

## Responses to Industry Comments – One Credential Whitepaper

May 2019

On February 11, 2019 the Personnel Certification Governance Committee (PCGC) posted a whitepaper for comment on proposed changes to the NERC System Operator Certification program. The proposal is to change the current System Operator Certification from its current four credentials listed below to one credential, “NERC Certified System Operator.”

- Reliability Coordinator (RC)
- Balancing and Interchange Operator (BI)
- Transmission Operator (TO)
- Balancing, Interchange and Transmission Operator (BT)

The PCGC recognizes this will require a Standard Authorization Request (SAR) to revise PER-003 (Operating Personnel Credentials).

During the comment period over 40 responses were received with an overwhelming majority in support of the proposed change. While the overwhelming majority supported the change, a number of comments and questions were received concerning the change. To eliminate repetitive responses, the PCGC has grouped the comments into 8 categories and responded to each category rather than addressing individual comments.

The PCGC wishes to thank everyone who took time to comment on this very important subject. From the comments received, the PCGC continues to see strong industry support for the development of the SAR which will allow the change to one NERC Certified System Operator Certification credential.

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|          | Industry Comment   | Response  |
| 1        | Clarification of the implementation plan for the transition of multiple credentials into one new System Operator Certification credential. | It is the intent of the PCGC to transition all credentials, including the RC credential, into one new NERC Certified System Operator (NCSO) credential following adoption of the changes required to PER-003. The implementation plan will be further expanded upon while the Standard Drafting Team is working on the required changes to PER-003. Program changes and |

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|          |   | applicable documentation will be published prior to implementation of the new exam.   |
| 2        | Clarification of the transition plan to migrate to the new System Operator Certification credential.                | Current credential holders will have their credential(s) migrated to the new System Operator Certification credential (NCSO) following adoption of the changes required to PER-003. They will not be required to retest. The current credential expiration date will not change. Existing CEHs will be applied to the NCSO credential. No CE hours will be lost and no credential period will be reduced or extended. Credentials renewed after the conversion date will be subject to the new CEHs requirement.  |
| 3        | Clarification of the process for testing under one System Operator Certification credential.                        | The future single credential exam will be based on the current process which entails the results of the current Job Task Analysis (JTA) representing all System Operator disciplines. The purpose of the JTA is to identify the shared minimum knowledge and skills required by all System Operators. Following the effective date of the changes required to PER-003, new credential candidates will begin testing under the new System Operator Certification exam. A single exam content outline will be created based on the most recent JTA. Program changes and applicable documentation will be published prior to implementation of the new exam. |
| 4        | Clarification of the intent for transitioning to one System Operator Certification credential.                      | The System Operator Certification program measures minimum knowledge and skills. Recent JTAs conducted by the PCGC indicate that all System Operators share similar areas of competency, or at least need the same level of operating knowledge. The Operators' knowledge is further enhanced by each entity's specific training program. It is the opinion of the PCGC that a transition of four separate credentials into a single credential brings a common set of knowledge and skills which better supports Bulk Electric System Reliability.   |
| 5        | Clarification of the Continuing Education Hours required to renew the new System Operator Certification credential. | Following adoption of the changes to PER-003 and the transition of credential holders to the one System Operator Certification credential, credential holders must acquire 140 hours of Continuing Education with   |

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|          |  | 30 hours of Standards and 30 hours of Simulation over a 3 year period to renew their credential.   |
| 6        | Effect on the NERC System Operator Certification testing fees and renewal fees.          | The PCGC will continue to follow the NERC budgeting process; and, will adjust testing and credential renewal fees as necessary.  |
| 7        | Clarification of comments regarding the establishment of Region specific Certifications. | The NERC System Operator Certification program must be applied equally across all Regions as the credential is a personal credential; and, thus portable across all Regions.   |
| 8        | Comments regarding publishing a draft copy of the SOC Program Manual for comment.        | The PCGC will follow the process for System Operator Certification program manual revisions as defined in the NERC Rules of Procedure. Program manual changes will be communicated via the NERC newsletter and SOCCED notifications. |