

# Compliance Operations

## Draft Reliability Standard Compliance Guidance for PER-005-2

October 1, 2013

### Introduction

The NERC Compliance department (Compliance) worked with the PER-005 standard drafting team (SDT) to review the proposed standard PER-005-2. The purpose of the review was to discuss the requirements of the proposed standard to obtain an understanding of its intended purpose and the evidence necessary to support compliance. The purpose of this document is to address specific questions posed by the PER SDT in order to aid in the drafting of the requirements and provide a level of understanding regarding evidentiary support necessary to demonstrate compliance.

While all compliance evaluations require levels of auditor judgment, participating in these reviews allows Compliance to develop training and approaches to support a high level of consistency in audits conducted by the Regional Entities. The following questions and answers are intended to assist the SDT in further refining the standard and to serve as a resource in the development of training for auditors.

### PER-005-2 Questions

#### Question 1

For Requirement R1, what criteria would an auditor use to determine if a registered entity uses a systematic approach to training for developing its training program?

#### *Compliance Response to Question 1*

A systematic approach to training is a concept or methodology. This version of the standard retains flexibility for the entity to determine how it will apply the principles of this concept to develop and implement its training program. There are different models of systematic approaches to training, and the standard does not specify a certain model that should be used.

Consistent with FERC orders<sup>1</sup> and current Electric Reliability Organization's practices, to determine whether the entity used a systematic approach to training, an auditor will evaluate whether the entity's training program follows the principles below:

- Assess training needs (analysis)
- Conduct the training activity (design, develop and implement)
- Evaluate the training activity (evaluate the effectiveness of the training)

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<sup>1</sup> See FERC Order No. 742 at P 25 and Order No. 693 at P 1380, 1382.

Further, as provided in the Application Guidelines attached to the standard, an auditor will assess whether the entity's training program, using a systematic approach to training:

1. determined the skills and knowledge needed to perform ~~or support~~ Real-time reliability-related tasks;
2. determined what training is needed to achieve those skills and knowledge;
3. determined if the trainee can perform ~~or support~~ the Real-time reliability-related task(s) acceptably in either a training or on-the-job environment; and
4. determined if the training is effective, and makes adjustments as necessary.

### Question 2

In Requirement R3, does an entity that has one or more IROLs have 12 months to conduct simulation technology training when it obtains another IROL?

#### **Compliance Response to Question 2**

No, if an entity currently has one or more IROLs, it has the ability to conduct simulation technology. The 12 months applies only to an entity that did not have any IROLs but obtains an IROL for the first time.

### Question 3

Is an auditor to assess a registered entity based on a systematic approach to training for the Operations Support Personnel referenced in Requirement R4?

#### **Compliance Response to Question 3**

Yes. An auditor will evaluate the entity's systematic approach to training with regard to the impact of the Operations Support Personnel's job function on the Real-time reliability-related tasks, NOT on the Operations Support Personnel's ability to conduct these tasks.

Operations Support Personnel are required to receive training only on how their job functions impact the ~~Real-time reliability-related tasks~~ ~~reliable operations of the Bulk Electric System (BES)~~. Therefore, modifying the assessment outlined above in Question #1, rather than:

- determined the skills and knowledge needed to perform Real-time reliability-related tasks;

the auditor will determine if the entity's systematic approach to training:

- determined the skills and knowledge needed to understand the impact of the job function(s) on the Real-time reliability-related tasks.

### Question 4

Since Requirement R5 does not include the same parts as Requirement R1 to define a systematic approach to training, do entities have to adhere to the Requirement R1 parts for Requirement R5?

**Compliance Response to Question 4**

No. However, an auditor would verify that an entity followed a systematic approach to training. An auditor will evaluate this systematic approach to training with regard to the impact of the Generator Operator's (GOP's) job function(s) on the reliable operations of the BES during normal and emergency operations.

Consistent with FERC orders<sup>2</sup> and current Electric Reliability Organization's practices, to determine whether the entity used a systematic approach to training, an auditor will evaluate whether the entity's training program follows the principles below:

- Assess training needs (analysis)
- Conduct the training activity (design, develop and implement)
- Evaluate the training activity (evaluate the effectiveness of the training)

Further, as provided in the Application Guidelines attached to the standard, an auditor will assess whether the entity's training program, using a systematic approach to training:

1. determined the skills and knowledge needed to understand the impact of the Generator Operator's job function(s) on the reliable operations of the BES during normal and emergency operations.
2. determined what training is needed to achieve those skills and knowledge;
3. determined if the trainee can support the reliable operation of the BES during normal and emergency operations acceptably in either a training or on-the-job environment; and
4. determined if the training is effective, and makes adjustments as necessary.

**Conclusion**

Following final approval of the Reliability Standard, Compliance will develop the final Reliability Standards Auditor Worksheet (RSAW) and associated training. Attachment A represents the version of the proposed standard requirements referenced in this document.

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<sup>2</sup> See FERC Order No. 742 at P 25 and Order No. 693 at P 1380, 1382.