

SERC OC Standards Review Group Comments on Proposed Changes to NERC Rules of Procedure Section 500 and Appendix 5

The SERC OC Standards Review Group is pleased to submit the following comments on draft revisions to the NERC Rules of Procedure section 500, Appendix 5, and the TOP, BA, RC questionnaires relating to the certification process.

1. Although we interpret the wording in the **NERC Provisional Certification Requirements** to indicate that provisional certification will be granted to an RC, BA or TOP upon completion of a Readiness Evaluation **anytime after the Readiness program was initiated** (emphasis ours) **and** upon completion of a Regional Entity or NERC CMEP audit (on site activities completed by the audit team) **after** June 18, 2007, we would suggest that the subcommittee clarify the description of the NERC Provisional Certification Process requirements.
2. In each of the certification questionnaires, Question 3 requires that the entity seeking certification as a TOP, BA or RC have agreements in place that define its responsibilities, authority and interaction with entities that are necessary to perform its transmission operations function. This list appears to be too broad for several reasons: 1.) there may not be agreements where the entities are under the same corporate umbrella, particularly in a vertically integrated utility, where they should not be required; 2.) for example, a generator may not have an agreement with a TOP but will have one with a TS;. These rules may be in conflict with agreements written and in place prior to the procedures. We suggest that additional clarification of what agreements are required and which entities they are applicable to should be made.