

**Reliability Standard Audit Worksheet[[1]](#footnote-1)**

# PER-003-1 – Operating Personnel Credentials

***This section must be completed by the Compliance Enforcement Authority.***

**Registered Entity:**

**NCR Number:**

**Applicable Function(s):** BA, TOP, RC

**Applicable CAN(s):** None

**Applicable Bulletin(s):**

**Compliance Assessment Date:**

**Compliance Monitoring Method:**

**Names of Auditors:**

# **Subject Matter Experts**

Identify Subject Matter Expert(s) responsible for this Reliability Standard. (Insert additional rows if necessary)

**Registered Entity Response (Required):**

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| --- | --- | --- | --- |
| **SME Name** | **Title** | **Organization** | **Requirement(s)** |
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# **R1 Supporting Evidence and Documentation**

**R1.** Each Reliability Coordinator shall staff its Real-time operating positions performing Reliability Coordinator reliability-related tasks with System Operators who have demonstrated minimum competency in the areas listed by obtaining and maintaining a valid NERC Reliability Operator certificate**(1)** : *[Risk Factor: High][Time Horizon: Real-time Operations]*

**1.1.** Areas of Competency

**1.1.1.** Resource and demand balancing

**1.1.2.** Transmission operations

**1.1.3.** Emergency preparedness and operations

**1.1.4.** System operations

**1.1.5.** Protection and control

**1.1.6.** Voltage and reactive

**1.1.7.** Interchange scheduling and coordination

**1.1.8.** Interconnection reliability operations and coordination

1 Non-NERC certified personnel performing any reliability-related task of an operating position must be under the direct supervision of a NERC Certified System Operator stationed at that operating position; the NERC Certified System Operator at that operating position has ultimate responsibility for the performance of the reliability-related tasks.

**Registered Entity Compliance Response (Required):**

Describe, in narrative form, how you meet compliance with this Requirement.

**Registered Entity Evidence (Required):**

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| --- |
| Provide the following for all evidence submitted (Insert additional rows if necessary):  File Name, File Extension, Document Title, Revision, Date, Page(s), Section(s), Section Title(s), Description |
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**Audit Team Evidence Reviewed** **(This section must be completed by the Compliance Enforcement Authority):**

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**Compliance Assessment Approach Specific to PER-003-1, R1**

***This section must be completed by the Compliance Enforcement Authority***

Review the evidence to verify the Registered Entity has:

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|  | A list of system operators performing RC reliability-related tasks including the name of the operator as it appears on the certificate, the certificate number, and the level of certification. |
|  | Determine if other operating positions are located in the control room but not identified as performing RC reliability-related tasks. If yes, review evidence to validate certification is not required under R1. |
|  | Work schedules for the operating positions performing RC reliability-related tasks to verify only NERC-certified personnel worked these positions, or that non NERC-certified personnel were supervised by appropriate NERC-certified personnel, when working in positions with RC reliability-related responsibilities. |
|  | Using the information obtained above, verify all system operators performing or supervising RC reliability-related tasks obtained and maintained a valid NERC Reliability Operator certificate. |
|  | Audit Team may contact NERC to confirm the certification information is valid. |
| **Note to Auditor:**   * Areas of Competency are addressed when the certification exams are developed. Compliance is demonstrated by the system operators holding the required level of certification. * Documentation of compliance is for the audit period unless otherwise determined. * Evidence for non-certified positions might include task lists, job descriptions, etc. showing no RC reliability-related tasks performed, or work schedules demonstrating that a NERC certified employee was working with/supervising the non NERC-certified employee. | |

**Auditor Notes:**

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# **R2 Supporting Evidence and Documentation**

**R2.** Each Transmission Operator shall staff its Real-time operating positions performing Transmission Operator reliability-related tasks with System Operators who have demonstrated minimum competency in the areas listed by obtaining and maintaining one of the following valid NERC certificates**(1)** : *[Risk Factor: High][Time Horizon: Real-time Operations]*:

**2.1.** Areas of Competency

**2.1.1.** Transmission operations

**2.1.2.** Emergency preparedness and operations

**2.1.3.** System operations

**2.1.4.** Protection and control

**2.1.5.** Voltage and reactive

**2.2.** Certificates

* Reliability Operator
* Balancing, Interchange and Transmission Operator
* Transmission Operator

**1** Non-NERC certified personnel performing any reliability-related task of an operating position must be under the direct supervision of a NERC Certified System Operator stationed at that operating position; the NERC Certified System Operator at that operating position has ultimate responsibility for the performance of the reliability-related tasks.

**Registered Entity Compliance Response (Required):**

Describe, in narrative form, how you meet compliance with this Requirement.

**Registered Entity Evidence (Required):**

|  |
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| Provide the following for all evidence submitted (Insert additional rows if necessary):  File Name, File Extension, Document Title, Revision, Date, Page(s), Section(s), Section Title(s), Description |
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**Audit Team Evidence Reviewed** **(This section must be completed by the Compliance Enforcement Authority):**

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**Compliance Assessment Approach Specific to PER-003-1, R2**

***This section must be completed by the Compliance Enforcement Authority***

Review the evidence to verify the Registered Entity has:

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|  | A list of system operators performing TOP reliability-related tasks including the name of the operator as it appears on the certificate, the certificate number, and the level of certification. |
|  | Determine if other operating positions are located in the control room but not identified as performing TOP reliability-related tasks. If yes, review evidence to validate certification is not required under R2. |
|  | Work schedules for the operating positions performing TOP reliability-related tasks to verify only NERC-certified personnel worked these positions, or that non NERC-certified personnel were supervised by appropriate NERC-certified personnel, when working in positions with TOP reliability-related responsibilities. |
|  | Using the information obtained above, verify all system operators performing or supervising TOP reliability-related tasks obtained and maintained one of the following NERC certificates:   * Reliability Operator * Balancing, Interchange and Transmission Operator * Transmission Operator |
|  | Audit Team may contact NERC to confirm the certification information is valid. |
| **Note to Auditor:**   * Areas of Competency are addressed when the certification exams are developed. Compliance is demonstrated by the system operators holding the required level of certification. * Documentation of compliance is for the audit period unless otherwise determined. * Evidence for non-certified positions might include task lists, job descriptions, etc showing no TOP reliability-related tasks performed, or work schedules demonstrating that a NERC certified employee was working with/supervising the non NERC-certified employee. | |

**Auditor Notes:**

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# **R3 Supporting Evidence and Documentation**

**R3.** Each Balancing Authority shall staff its Real-time operating positions performing Balancing Authority reliability-related tasks with System Operators who have demonstrated minimum competency in the areas listed by obtaining and maintaining one of the following valid NERC certificates**(1)** : *[Risk Factor: High][Time Horizon: Real-time Operations]*:

**3.1.** Areas of Competency

**3.1.1.** Resources and demand balancing

**3.1.2.**  Emergency preparedness and operations

**3.1.3.** System operations

**3.1.4.** Interchange scheduling and coordination

**3.2.** Certificates

* Reliability Operator
* Balancing, Interchange and Transmission Operator
* Balancing and Interchange Operator

**1** Non-NERC certified personnel performing any reliability-related task of an operating position must be under the direct supervision of a NERC Certified System Operator stationed at that operating position; the NERC Certified System Operator at that operating position has ultimate responsibility for the performance of the reliability-related tasks.

**Registered Entity Compliance Response (Required):**

Describe, in narrative form, how you meet compliance with this Requirement.

**Registered Entity Evidence (Required):**

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| Provide the following for all evidence submitted (Insert additional rows if necessary):  File Name, File Extension, Document Title, Revision, Date, Page(s), Section(s), Section Title(s), Description |
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**Audit Team Evidence Reviewed** **(This section must be completed by the Compliance Enforcement Authority):**

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**Compliance Assessment Approach Specific to PER-003-1, R3**

***This section must be completed by the Compliance Enforcement Authority***

Review the evidence to verify the Registered Entity has:

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|  | A list of system operators performing BA reliability-related tasks including the name of the operator as it appears on the certificate, the certificate number, and the level of certification. |
|  | Determine if other operating positions are located in the control room but not identified as performing BA reliability-related tasks. If yes, review evidence to validate certification is not required under R3. |
|  | Work schedules for the operating positions performing BA reliability-related tasks to verify only NERC-certified personnel worked these positions, or that non NERC-certified personnel were supervised by appropriate NERC-certified personnel, when working in positions with BA reliability-related responsibilities. |
|  | Using the information obtained above, verify all system operators performing or supervising BA reliability-related tasks obtained and maintained one of the following NERC certificates:   * Reliability Operator * Balancing, Interchange and Transmission Operator * Balancing and Interchange Operator |
|  | Audit Team may contact NERC to confirm the certification information are valid. |
| **Note to Auditor:**   * Areas of Competency are addressed when the certification exams are developed. Compliance is demonstrated by the system operators holding the required level of certification. * Documentation of compliance is for the audit period unless otherwise determined. * Evidence for non-certified positions might include task lists, job descriptions, etc. showing no BA reliability-related tasks performed, or work schedules demonstrating that a NERC certified employee was working with/supervising the non NERC-certified employee. | |

**Auditor Notes:**

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# **Compliance Finding Summary**

***This section must be completed by the Compliance Enforcement Authority***

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| **Req.** | **NF** | **PV** | **OEA** | **NA** | **Statement** |
| **1** |  |  |  |  |  |
| **2** |  |  |  |  |  |
| **3** |  |  |  |  |  |

# **Additional Information:**

**Reliability Standard**

**PER-003-1 — Operating Personnel Credentials**

**A. Introduction**

**1. Title: Operating Personnel Credentials**

**2. Number: PER-003-1**

**3. Purpose:** To ensure that System Operators performing the reliability-related tasks of the Reliability Coordinator, Balancing Authority and Transmission Operator are certified through the NERC System Operator Certification Program when filling a Real-time operating position responsible for control of the Bulk Electric System.

**4. Applicability:**

**4.1.** Reliability Coordinator

**4.2.** Transmission Operator

**4.3.** Balancing Authority

**5. Effective Date:**

**5.1.** In those jurisdictions where regulatory approval is required, this standard shall become effective the first calendar day of the first calendar quarter twelve months after applicable regulatory approval. In those jurisdictions where no regulatory approval is required, this standard shall become effective the first calendar day of the first calendar quarter twelve months after Board of Trustees adoption.

**B. Requirements**

**R1.** Each Reliability Coordinator shall staff its Real-time operating positions performing Reliability Coordinator reliability-related tasks with System Operators who have demonstrated minimum competency in the areas listed by obtaining and maintaining a valid NERC Reliability Operator certificate (1) : *[Risk Factor: High][Time Horizon: Real-time Operations]*

1.1. Areas of Competency

1.1.1. Resource and demand balancing

1.1.2. Transmission operations

1.1.3. Emergency preparedness and operations

1.1.4. System operations

1.1.5. Protection and control

1.1.6. Voltage and reactive

1.1.7. Interchange scheduling and coordination

1.1.8. Interconnection reliability operations and coordination

**R2.** Each Transmission Operator shall staff its Real-time operating positions performing Transmission Operator reliability-related tasks with System Operators who have demonstrated minimum competency in the areas listed by obtaining and maintaining one of the following valid NERC certificates (1) : *[Risk Factor: High][Time Horizon: Real-time Operations]*:

2.1. Areas of Competency

2.1.1. Transmission operations

2.1.2. Emergency preparedness and operations

2.1.3. System operations

2.1.4. Protection and control

2.1.5. Voltage and reactive

2.2. Certificates

• Reliability Operator

• Balancing, Interchange and Transmission Operator

• Transmission Operator

**R3.** Each Balancing Authority shall staff its Real-time operating positions performing Balancing Authority reliability-related tasks with System Operators who have demonstrated minimum competency in the areas listed by obtaining and maintaining one of the following valid NERC certificates (1) : *[Risk Factor: High][Time Horizon: Real-time Operations]*:

3.1. Areas of Competency

3.1.1. Resources and demand balancing

3.1.2. Emergency preparedness and operations

3.1.3. System operations

3.1.4. Interchange scheduling and coordination

3.2. Certificates

• Reliability Operator

• Balancing, Interchange and Transmission Operator

• Balancing and Interchange Operator

**C. Measures**

**M1.** Each Reliability Coordinator, Transmission Operator and Balancing Authority shall have the following evidence to show that it staffed its Real-time operating positions performing reliability-related tasks with System Operators who have demonstrated the applicable minimum competency by obtaining and maintaining the appropriate, valid NERC certificate (R1, R2, R3):

**M1.1** A list of Real-time operating positions.

**M1.2** A list of System Operators assigned to its Real-time operating positions.

**M1.3** A copy of each of its System Operator’s NERC certificate or NERC certificate number with expiration date which demonstrates compliance with the applicable Areas of Competency.

**M1.4** Work schedules, work logs, or other equivalent evidence showing which System Operators were assigned to work in Real-time operating positions.

**D. Compliance**

**1. Compliance Monitoring Process**

**1.1. Compliance Monitoring Authority**

For Reliability Coordinators and other functional entities that work for their Regional Entity, the ERO shall serve as the Compliance Enforcement Authority.

For entities that do not work for the Regional Entity, the Regional Entity shall serve as the Compliance Enforcement Authority.

**1.2. Compliance Monitoring and Enforcement Processes:**

Compliance Audits

Self-Certifications

Spot Checking

Compliance Violation Investigations

Self-Reporting

Complaints

**1.3. Data Retention**

Each Reliability Coordinator, Transmission Operator and Balancing Authority shall keep data or evidence to show compliance for three years or since its last compliance audit, whichever time frame is the greatest, unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

If a Reliability Coordinator, Transmission Operator or Balancing Authority is found non-compliant, it shall keep information related to the non-compliance until found compliant or the time period specified above, whichever is longer.

The Compliance Enforcement Authority shall keep the last audit records and all requested and submitted subsequent records.

**1.4. Additional Compliance Information**

None.

**Sampling Methodology (if applicable)**

Sampling is essential for auditing compliance with NERC Reliability Standards since it is not always possible

or practical to test 100% of either the equipment, documentation, or both, associated with the full suite of enforceable standards. The [Sampling Methodology Guidelines and Criteria](http://www.nerc.com/files/Sampling%20Methodology%20Guidelines%20and%20Criteria_08_01_2011.pdf), or sample guidelines, provided by the Electric Reliability Organization help to establish a minimum sample set for monitoring and enforcement uses in audits of NERC Reliability Standards.

There are two approaches to sampling: statistical and non-statistical, and choosing which to use depends on the auditor’s objectives. Both are represented in the sample guideline in line with standard practices for their use. The Audit Team Lead may determine if the scope of the audit samples should be reduced to levels below those established in the sample guideline. In doing so, the audit team will document the rationale for reducing the scope of the sample population in the RSAW or audit report.

Additionally, separate from the audit, the registered entity may use this methodology to determine the sample population to test in order to provide themselves reasonable assurance that management’s expectations are being met by the organization.

**Regulatory Language**

Order Approving Reliability Standard 136 F.E.R.C. ¶ 61,177 (2011)

In Order No. 693, the Commission. . .directed the ERO to modify Reliability Standard PER-003-0 to: (i) specify the minimum competencies that a system operator must demonstrate to become and remain a certified system operator; and (ii) identify the minimum competencies operating personnel must demonstrate to be certified. In addition, the Commission, noting that there are some long tenured unionized transmission operators who are very capable operators but who may be unable to secure certification, directed the ERO to consider grandfathering certification requirements for such transmission operator personnel. (P 6)

With respect to the Order No. 693 directive that NERC consider "grandfathering" certain transmission operator personnel, NERC states [in its petition] that the standard drafting team extensively considered the issue and decided against allowing grandfathering. NERC states that the major factors for not allowing grandfathering were as follows. First, the standards drafting team (SDT) concluded that passing a certification examination is NERC's only available method to verify the minimum knowledge level of a System Operator. Second, the SDT found no convincing evidence that experienced system operators would not be able to pass a certification exam. Third, the SDT did not find that employers may face a labor relations issue if part of its workforce were required to hold a NERC System Operator Certification. Last, in response to the concern about smaller entities being able to retain personnel once they obtain a NERC System Operator Certification, which may make such system operators more "marketable," the SDT found that the importance of verifying a system operator's competency through the certification process is more important than possible personnel retention concerns. (P 12)

The Commission finds Reliability Standard PER-003-1 to be just, reasonable,   not unduly discriminatory or preferential and in the public interest. By specifying the minimum competencies which must be demonstrated to obtain and maintain a NERC System Operator Certification, PER-003-1 improves the currently-effective Reliability Standard PER-003-0, and addresses the relevant directive in Order No. 693. The Commission also finds that the comprehensive discussion of "grandfathering" in NERC's petition demonstrates that the standard drafting team met the Commission's second directive to consider that issue. Accordingly, the Commission approves Reliability Standard PER-003-1 and the proposed implementation plan. Specifically, the "effective date" for mandatory compliance with Reliability Standard PER-003-1 will be the first day of the first calendar quarter twelve months after the date of Commission approval. In addition the Commission approves the retirement of currently-effective Reliability Standard PER-003-0 concurrent with the effective date of Reliability Standard PER-003-1. (PP 15 – 17)

**Revision History**

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| --- | --- | --- |
| **REVISION DATE** | **REVISION DETAILS** | **REVISED BY** |
| 1/24/2013 | New RSAW | RSAW WG |
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1. NERC developed this Reliability Standard Audit Worksheet (RSAW) language in order to facilitate NERC’s and the Regional Entities’ assessment of a registered entity’s compliance with this Reliability Standard. The NERC RSAW language is written to specific versions of each NERC Reliability Standard. Entities using this RSAW should choose the version of the RSAW applicable to the Reliability Standard being assessed. While the information included in this RSAW provides some of the methodology that NERC has elected to use to assess compliance with the requirements of the Reliability Standard, this document should not be treated as a substitute for the Reliability Standard or viewed as additional Reliability Standard requirements. In all cases, the Regional Entity should rely on the language contained in the Reliability Standard itself, and not on the language contained in this RSAW, to determine compliance with the Reliability Standard. NERC’s Reliability Standards can be found on NERC’s website at <http://www.nerc.com/page.php?cid=2|20>. Additionally, NERC Reliability Standards are updated frequently, and this RSAW may not necessarily be updated with the same frequency. Therefore, it is imperative that entities treat this RSAW as a reference document only, and not as a substitute or replacement for the Reliability Standard. It is the responsibility of the registered entity to verify its compliance with the latest approved version of the Reliability Standards, by the applicable governmental authority, relevant to its registration status.

   The NERC RSAW language contained within this document provides a non‑exclusive list, for informational purposes only, of examples of the types of evidence a registered entity may produce or may be asked to produce to demonstrate compliance with the Reliability Standard. A registered entity’s adherence to the examples contained within this RSAW does not necessarily constitute compliance with the applicable Reliability Standard, and NERC and the Regional Entity using this RSAW reserves the right to request additional evidence from the registered entity that is not included in this RSAW. Additionally, this RSAW includes excerpts from FERC Orders and other regulatory references. The FERC Order cites are provided for ease of reference only, and this document does not necessarily include all applicable Order provisions. In the event of a discrepancy between FERC Orders, and the language included in this document, FERC Orders shall prevail. [↑](#footnote-ref-1)