Kathleen Goodman – ISO NE Roger Champagne Hydro Quebec TransEnergie Khaqan Khan – The IESO, Ontario Al Adamson – NY State Reliability Council David Little – Nova Scotia Power Greg Campoli – NY ISO Guy Zito – Northeast Power Coordinating Ccl.</p>	<p>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....."</p> <p>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. It is expected that audits will be conducted for these standards. In that case we suggest that data retention period be specified. 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.</p> <p>Moreover, the implementation and application of this standard in terms of coordination with other Functional Model related entities</p>	<p>We appreciate your comment, but the definition of the term Agreement will be applicable to its use in all standards and will be included in the glossary.</p> <p>Certification standards are unique in that non-compliance results in not being granted certification.</p> <p>Since these standards are currently intended for initial certification only, the only data retention requirement in the certification standards is for NERC to retain the RRO letter of certification.</p> <p>Organization Certification Standards are developed in accordance with the NERC Reliability Standards Process manual. The Functional Model served as a reasonable framework for their initial development.</p>

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	<p>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.</p> <p>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.</p>	
David Hawkins – Western Electricity Coordinating Council	<p>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.</p>	<p>These standards are not intended to set the parameters of who is a Transmission Operator. Entity registration in conjunction with the RRO reliability plans will clarify individual entity responsibilities and certification requirements.</p>
Neil Shockey – Southern California Edison		
Ray Morella - FirstEnergy Corp		
<p>FRCC</p> <p>Linda Campbell - FRCC</p> <p>Eric Senkowicz – FRCC</p> <p>Steve Wallace – Seminole Electric Cooperative</p> <p>Alan Gale – City of Tallahassee</p> <p>Ben Sharma – Kissimmee Utility Authority</p> <p>Thomas Washburn – Orlando Utilities Commission</p> <p>Eric Grant – Progress Energy – FL</p> <p>Ed Devarona – FL Power and Light</p> <p>Joseph Krupar – FL Municipal Power Agency</p> <p>Ron Dohahey – Tampa Electric Company</p> <p>Mark Bennett – Gainesville Regional Utilities</p> <p>Paul Elwing – City of Lakeland</p>	<p>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.</p>	<p>The drafting team will include the implementation plan for the standards in the next posting.</p>
Roger Champagne – Hydro-Quebec TransEnergie	<p>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....."</p> <p>It is expected that audits will be conducted for these standards. In that case we suggest that data retention period be specified. We recommend that the proposed standards be thoroughly reviewed and reassessed by the SDT based on the outcomes and</p>	<p>We appreciate your comment, but the definition of the term Agreement will be applicable to its use in all standards and will be included in the glossary.</p> <p>Since these standards are currently intended for initial certification only, the only data retention requirement in the certification standards is for NERC to retain the RRO letter of certification.</p>

Transmission Operator Certification Standard Draft 2 — Comments

	<p>resolutions of existing registration and any Functional Model updates and revisions</p> <p>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.</p> <p>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.</p>	<p>Organization Certification Standards are developed in accordance with the NERC Reliability Standards Process manual. The Functional Model served as a reasonable framework for their initial development. Not all Functional Model entities will have certification requirements.</p>
<p>P.D. Henderson - IESO Ontario</p>	<p>(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.</p> <p>(ii)- With regards to the definition of the Agreement, we recommend that following wording should be used for the proposed statement/definition of Agreement, i.e. "For purposes of applying the term 'Agreement' within this standard it shall mean a contract or other document delineating an arrangement that expresses assent and or obligation by two or more parties to the same object. This arrangement determines a course of action to be followed by all parties involved in the situation. The key components of the agreement must identify the ability, intent, and authority of the parties. The requirement for an agreement can be satisfied in a variety of ways, including but not limited to: contracts, designation of authority documents, market rules, policies, and procedures.</p> <p>(iii)- It is expected that audits will be conducted for these standards. In that case, we suggest that a retention period for any audit records and results be specified.</p> <p>(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.</p>	<p>These standards are not intended to set the parameters of who is a Transmission Operator. Entity registration in conjunction with the RRO reliability plans will clarify individual entity responsibilities and certification requirements.</p> <p>The definition of the term Agreement will be applicable to its use in all standards and will be included in the glossary.</p> <p>Since these standards are currently intended for initial certification only, the only data retention requirement in the certification standards is for NERC to retain the RRO letter of certification.</p> <p>The drafting team will include the implementation plan for the standards in the next posting. Not all Functional Model entities will have certification requirements.</p>
<p>ISO/RTO Standards Review Committee Anita Lee – AESO Rich Cashdollar – CAISO Sam Jones – ERCOT Peter Henderson – IESO</p>	<p>(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</p>	<p>These standards are not intended to set the parameters of who is a Transmission Operator. Entity registration in conjunction with the RRO reliability plans will clarify individual entity responsibilities and certification requirements.</p> <p>The definition of the term Agreement will be applicable to its use in</p>

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<p>Peter Brandien – ISO NE Bill Phillips – MISO Karl Tammar – NYISO Charles Yeung – SPP Bruce Balmat – PJM</p>	<p>provide consistency in registration and ultimately certification. Our understanding is that these issues are under consideration at the Functional Model Working Group and we would ask that these guidelines be developed and included in the revised Functional Model or be included in the implementation plan for the TOP Certification Standard.</p> <p>(ii)- With regards to the definition of the Agreement, we recommend that following wording should be 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.....”</p> <p>(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.</p> <p>(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.</p>	<p>all standards and will be included in the glossary.</p> <p>Since these standards are currently intended for initial certification only, the only data retention requirement in the certification standards is for NERC to retain the RRO letter of certification.</p> <p>The drafting team will include the implementation plan for the standards in the next posting. Not all Functional Model entities will have certification requirements.</p>
<p>Southern company – Transmission Raymond Vice Jim Griffith Mike Oatts Doug McLaughlin Steve Williamson Jim Viikinsalo Jim Busbin Keith Calhoun</p>	<p>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.</p>	<p>The intent of the certification standards is to ensure that an entity has the process, procedures, and tools to meet the standards that are applicable to the function that they will perform. In order to accomplish this, the certification standards must be complimentary to the reliability standards and may appear to be redundant. In actuality, they are measuring two different elements, preparedness versus performance.</p> <p>As far keeping certification standards current with the reliability standards, it is a requirement of the standard’s development process that any revisions or additional standards need to include a review of existing standards to identify any implications to these standards.</p> <p>The industry has supported the development of these standards to address certification.</p>
<p>Kathleen M. Goodman – ISO NE</p>	<p>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 believe 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</p>	<p>These standards are not intended to set the parameters of who is a Transmission Operator. Entity registration in conjunction with the RRO reliability plans will clarify individual entity responsibilities and certification requirements.</p> <p>The drafting team will include the implementation plan for the standards in the next posting.</p>

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	developed and included in the revised Functional Model or be included in the implementation plan for the TOP Certification Standard.	
Norman Williams – Sunflower Electric Power Corporation		
NERC Personnel Subcommittee Earl F. Cass – NERC Mike Wells – WECC Ray Gross – PJM Geoff Elmer – IESO John Taylor - SPP		
Ben Porath – Daryland Power Cooperative		
Compliance and Certification Committee Martin Sidor – NERC Jerry Smith – Arizona Public Service Commission Earl Cass – Western Area Power Administration Tom Abrams – Santee Cooper Keith Comeaux – CLECO Bob Harbour – Continental Cooperative Services Chuck Waits – Michigan Electric Transmission Larry Grimm - ERCOT		
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Kenneth J. Skroback - Alabama Electric Cooperative		
John Horakh - MAAC		
Don Benjamin on behalf of the OC		
Terry Gucciardo – Alliant Energy		
Gary H. Campbell - MAIN		

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

Commenter	Comment	Response
TVA Electric Systems Operations Kathleen A. Davis James Regg Chuck Owens Jerry Landers Bill Byrom Chris Donilon Chuck Feagans		
Michael C. Calimanoe – NY ISO		
Operating Reliability Working Group Scott Moore – Southwest Power Pool Bob Cochran – SPS Allen Klassen – Westar Stan Mason – SPA Connie Ostermann – Westar Robert Rhodes - SPP		
Peter Burke (on behalf of Jason Shaver) – ATC		
Entergy Services, Inc – Transmission Ed Davis Rick Riley Jay Zimmerman Lynnda Ell Maurice Casadaban George Bartlett Jim Case Bill Aycock Melinda Montgomery Narinder Saini		
Robert Coish – Manitoba Hydro		
Midwest Reliability Organization Terry Bilke - MISO Robert Coish – MRO Ken Goldsmith – ALT Wayne Guttormson – SPC Todd Gosnell – OPPD Alan Boesch – NPPD Jim Maenner – WPS Darrick Moe – WAPA Tom Mielnik – MEC Dennis Florom – LES Joe Knight – MRO The 31 Additional MRO Members		
CP9 - NPCC Reliability Standards		

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<p>Working Group Ralph Rufrano – NY Power Authority Kathleen Goodman – ISO NE Roger Champagne Hydro Quebec TransEnergie Khaqan Khan – The IESO, Ontario Al Adamson – NY State Reliability Council David Little – Nova Scotia Power Greg Campoli – NY ISO Guy Zito – Northeast Power Coordinating Ccl.</p>		
<p>David Hawkins – Western Electricity Coordinating Council</p>		
<p>Neil Shockey – Southern California Edison</p>		
<p>Ray Morella - FirstEnergy Corp</p>		
<p>FRCC Linda Campbell - FRCC Eric Senkowicz – FRCC Steve Wallace – Seminole Electric Cooperative Alan Gale – City of Tallahassee Ben Sharma – Kissimmee Utility Authority Thomas Washburn – Orlando Utilities Commission Eric Grant – Progress Energy – FL Ed Devarona – FL Power and Light Joseph Krupar – FL Municipal Power Agency Ron Dohahey – Tampa Electric Company Mark Bennett – Gainesville Regional Utilities Paul Elwing – City of Lakeland</p>		
<p>P.D. Henderson - IESO Ontario</p>		
<p>Roger Champagne – Hydro-Quebec TransEnergie</p>		
<p>ISO/RTO Standards Review Committee Anita Lee – AESO Rich Cashdollar – CAISO Sam Jones – ERCOT Peter Henderson – IESO Peter Brandien – ISO NE Bill Phillips – MISO</p>		

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Karl Tammar – NYISO Charles Yeung – SPP Bruce Balmat – PJM		
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Norman Williams – Sunflower Electric Power Corporation		
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Robert Williams - PacifiCorp		
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Electric Cooperative		
John Horakh - MAAC		
Don Benjamin on behalf of the OC		
Terry Gucciardo – Alliant Energy		
Gary H. Campbell - MAIN		