



# Consideration of Comments Summary

Project 2010-01 Training (PER)

September 27, 2013

**RELIABILITY | ACCOUNTABILITY**



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Introduction.....	3
Consideration of Comments.....	4
Purpose .....	4
Administrative.....	4
Standards Authorization Request (SAR) .....	4
NERC Glossary Term “System Operator” .....	4
Definition of Terms Used in Standard.....	4
Applicability Section.....	5
Requirement R1.....	5
Requirement R2 .....	5
Requirement R3 .....	6
Requirement R4 .....	6
Requirement R5 .....	6
Violation Risk Factors (VRFs).....	6
There were comments regarding concerns with the VRFs. All VRFs have been reviewed and modified as necessary. ....	6
Violation Severity Levels (VSLs) .....	6
There were comments regarding concerns with the VSLs. All VSLs have been reviewed and modified as necessary. ....	6
Time Horizon.....	6
Mapping Document .....	6
Compliance Input.....	7
Process .....	7
Attachment A – SDT Members Contact Information .....	8

# Introduction

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The Project 2010-01 drafting team thanks everyone who submitted comments on the draft PER-005-2 standard. This standard was posted for a 45-day public comment period from August 23, 2013, through September 3, 2013. NERC asked Stakeholders to provide feedback on the standard and associated documents through a special electronic comment form. There were 71 sets of responses, including comments from approximately 235 people from approximately 130 companies, representing 9 of the 10 Industry Segments, as shown in the table on the following pages.

All comments submitted may be reviewed in their original format on the standard's [project page](#).

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 Vice President and Director of Standards Mark Lauby at 404-446-2560 or at [mark.lauby@nerc.net](mailto:mark.lauby@nerc.net). In addition, there is a NERC Reliability Standards Appeals Process.<sup>1</sup>

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<sup>1</sup> The appeals process is in the Standard Processes Manual: [http://www.nerc.com/files/Appendix\\_3A\\_StandardsProcessesManual\\_20120131.pdf](http://www.nerc.com/files/Appendix_3A_StandardsProcessesManual_20120131.pdf)

# Consideration of Comments

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## Purpose

The PER standards drafting team (SDT) appreciates industry's comments on the PER-005-2 standard. The SDT reviewed all comments carefully and made changes to the standard accordingly; however, the new Standards Process Manual (SPM) does not require the SDT to respond to each comment if a successive ballot is needed. The following pages are a summary of the comments received and how the PER SDT addressed them. If a specific comment was not addressed in the summary of comments, please contact the NERC standards developer or one of the SDT members to discuss. (See Attachment A for the SDT contact information.)

## Administrative

The SDT removed the acronym for the systematic approach to training (SAT) to avoid the implication that there is only one model of a systematic approach. There are many ways that an entity can implement a systematic approach to training.

## Standards Authorization Request (SAR)

The SDT received a few comments about unchecking "Generator Owner" and as a result modified the SAR to uncheck the term. Based on another comment, the SDT modified the discussion of the 32 hour training obligation from Requirement R3. The language was modified to state: *"Remove from existing PER-005-1, Requirement R3 the requirement to provide at least 32 hours of emergency operations training as it no longer meets criteria set forth in the standard for utilizing a systematic approach to training. The appropriate amount of such training should be determined "by the applicable entities" through the analysis phase of a systematic approach to training and outlined in a continuous education section of their training program. Any additional hours may be duplicative or repetitive for the entity in providing training to their personnel."*

## NERC Glossary Term "System Operator"

One commenter asked the SDT not to change the NERC Glossary term "System Operator" from the current NERC Glossary definition. The intent in modifying the definition, however, was to remove the term "Generator Operators" and to make the language clearer.

The SDT also received several comments regarding the capitalization of "Control Center" within the System Operator definition. The term "control center" has been lower-cased since it has not yet been approved by FERC.

Lastly, the SDT reviewed other standards that contain the NERC Glossary term "System Operator." The proposed change in the term "System Operator" does not affect other standards that use the term. The PER Implementation Plan has a copy of which standards use the term "System Operator."

## Definition of Terms Used in Standard

The terms provided below are defined for use only within PER-005-2 and, upon approval of the standard, will not be moved to the NERC Glossary of Terms.

### **System Personnel**

Several commenters questioned the use of "System Personnel" throughout the standard. One suggestion was to replace the term with "System Operator." The term "System Personnel" includes more applicable entities than that of "System Operator." The term "System Personnel" was created to allow the standard to be more concise by preventing repetition of the long description ("Reliability Coordinators, Balancing Authorities, Transmission Operators, and Transmission Owners") throughout the standard. Additionally, the term "System Personnel" was created to include Transmission Owners with local control center personnel.

### ***Operations Support Personnel***

Comments stated that the term “Support Personnel” was unclear. The SDT added the term “Operations” to the standard-specific defined term to make it “Operations Support Personnel.” The SDT also expanded the definition to clarify that the functional entities (Reliability Coordinators, Balancing Authorities, Transmission Operators, and Transmission Owners) must identify Operations Support Personnel. The SDT modified the definition to use the exact language from FERC Order Nos. 693 and 742. Additionally, the language describing Transmission Owners comes directly from FERC Order No. 693, paragraphs 1343 and 1347.

### **Applicability Section**

The SDT received several comments requesting clarification of which Transmission Owners are subject to the PER-005-2 standard. As a result, the SDT modified the applicability section to clarify the Transmission Owners subject to the standard and better define the local control center personnel as required by the FERC directive. The Transmission Owner applicability section now states: “Transmission Owner that has personnel at a facility, excluding field-switching personnel, who act independently to carry out tasks that require Real-time operation of the Bulk Electric System (BES) including protecting assets, protecting personnel safety, adhering to regulatory requirements, and establishing stable islands during system restoration.”

Based on comments received, the SDT updated the applicability section to clarify which Generator Operators are applicable to the PER-005-2 standard. The now states that only Generator Operators that have the following personnel are subject to the standard: “Dispatch personnel at a centrally located dispatch center who receive direction from their Reliability Coordinator, Balancing Authority, Transmission Operator, or Transmission Owner and may develop specific dispatch instructions for plant operators under their control. This does not include plant operators located at a generator plant site or personnel at a centrally located dispatch center who relay dispatch instructions without making any modifications.”

### **Requirement R1**

The SDT removed the acronym for the systematic approach to training (SAT) to avoid the implication that there is only one model of a systematic approach. There are many ways that an entity can implement a systematic approach to training.

The SDT added the phrase “if necessary” to Requirement R1.1.1 to clarify that changes to the list of Real-time reliability-related tasks are to be made if necessary. If no change is necessary, an entity is still expected to document that the Real-time reliability-related tasks have been reviewed each calendar year.

An additional comment regarding the phrase “shall design and develop training materials” (Requirement R1.2) said that the requirement seems to require the registered entity to internally perform this requirement and precludes the option to hire a third-party company to perform this task. The entity has the responsibility for the design and development of the training materials. Who actually does the work is irrelevant.

The SDT updated Measure M1 to reflect Requirement R1 based on comments saying the two did not align. Additionally, a commenter requested that the word “annual,” located in Measure M1.4, be replaced with the phrase “each calendar year.” This modification was made.

### **Requirement R2**

The majority of the comments on Requirement R2 dealt with VRFs and VSLs. Responses to VRFs and VSLs can be found their respective sections in this document.

The SDT added the phrase “Real-time reliability-related tasks” to Requirements R2 and R2.1 to make it clear that it is Real-time reliability-related tasks that require verification of performance capability.

## **Requirement R3**

Commenters stated that six months is insufficient when an entity does not have simulation technology, so after discussion, the SDT changed the time frame from six to 12 months.

## **Requirement R4**

Many comments said that Operations Support Personnel do not perform the Real-time reliability-related tasks, so the SDT modified the requirement to clarify that the training for Operations Support Personnel is on the impact of their job functions on the Real-time reliability-related tasks—not on the Real-time reliability-related tasks performed by the System Operator. In response to other comments, the SDT added Requirement R4.1 to clarify that conducting a systematic approach to training includes completing an evaluation.

Additionally, one comment asked if Requirement R4 had to do with a systematic approach to training. The intent of Requirement R4 was for a systematic approach to training to be used, so the SDT added the phrase “systematic approach to training” to Requirement R4.

## **Requirement R5**

Commenters requested clarity for the training requirements for Generator Operators. The SDT modified Requirement R5 to clarify that training for Generator Operators is to be on the impact of their job functions on the reliable operations of the BES. The SDT added Requirement R5.1 to clarify the requirement for completing an evaluation. In addition, although it may be beneficial for Generator Operators to request assistance from their RCs, BAs, and TOPs to understand their impact on Reliable Operation, the SDT removed “coordination with other applicable entities” from the standard as many commenters indicated that Generator Operators were capable of determining the training needs of their personnel. Removing the coordination requirement reduces the administrative compliance burden for the applicable entities.

## **Violation Risk Factors (VRFs)**

There were comments regarding concerns with the VRFs. All VRFs have been reviewed and modified as necessary.

## **Violation Severity Levels (VSLs)**

There were comments regarding concerns with the VSLs. All VSLs have been reviewed and modified as necessary.

## **Time Horizon**

The SDT received several comments regarding the time horizon being long-term planning for the PER-005-2 standard. A systematic approach to training is a continuous activity; therefore, the horizon does not need to be changed to near-term planning. Additionally, the time horizon has gone through the process and has been FERC-approved.

## **Mapping Document**

There was a comment that “R” within the PER-005-2 mapping document does not match the standard. The SDT appreciates the commenter’s careful review and has updated the mapping document to match the requirement.

## Compliance Input

The SDT received comments regarding a Reliability Standards Audit Worksheet (RSAW). The Compliance department will not provide the RSAW until six months before the standard is implemented. In the meantime, a document titled "Compliance Input" is provided, along with the posted standard, to explain the contents of the RSAW.

## Process

Several commenters expressed concern that the simultaneous posting of the Standards Authorization Request (SAR) and the pro forma standard for initial comment and ballot was outside the scope of the Standards Process Manual (SPM). The SDT notes that, although this action was authorized by the NERC Standards Committee, NERC received an appeal of the SPM, which has been resolved. The SDT notes the process issue is outside the purview of the SDT.

## Attachment A – SDT Members Contact Information

**Table 7: Standard Drafting Team Member Contact Information**

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