

I. NOTICES AND COMMUNICATIONS

Notices and communications concerning these comments should be addressed to:³

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II. MOTION FOR LEAVE TO ANSWER

Given that the Joint Comments request that the Commission reject and remand the proposed changes to the NERC Rules of Procedure⁴, the Joint Comments should be considered a protest. The Commission’s rules generally do not permit the filing of answers to protests; however, the Commission has granted leave to file such answers if they clarify the issues in dispute, ensure a complete and accurate record, or otherwise provide information that will assist the Commission in its decision-making process.⁵ To ensure that the Commission has complete and accurate

³ Persons to be included on the Commission’s service list are identified by an asterisk. NERC respectfully requests a waiver of Rule 203 of the Commission’s regulations, 18 C.F.R. § 385.203 (2017), to allow the inclusion of more than two persons on the service list in this proceeding.

⁴ 16 U.S.C. § 824o (2012).

⁵ See, e.g., *San Diego Gas & Elec. Co. v. Sellers of Energy and Ancillary Servs.*, 108 FERC ¶ 61,219, at P 14, n. 17 (2004) (answer was accepted as it “provided information that assisted [the Commission in its] decision-making process”); *Mich. Elec. Transmission Co., LLC*, 106 FERC ¶ 61,064, at P 3 (2004) (the permitted answer “provides information that clarifies the issues and aids us in the decisional process”); *N. Am. Elec. Reliability Corp.*, 116 FERC ¶ 61,062, at P 24 (2006) (reply comments of NERC and others accepted “because they have provided information that assisted us in our decision making process”); *N. Am. Elec. Reliability Corp.*, 117 FERC ¶ 61,091, at P 18 (2006) (same); *N. Am. Elec. Reliability Corp.*, 119 FERC ¶ 61,248, at P 6 (2007); *N. Am. Elec. Reliability Corp.*, 127 FERC ¶ 61,209, at P 5 (2009).

information upon which to make a decision on the proposed changes to the NERC ROP, NERC requests leave to submit this Answer to the Joint Comments.

III. The Personnel Certification Program and the Continuing Education Program are Not Redundant with PER-005-2.

Reliability Standard PER-005-2 establishes an internal training requirement for a broad group of personnel at Reliability Coordinators, Transmission Operators and Balancing Authorities. Specifically, it applies to System Operators, Generator Operators and Operations Support personnel. Pursuant to Requirement R1, each Reliability Coordinator, Transmission Operator and Balancing Authority must use a “systematic approach to develop and implement a training program” for these personnel. This training program is an in-house training program tailored to the needs of the organization. The required “systematic approach” is designed to determine “(1) the skills and knowledge necessary for the position in question; (2) the type of training needed to provide the trainee the identified skills and/or knowledge; (3) whether the trainee can competently perform his/her job function; and (4) whether the training is effective or requires adjustment.” Requirement R1.1.4 further requires these entities to “conduct an evaluation each calendar year” of their training programs. Ultimately, entities subject to this Reliability Standard retain the discretion to apply these principles of a systematic approach to training to develop and implement training requirements for their applicable personnel. Through this Reliability Standard, NERC does not dictate a minimum threshold of competency for any personnel. Different entities may identify different skills and/or knowledge for their applicable personnel.

In contrast to PER-005-2, Section 600 of the NERC ROP establishes a program which awards a credential for system operators who pass the Personnel Certification Program examination. Passing this examination signifies that a system operator has essential knowledge of

NERC Reliability Standards and principles for Bulk-Power System operations. System operators with this credential maintain it by obtaining Continuing Education credits through the Continuing Education Program under section 900 of the NERC ROP. The existence of this credential and the requirements for maintaining it are the responsibility of the Personnel Certification Governance Committee and the Personnel Subcommittee which report to the NERC Board of Trustees. Training requirements for System Operators, Generator Operators and Operations Support personnel under PER-005-2 are the responsibility of the training programs at those entities. PER-005-2 does not mandate that all training programs qualify for credit towards maintaining the NERC-awarded credential.

If a Reliability Coordinator, Transmission Operator or Balancing Authority opts to have one of its PER-005-2 mandated training courses qualify as an approved learning activity for certified system operators under section 900 of the NERC ROP, then it must submit an Individual Learning Activity application to NERC. NERC reiterates that Reliability Coordinators, Balancing Authorities and Transmission Operators may offer courses and train on topics relevant to their personnel; however, not all training courses that they offer will qualify as learning activities for system operators. Any proposals to re-examine credential renewal or maintenance should be raised with the industry-led Personnel Certification Governance Committee.

IV. CONCLUSION

For the reasons set forth above, NERC requests that the Commission approve the proposed revisions to the NERC ROP included in **Exhibits A-B**.

Respectfully submitted,

/s/ Nina H. Jenkins-Johnston

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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing document upon all parties listed on the official service lists compiled by the Secretary in Docket No. RR17-6-000.

Dated at Washington, DC this 17th day of October, 2017.

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