

Comment Form — Draft NERC Rules of Procedure section 500 & Appendix 5

Comment Form for: Draft NERC Rules of Procedure section 500 & Appendix 5 (Solicitation of public comments per [NERC bylaws](#) Article XI section 2)

Please use this form to submit comments on the proposed *NERC Rules of Procedure section 500, Appendix 5, and TOP, RC & BA questionnaires*. Comments must be submitted by **August 8, 2008**, you may submit the completed form by e-mail to jim.hughes@nerc.net with the words **"Certification Process"** in the subject line. Additionally, if you wish to redline your comments, these documents are provided to you in Word. If you have any questions please contact Jim Hughes by telephone at 609-203-2288.

Background Information:

During the September 12, 2007 joint meeting of the Standards Committee (SC) and the Compliance and Certification Committee (CCC), the SC and CCC agreed to translate the work done on the following draft standards into a new certification process under the CCC:

- Transmission Operator Certification Standards (ORG-001 through ORG-008)
- Balancing Authority Certification Standards (ORG-009 through ORG-018)
- Reliability Coordinator Certification Standards (ORG-020 through ORG-027)

The CCC's Organization Registration & Certification Subcommittee (ORCS) has translated the essential elements of the above draft certification standards into new entity certification processes and want to post the new processes for comment (RoP 500, Appendix 5, and questionnaires).

Therefore, the ORCS is soliciting for public review and comments on the draft revisions to the NERC Rules of Procedure section 500, Appendix 5, and the TOP, BA, RC questionnaires relating to the certification process.

Commenter Information	
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Position: Manager, Regulatory Affairs	If team, names of team members:
Region (e.g., RFC, SERC): NPCC	Date: August 01, 2008
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(Check all that apply): <input checked="" type="checkbox"/> RC <input checked="" type="checkbox"/> BA <input checked="" type="checkbox"/> TOP <input type="checkbox"/> TO <input checked="" type="checkbox"/> PA <input checked="" type="checkbox"/> TP <input type="checkbox"/> GO <input type="checkbox"/> GOP <input type="checkbox"/> LSE <input type="checkbox"/> RP <input checked="" type="checkbox"/> TSP <input type="checkbox"/> DP <input type="checkbox"/> PSE <input type="checkbox"/> IA <input type="checkbox"/> Region <input type="checkbox"/> NERC <input type="checkbox"/> NA	

Do you wish to have NERC contact you regarding your comments? Yes No

Comment Form — Draft NERC Rules of Procedure section 500 & Appendix 5

▷Comment: Incorrect reference to "Planning Authorities"			
Document that the comment applies to:	RoP 500 <input checked="" type="checkbox"/>	Appendix 5 <input type="checkbox"/>	Provisional Certification <input type="checkbox"/>
	TOP Questionnaire <input type="checkbox"/>	BA Questionnaire <input type="checkbox"/>	RC Questionnaire <input type="checkbox"/>
Section that comment applies to: 501			
Recommended solution: The term "Planning Authorities" should be replaced by "Planning Coordinators" per the NERC Functional Model definitions.			

▷Comment:			
Given the purpose of Appendix 5 is to "provide the process on completing certification of a new entity that will become NERC certified as an RC, TOP, or BA", we think it is necessary to clearly define what is a "new entity". Is a "new entity" one that desires to operate as an RC, TOP or BA and has not been subject to a NERC Compliance Audit after June 2007, or is it an entity that has neither registered as a Control Area nor listed in the NERC Compliance Registry (NCR) and operating as an RC, BA, and/or TOP, or both. In any case, reference should be made to the Provisional Certification Process document.			
Document that the comment applies to:	RoP 500 <input type="checkbox"/>	Appendix 5 <input checked="" type="checkbox"/>	Provisional Certification <input type="checkbox"/>
	TOP Questionnaire <input type="checkbox"/>	BA Questionnaire <input type="checkbox"/>	RC Questionnaire <input type="checkbox"/>
Section that comment applies to:			
Recommended solution:			

▷Comment: It is unclear to us where this Provisional Certification Process document fits in or is referenced. Should it be referenced in Appendix 5, or is it intended to be an attachment to Section 500 or Appendix 5? Please clarify.			
Document that the comment applies to:	RoP 500 <input type="checkbox"/>	Appendix 5 <input type="checkbox"/>	Provisional Certification <input checked="" type="checkbox"/>
	TOP Questionnaire <input type="checkbox"/>	BA Questionnaire <input type="checkbox"/>	RC Questionnaire <input type="checkbox"/>
Section that comment applies to:			
Recommended solution:			

▷Comment: (1) In Section 3, the questionnaires contain the wording " ...have been trained on their responsibilities under the agreement as identified in TOP-005.TOP-005..." This is not a direct reference. TOP-005 only mentions the NERC Data Confidentiality Agreement but does not include the Agreement itself. Further, since Canadian entities are not under FERC's jurisdiction, the questionnaire should clarify that signing of the FERC Standards of Conduct apply to US entities only.			
(2) In Section 4, the requirement that "Entities to which tasks are delegated shall have a training program and provide its operating personnel with training to meet the requirements of PER-004" seems unreasonable. There is already a requirement (R6) in IRO-001 that "...all delegated tasks are carried out by NERC-certified Reliability Coordinator operating personnel." We assess that this requirement is sufficient to ensure that tasks are performed by qualified personnel. Note, that the RC personnel training program may not be implemented in entities that are not an RC, the entities having delegated the RC tasks should not be required to a training program themselves. How these personnel acquire the NERC-certified status and where they are trained should not be a part of the organization certification requirements.			
(3) In Section (6), System Analysis, reference is made to IRO-001. We believe this reference should be made to IRO-004, R4.			
Document that the comment applies to:	RoP 500 <input type="checkbox"/>	Appendix 5 <input type="checkbox"/>	Provisional Certification <input type="checkbox"/>
	TOP Questionnaire <input type="checkbox"/>	BA Questionnaire <input type="checkbox"/>	RC Questionnaire <input checked="" type="checkbox"/>

