

Consideration of Comments on Initial Ballot — PER-005-1 — System Personnel Training (Project 2006-01)

Summary Consideration: The majority of negative voters expressed concerns surrounding the two (2) year implementation time frame, the treatment of existing training programs and the mandating of the use of simulators. The SDT explained that FERC had expressed concerns with a longer implementation period since the need for improvements to System Operator training was initially identified in the 2003 Blackout Report and that an entity would conceivably have more time than two (2) years to implement the program. Concerning the treatment of existing training programs, the SDT explained that existing training programs would have to be verified against the Standard to ensure compliance with the use of a systematic approach to training. The SDT also explained that the use of a simulator was directed by a FERC Order and that the SDT had expanded the concept of using a simulator to include simulation technology, virtual technology or other technology that replicates the operational behavior of the BES to increase flexibility for an organization to meet the requirement of the standard using the most cost effective solution. The SDT further explained that it proposed the following language as delineating factors for determining those entities that must use simulation technology in their training programs.

“. . . that has operational authority or control over Facilities with established IROLs or has established operating guides or protection systems to mitigate IROL violations. . .”

The above language was proposed as an alternative that is an, equally efficient and effective method of achieving the intent of FERC’s directive to include “the use of simulators by reliability coordinators, transmission operators and balancing authorities that have operational control over a significant portion of load and generation.”

A few of the negative voters are concerned with the definition of the twelve (12) month period for emergency training, the use of a systematic approach to training and that the standard uses a “how-to” approach. With regards to defining the twelve (12) month period for emergency operations training, the SDT explained that it was allowing an entity the flexibility to define this period on a case-by-case basis. The SDT further explained that by allowing an entity this flexibility it was providing for the situation of a new hire late in the calendar year. Concerning the use of a systematic approach to training, the SDT explained this was based on the industry approved SAR requiring that a systematic approach to training be applied to all reliability-related system operator training. The SDT further explained that the requirement to use a systematic approach to training was reinforced as a directive from FERC Order 693. With regards to the concern that the standard uses a “how-to” approach, the SDT explained that the Reliability Standards Development Procedure Version 6.1 stated that “Each requirement identifies who is responsible and what action is to be performed or what outcome is to be achieved.”, therefore allowing requirements to be developed utilizing the “how – to approach”.

Voter	Entity	Segment	Vote	Comment
John Bussman	Associated Electric Cooperative, Inc.	1	Negative	PER-002 provides adequate requirements for training to ensure that a system operator is competent to perform the system operator duties.
Response: The need for improvements to system operator training was identified in the 2003 Black-out Report. Based on this report the SAR was developed and approved by the industry to improve system operator training practices. Lastly, FERC Order 693 expanded the training requirement through directives for modifications to the PER-002 standard.				
Tony Kroskey	Brazos Electric Power	1	Negative	It is not clear to what extent jurisdiction and regulatory requirements can apply.

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	Cooperative, Inc.			
<p>Response: The SPT SDT was unsure of the exact nature of your question. If you are concerned about the applicability of this standard to your organization, please refer to the NERC Functional Model and the Statement of Compliance Registry Criteria. These documents provide the current functional type definitions needed by NERC to fulfill its obligation as the Electric Reliability Organization to identify and register all entities that meet the criteria for inclusion in the compliance registry. If your concern is related to regulatory jurisdiction, consult with your legal department.</p>				
Paul Rocha	CenterPoint Energy	1	Negative	Regarding the SDT's Consideration of Comments to the 4th Draft, CenterPoint Energy appreciates that in R3.1 "the SDT is not mandating a minimum number of hours that an entity must train on a simulator"; however, as CenterPoint Energy stated in its comments, the current wording in the standard can still be interpreted such that ALL 32 hours of emergency operations training must be accomplished using simulation technology. Consequently, CenterPoint Energy is voting "negative". CenterPoint Energy again submits the following minor edit, which would clarify R3.1: Each Reliability Coordinator, Balancing Authority and Transmission Operator that has operational authority or control over Facilities with established IROLs or has established operating guides or protection systems to mitigate IROL violations shall provide each System Operator with emergency operations training using [delete "using" and insert instead "including the use of"] simulation technology such as a simulator, virtual technology or other technology that replicates the operation behavior of the BES during normal emergency conditions.
<p>Response: Based on industry comments, the SPT SDT feels the present wording provides sufficient clarity to the requirement.</p>				
Joseph Dobes	Northern Indiana Public Service Co.	1	Negative	The existing 3-year program has been vetted throughout the industry and is adequate. Changing the requirement to 2 years would require additional staff.
<p>Response: If you are referring to the 3 year operator re-certification program, this is outside the scope of the industry approved SAR. If you are referring to the 24 month implementation period, FERC has expressed concerns regarding the implementation time frame of this standard since the need for improvements to system operator training was identified in the 2003 Black-out Report and FERC Order 693 directives to establish the criteria for system operator training.</p> <p>Industry consensus and the SPT SDT support a 24 month implementation period. The industry should have adequate time to begin preparation to implement Requirement 1 and Requirement 2 of this standard based on the following typical process (with the exception of Canada):</p> <ul style="list-style-type: none"> • NERC filing of BOT approved standard with FERC 				

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<ul style="list-style-type: none"> • FERC staff review for development of NOPR • NOPR comment period • FERC staff review of NOPR comments • FERC issuing of final rule • Publish in Federal Register • 24 months after the first day of the first calendar quarter following regulatory approval 				
Ray Mammarella	PP&L, Inc.	1	Negative	<p>Systematic approach to training, while a valid training process is not without its shortcomings, or the only acceptable method to develop training. This is especially true in the area of just-in-time training. Mandating a training development process is not conducive to a reliability standard, and would be difficult to monitor for compliance.</p> <p>The standard as written mandates a "How-to" approach which is not within scope of a reliability standard. This standard would divert the already scarce training resources away from training operators to the administrative work of documenting every step of the training process to ensure compliance with the standard. It could have the unintended consequence of actually reducing the number of training hours the operators receive. Ultimately, training effectiveness will be measured by compliance with existing reliability standards.</p>
<p>Response: This standard is based on the approved SAR and requires that a systematic approach to training be applied to all system operator training for reliability-related tasks. The requirement to use a systematic approach to training was reinforced as a directive from FERC in Order 693. In addition, there are multiple variations of a systematic approach to training and this standard is not prescribing the use of any specific systematic approach to training methodology. The Reference Document associated with this standard contains links to various systematic approach to training methodologies.</p> <p>Reliability Standards Development Procedure Version 6.1 states that "Each requirement identifies who is responsible and what action is to be performed or what outcome is to be achieved.", therefore allowing requirements to be developed utilizing the "how – to approach".</p>				

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Mark A. Heimbach	PPL Generation LLC	5	Negative	<p>Systematic approach to training, while a valid training process is not without its shortcomings, or the only acceptable method to develop training. This is especially true in the area of just-in-time training. Mandating a training development process is not conducive to a reliability standard, and would be difficult to monitor for compliance.</p> <p>The standard as written mandates a "How-to" approach which is not within scope of a reliability standard. This standard would divert the already scarce training resources away from training operators to the administrative work of documenting every step of the training process to ensure compliance with the standard. It could have the unintended consequence of actually reducing the number of training hours the operators receive. Ultimately, training effectiveness will be measured by compliance with existing reliability standards.</p>
<p>Response: This standard is based on the approved SAR and requires that a systematic approach to training be applied to all system operator training for reliability-related tasks. The requirement to use a systematic approach to training was reinforced as a directive from FERC Order 693. In addition, there are multiple variations of a systematic approach to training and this standard is not prescribing the use of any specific systematic approach to training methodology. The Reference Document associated with this standard contains links to various systematic approach to training methodologies.</p> <p>Reliability Standards Development Procedure Version 6.1 states that "Each requirement identifies who is responsible and what action is to be performed or what outcome is to be achieved.", therefore allowing requirements to be developed utilizing the "how – to approach".</p>				
Catherine Koch	Puget Sound Energy, Inc.	1	Negative	<p>The term "verify" needs further clarification to understand whether the regional compliance enforcement or FERC based on the Order 693 directive would expect verification to be obtained via simulator results. M2 does not mention the term simulator when discussing evidence examples and it is clear the expectation for use of a simulator per R3.1, but the vagueness of "verify" in R2 and R2.1 and the FERC focus on simulator use is cause for concern when audited. In addition it is unclear what extent of "modification" needs to drive the verification on the modified task within 6 months. Training schedules can be tricky to achieve and having to insert training relative to something considered to be minor could be difficult to arrange depending on the expectation of "verify" again. Please confirm that the use of a simulator for training is not required in any requirement but R3.1.</p> <p>The mandate of simulator use in R3.1 based on identified operational</p>

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				authority or control over facilities with established IROLs is a concern because it is unclear how the WECC region would interpret this based on discussions of IROL versus SOLs. We request clarity regarding how the WECC region would interpret this. What WECC document points to the entities that this is applicable to? Is this identified by the Major WECC Transfer Paths in the BES table? We appreciate the difficulty in determine how to define simulator required entities and appreciate the efforts to narrow the applicability to those entities that have the greatest impact on the BES.
<p>Response: A simulator may be used to verify competency, however, it is not required. Each entity shall determine its own process for compliance with the standard.</p> <p>With respect to your comment concerning the use of IROL as a delineating factor for determining the need for using simulation technologies, the SDT continues to stress it is not just IROLs but also "...or has established operating guides or protection systems to mitigate IROL violations." If further clarification about the implementation and applicability for this Requirement is needed with respect to specific documentation that may exist within WECC, please contact WECC.</p>				
Terry L. Blackwell (1) Zack Dusenbury (3) Suzanne Ritter (6)	Santee Cooper	1,3,6	Negative	It's not feasible to implement R1 and R2 in 24 months with available operator time for identification and required verification of job tasks.
<p>Response: FERC has expressed concerns regarding the implementation time frame of this standard since the need for improvements to system operator training was identified in the 2003 Black-out Report and FERC Order 693 directives to establish the criteria for system operator training.</p> <p>Industry consensus and the SPT SDT support a 24 month implementation period. The industry should have adequate time to begin preparation to implement Requirement 1 and Requirement 2 of this standard based on the following typical process (with the exception of Canada):</p> <ul style="list-style-type: none"> • NERC filing of BOT approved standard with FERC • FERC staff review for development of NOPR • NOPR comment period • FERC staff review of NOPR comments • FERC issuing of final rule 				

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<ul style="list-style-type: none"> Publish in Federal Register 24 months after the first day of the first calendar quarter following regulatory approval 				
Horace Stephen Williamson	Southern Company Services, Inc.	1	Negative	<p>The Standard Drafting Team did not follow through with the suggestion for the effective date to be 36 months for both standards.</p> <p>Additionally, industry needs clear direction on existing training programs.</p> <p>The proposed standard does not provide guidance in determining what constitutes “a company-specific” reliability-related task. Consequently, it is subjective. The task list should, at a minimum, fully support the function type definition contained in the NERC Statement of Compliance Registry Criteria.</p> <p>We disagree with mandating the use of a training simulator. The purchase, model maintenance and operation of a simulator can be a financial burden on a smaller entity with an IROL</p> <p>Finally, we still have concerns that auditors will consistently disagree with the composition of an entity’s reliability related task list.</p>
<p>Response: FERC has expressed concerns regarding the implementation time frame of this standard since the need for improvements to system operator training was identified in the 2003 Black-out Report and FERC Order 693 directives to establish the criteria for system operator training.</p> <p>Industry consensus and the SPT SDT support a 24 month implementation period. The industry should have adequate time to begin preparation to implement Requirement 1 and Requirement 2 of this standard based on the following typical process (with the exception of Canada):</p> <ul style="list-style-type: none"> NERC filing of BOT approved standard with FERC FERC staff review for development of NOPR NOPR comment period FERC staff review of NOPR comments 				

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Roger D. Green	Southern Company Services, Inc.	5	Negative	<p>The effective date should be 36 months for this standard.</p> <p>Additionally, industry needs clear direction on existing training programs.</p> <p>The proposed standard does not provide guidance in determining what constitutes “a company-specific” reliability-related task. Consequently, it is subjective. The task list should, at a minimum, fully support the function type definition contained in the NERC Statement of Compliance Registry Criteria.</p> <p>We disagree with mandating the use of a training simulator.</p> <p>Finally, we still have concerns that auditors will consistently disagree with the composition of an entity's reliability related task list.</p>
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Robin Hurst	Alabama Power Company	3	Negative	The Standard Drafting Team did not follow through with the suggestion for the effective date to be 36 months for both standards. Additionally, industry needs clear direction on existing training programs. The proposed standard does not provide guidance in determining what constitutes "a company-specific" reliability-related task. Consequently, it is subjective. The task list should, at a minimum, fully support the function type definition contained in the NERC Statement of Compliance Registry Criteria. We disagree with mandating the use of a training simulator. The purchase, model maintenance and operation of a simulator can be a financial burden on a smaller entity with an IROL. Finally, we still have concerns that auditors will consistently disagree with the composition of an entity's reliability related task list.

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Leslie Sibert	Georgia Power Company	3	Negative	<p>The Standard Drafting Team did not follow through with the suggestion for the effective date to be 36 months for both standards. Additionally, industry needs clear direction on existing training programs. The proposed standard does not provide guidance in determining what constitutes "a company-specific" reliability-related task. Consequently, it is subjective. The task list should, at a minimum, fully support the function type definition contained in the NERC Statement of Compliance Registry Criteria. We disagree with mandating the use of a training simulator. The purchase, model maintenance and operation of a simulator can be a financial burden on a smaller entity with an IROL. Finally, we still have concerns that auditors will consistently disagree with the composition of an entity's reliability related task list.</p>
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Gwen S Frazier	Gulf Power Company	3	Negative	<p>The Standard Drafting Team did not follow through with the suggestion for the effective date to be 36 months for both standards. Additionally, industry needs clear direction on existing training programs. The proposed standard does not provide guidance in determining what constitutes “a company-specific” reliability-related task. Consequently, it is subjective. The task list should, at a minimum, fully support the function type definition contained in the NERC Statement of Compliance Registry Criteria. We disagree with mandating the use of a training simulator. The purchase, model maintenance and operation of a simulator can be a financial burden on a smaller entity with an IROL. Finally, we still have concerns that auditors will consistently disagree with the composition of an entity’s reliability related task list.</p>
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Don Horsley	Mississippi Power	3	Negative	The Standard Drafting Team did not follow through with the suggestion for the effective date to be 36 months for both standards. Additionally, industry needs clear direction on existing training programs. The proposed standard does not provide guidance in determining what constitutes "a company-specific" reliability-related task. Consequently, it is subjective. The task list should, at a minimum, fully support the function type definition contained in the NERC Statement of Compliance Registry Criteria. We disagree with mandating the use of a training simulator. The purchase, model maintenance and operation of a simulator can be a financial burden on a smaller entity with an IROL. Finally, we still have concerns that auditors will consistently disagree with the composition of an entity's reliability related task list.
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<p>Functional Model and the Statement of Compliance Registry Criteria provide the current functional type definitions to develop its list of BES company-specific reliability-related tasks.</p> <p>The requirement to use a simulator was a directive from FERC Order 693. The SDT provided an alternative approach of using simulation technology such as a simulator, virtual technology or other technology. The SPT SDT believes the standard as developed achieves the reliability goals and allows applicable entity the flexibility to comply using the most cost effective method available.</p> <p>The SDT can not address compliance audit practices. However, the intent of this requirement is to ensure a task list exists, the tasks are company specific and that the tasks are reliability related.</p>				
Kim Warren	Independent Electricity System Operator	2	Negative	<p>The IESO maintains that Requirement 3.1 is overly prescriptive on how to accomplish training. The objective of NERC standards should be to define what needs to be done to ensure the reliability of the BES - in this case to ensure the RC, TOP and BA develop and implement a training program for its System Operators to deal with normal and emergency situations. How to achieve this training to meet the needed competency level should be left to the responsible entity.</p> <p>The effectiveness of the methods employed by the entity will then be evaluated through the NERC Operator Certification exercise.</p> <p>Further, the IESO wishes to know whether the "simulation technology such as a simulator, virtual technology, or other technology that replicates the operational behavior of the BES" may be "generic" in nature, intended to develop and assess the general competencies required of System Operators, or must it be specific to the BES of the BA, RC, or TOP and mimic the behavior of their BES, providing realistic experiences with the operator's actual BES.</p> <p>It is unclear from a compliance perspective, what is intended by "virtual technology, or other technology". We strongly believe that robust "simulation practices" achieve as much or more than "simulation technologies" and feel that if the standard does prescribe "how", then the former element, "simulation practices", needs to be included.</p>
<p>Response: Reliability Standards Development Procedure Version 6.1 states that "Each requirement identifies who is responsible and what action is to be performed or what outcome is to be achieved.", therefore allowing requirements to be developed utilizing the "how – to approach".</p>				

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<p>The NERC Operator Certification is outside the scope of the industry approved SAR used to develop this standard. Certification does not verify that a system operator can perform company-specific reliability-related tasks.</p> <p>The intent of the standard is to allow for simulation training that replicates the operational behavior of the BES during normal and emergency conditions.</p> <p>The SPT SDT believes the standard as developed achieves the reliability goals and allows an applicable entity the flexibility to comply using the most cost effective method available. The Reference Document associated with this standard provides additional information concerning simulation technology.</p>				
Tom Bowe	PJM Interconnection, L.L.C.	2	Negative	<p>PJM believes that SAT, while a valid training process is not without its shortcomings or the only acceptable method to develop training. This is especially true in the area of just-in-time training. Mandating a training development process is not conducive to a reliability standard, and would be difficult to monitor for compliance.</p> <p>The standard as written mandates a "How-to" approach which is not within the scope of a reliability standard. This standard would divert already scarce training resources away from training operators to the administrative work of documenting every step of the training process to ensure compliance with the standard. It could have the unintended consequence of actually reducing the number of training hours that operators receive.</p> <p>Ultimately, training effectiveness will be measured by compliance with existing reliability standards. That being said, the objective is to ensure qualified system operators. PJM supports the parallel implementation of hourly training requirements for continuing education as well as initial training. NERC has a Continuing Education Program that ensures high quality training, and sets forth a structure using Continuing Education Hours (CEHs) for "NERC Certified Operators". While NERC has continually stated that the CEH program is separate from the standards, little justification has been provided for this separation. Thus, redundant and possibly conflicting training requirements are being proposed. Utilizing the CEH approach, PJM would support the increase of the training time required under R3 to at least 100 CEHs annually with category breakdown (i.e. simulation,</p>

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				standards, EOP) as specified in the NERC Certification program. PJM also proposes that for new operators, R2 be replaced with a fixed training hour requirement that is broken down into specific areas (such as job assignments, NERC Standards, tools, internal procedures, etc.). This initial training requirement would be analogous to the CEH program for existing operators, but focused on specific categories related to the initial requirements of the job.
<p>Response: This standard is based on the approved SAR and requires that a systematic approach to training be applied to all system operator training for reliability-related tasks. The requirement to use a systematic approach to training was reinforced as a directive from FERC Order 693. In addition, there are multiple variations of a systematic approach to training and this standard is not prescribing the use of any specific systematic approach to training methodology. The Reference Document associated with this standard contains links to various systematic approach to training methodologies.</p> <p>Reliability Standards Development Procedure Version 6.1 states that “Each requirement identifies who is responsible and what action is to be performed or what outcome is to be achieved.”, therefore allowing requirements to be developed utilizing the “how – to approach”.</p> <p>The NERC Certification Process or NERC Continuing Education (CE) Program is not within the scope of this standard. An entity can use the CE Program to meet this standard if the CE training meets the requirements in this standard (i.e., addresses company specific reliability-related tasks). Additionally, the industry is in support of the standard as presently written.</p>				
Jalal (John) Babik (3) Mike Garton (5) Louis S Slade (6)	Dominion Resources, Inc.	3,5,6	Negative	In support of PJM comments
<p>Response: This standard is based on the approved SAR and requires that a systematic approach to training be applied to all system operator training for reliability-related tasks. The requirement to use a systematic approach to training was reinforced as a directive from FERC Order 693. In addition, there are multiple variations of a systematic approach to training and this standard is not prescribing the use of any specific systematic approach to training methodology. The Reference Document associated with this standard contains links to various systematic approach to training methodologies.</p> <p>Reliability Standards Development Procedure Version 6.1 states that “Each requirement identifies who is responsible and what action is to be performed or what outcome is to be achieved.”, therefore allowing requirements to be developed utilizing the “how – to approach”.</p> <p>The NERC Certification Process or NERC Continuing Education (CE) Program is not within the scope of this standard. An entity can use the CE Program to meet this standard if the CE training meets the requirements in this standard (i.e., addresses company specific reliability-related tasks). Additionally, the industry is in support of the standard as presently written.</p>				

Voter	Entity	Segment	Vote	Comment
William SeDoris	Northern Indiana Public Service Co.	3	Negative	Concern is with the 2-year window.
<p>Response: If you are referring to the 24 month implementation period, FERC has expressed concerns regarding the implementation time frame of this standard since the need for improvements to system operator training was identified in the 2003 Black-out Report and FERC Order 693 directives to establish the criteria for system operator training.</p> <p>Industry consensus and the SPT SDT support a 24 month implementation period. The industry should have adequate time to begin preparation to implement Requirement 1 and Requirement 2 of this standard based on the following typical process (with the exception of Canada):</p> <ul style="list-style-type: none"> • NERC filing of BOT approved standard with FERC • FERC staff review for development of NOPR • NOPR comment period • FERC staff review of NOPR comments • FERC issuing of final rule • Publish in Federal Register • 24 months after the first day of the first calendar quarter following regulatory approval 				
Scott Peterson	San Diego Gas & Electric	3	Negative	<p>R2.1. Should be clarified to read "Within six months of a modification of the list of the BES company-specific reliability-related tasks, ...".</p> <p>R3. The 12 month timeframe is unworkable. It will force workgroups to go to a shorter timeframe just to make sure they stay within that 12 months. This will cause training to be moved up each year after year. Change to "At least every 16 months, each ...".</p> <p>R3.1. The drafting team needs to clarify how "operational authority and control" will be interpreted in this standard. For example, if a transmission operator has turned over operational control of its system to an ISO, yet that transmission operator still has the physical control device in its control center which it utilizes under the ISO's direction, is that transmission operator subject to this requirement?</p>
<p>Response: The industry has responded in support of the standard as presently written therefore the SDT does not feel that the modification you are suggesting to Requirement R2.1 is necessary or provides any additional clarity.</p>				

Voter	Entity	Segment	Vote	Comment
<p>The SPT SDT did not intend to define the 12 month period for providing emergency operations training. The SPT SDT believes that this period should be defined by the individual entity on a case-by-case basis. The SPT SDT revised the condition for Requirement 3 from “annually” to “every 12 months” to allow for the situation of new hires late in the calendar year.</p> <p>The issue of addressing relationships related to “operational authority <i>or</i> control” between entities is outside the scope of the industry approved SAR. If you are concerned about the applicability of this standard to your organization, please refer to the NERC Functional Model and the Statement of Compliance Registry Criteria.</p>				
David Frank Ronk	Consumers Energy	4	Negative	This standard would require a complete re-structuring of training programs across the industry. Training programs that have ramped up as a result of the black-out in 2003 and that have been deemed compliant up to the possible passing of this standard. This standard is too restrictive and burdensome. a Training staff of one would need to become a training staff of three just to attempt to install a systematic program described in this standard and it would still take longer than the two years mentioned in the standard.
<p>Response: Existing training programs need to be verified against the standard for compliance.</p> <p>Industry consensus and the SPT SDT support a 24 month implementation period. The industry should have adequate time to begin preparation to implement Requirement 1 and Requirement 2 of this standard based on the following typical process (with the exception of Canada):</p> <ul style="list-style-type: none"> • NERC filing of BOT approved standard with FERC • FERC staff review for development of NOPR • NOPR comment period • FERC staff review of NOPR comments • FERC issuing of final rule • Publish in Federal Register • 24 months after the first day of the first calendar quarter following regulatory approval 				

Voter	Entity	Segment	Vote	Comment
James B Lewis	Consumers Energy	5	Negative	In our view, the proposed Standard is too restrictive and much too burdensome. Our training staff might need to triple to install a program such as that proposed. Even with a greatly increased training staff, we believe it would take much longer than the two years mentioned in the proposed Standard. Our training program was improved after the August 2003 blackout and has been deemed compliant, but we don't believe it would be should this proposed Standard pass.
<p>Response: Existing training programs need to be verified against the standard for compliance.</p> <p>Industry consensus and the SPT SDT support a 24 month implementation period. The industry should have adequate time to begin preparation to implement Requirement 1 and Requirement 2 of this standard based on the following typical process (with the exception of Canada):</p> <ul style="list-style-type: none"> • NERC filing of BOT approved standard with FERC • FERC staff review for development of NOPR • NOPR comment period • FERC staff review of NOPR comments • FERC issuing of final rule • Publish in Federal Register • 24 months after the first day of the first calendar quarter following regulatory approval 				
Kent Saathoff	Electric Reliability Council of Texas, Inc.	10	Negative	<p>R1.1 and R1.2 require training based on a "task list". A training needs analysis under a systematic approach to training (R1), coupled with verification of capability (R2) may determine that only certain tasks need training.</p> <p>R3 would be more useful in the System Operator Certification Program manual, Section 2, Credential Maintenance as a subset of the Operating Topics requirement similar to the Standards and Simulations. A 90 hour requirement (averaging 30 hours/year over the 3-year certification) would be more preferable than a more rigid 32 hours every twelve months. Providing 32 hours of training in April of one year and in May the next would be a violation of this requirement</p>

Voter	Entity	Segment	Vote	Comment
				as written.
<p>Response: Existing training programs need to be verified against the standard for compliance.</p> <p>The NERC Certification Process or NERC Continuing Education (CE) Program is not a within the scope of this standard. Additionally, the industry has responded in support of the standard as presently written.</p> <p>The SPT SDT did not intend to define the 12 month period for providing emergency operations training. The SPT SDT believes that this period should be defined by the individual entity on a case-by-case basis. The SPT SDT revised the condition for Requirement 3 from “annually” to “every 12 months” to allow for the situation of new hires late in the calendar year.</p>				
Carter B. Edge	SERC Reliability Corporation	10	Negative	<p>In order to vote “yes”, I would need to see the following changes to the standard:</p> <p>Change the training program implementation period back to 36 months (as it was in a previous draft).</p> <p>Provide clear direction on how responsible entities can incorporate their existing training materials into the established “training program” and still be compliant with R1.</p> <p>Provide a suggested (not prescriptive) list of generic tasks that could be used as a starting point to create the list of BES company-specific reliability-related tasks required by R1.1. This task list would be located in the Reference Document (as opposed to the standard itself) to give the flexibility to modify, add or remove tasks to suit the specific system.</p> <p>Remove R3.1 mandating the use of simulators, or limit the mandated use of simulators to RCs that have established IROLs in their coordinating footprint.</p> <p>Revise R3 to allow every responsible entity the flexibility to meet its emergency operations training requirement using any or all of the following types of training: drills, exercises, classes, hands-on or table-top simulation.</p>

Voter	Entity	Segment	Vote	Comment
<p>Response: FERC has expressed concerns regarding the implementation time frame of this standard since the need for improvements to system operator training was identified in the 2003 Black-out Report and FERC Order 693 directives to establish the criteria for system operator training.</p> <p>Industry consensus and the SPT SDT support a 24 month implementation period. The industry should have adequate time to begin preparation to implement Requirement 1 and Requirement 2 of this standard based on the following typical process (with the exception of Canada):</p> <ul style="list-style-type: none"> • NERC filing of BOT approved standard with FERC • FERC staff review for development of NOPR • NOPR comment period • FERC staff review of NOPR comments • FERC issuing of final rule • Publish in Federal Register • 24 months after the first day of the first calendar quarter following regulatory approval <p>Existing training programs need to be verified against the standard for compliance.</p> <p>The System Operator Task List was removed from the standard based on industry comments received from previous postings. The Reference Document associated with the Standard details some topics that could be considered and included in a task list. The SDT agrees that the NERC Functional Model and the Statement of Compliance Registry Criteria provide the current functional type definitions to develop its list of BES company-specific reliability-related tasks.</p> <p>The SPT SDT is responding to directives included in FERC Order 693. Order 693 includes a directive to require the use of simulators by reliability coordinators, transmission operators and balancing authorities that have operational control over a significant portion of load and generation. The SDT provided an alternative approach of using simulation technology such as a simulator, virtual technology or other technology.</p> <p>In addition, the SDT used IROLs as a delineating criterion for those entities that must provide emergency operations training using simulation technology such as a simulator, virtual technology, or other technology that replicates the operational behavior of the BES during normal and emergency conditions.</p> <p>The SPT SDT believes that Requirement R3 as written allows the applicable entity the flexibility to comply using various training methodologies.</p>				

Voter	Entity	Segment	Vote	Comment
Kirit S. Shah (1) Mark Peters (3)	Ameren Services	1,3	Affirmative	<p>We have voted affirmatively; however, we recommend that the drafting team carefully consider the following comments:</p> <p>For the Standard PER-004-2 :</p> <p>(1) The purpose of this standard is to address staffing. The requirement R2 in no way addresses staffing. Therefore, it should be eliminated from this standard and moved to the appropriate IRO standard. If R2 is about training on SOLs and IROs, then it should specifically state that.</p> <p>(2) This standard does not have any measures. How can there be a reliability standard without any measures?</p> <p>For the Standard PER-005-1:</p> <p>(1) Add the words "review and" in R1.1.1 to read "Each RC, BA, and TOP shall review and update its list of ..."</p> <p>(2) Requirement R1.3 should specify when/how often the training should be delivered and to whom (Operators? Senior management?)</p> <p>(3) The numbering of Measures should match the Requirement numbering. For example M1 for R1 and M1.1.2 for R1.1.2 etc. If there are no measures (why not, as we questioned earlier) then state "No measure" alongside to maintain the matching numbering system between Measures and Requirements.</p>
<p>Response: Thank you for your affirmative response and your clarifying remarks.</p> <p>PER-004-2 Requirement R2 and its applicable measures are not within the scope of this standard. The SDT encourages you to submit a SAR to modify PER-004-2 through the Standards Development Process.</p> <p>The SPT SDT believes that in order to update a task list it first must be reviewed. Therefore the SPT SDT does not feel that a change in the wording is necessary and is not supported by the industry.</p> <p>As stated in the purpose statement of the standard and in Requirement 1 (and associated sub-requirements) this standard applies to System Operators.</p>				

Voter	Entity	Segment	Vote	Comment
<p>The SPT SDT incorporated the sub-requirement measures (where not specifically stated) into the measures for the Requirement.</p>				
Sam Dwyer	Amerenue	5	Affirmative	<p>We have voted affirmatively; however, we recommend that the drafting team carefully consider the following comments:</p> <p>For the Standard PER-004-2 :</p> <p>(1) The purpose of this standard is to address staffing. The requirement R2 in no way addresses staffing. Therefore, it should be eliminated from this standard and moved to the appropriate IRO standard. If R2 is about training on SOLs and IROs, then it should specifically state that.</p> <p>(2) This standard does not have any measures. How can there be a reliability standard without any measures?</p> <p>For the Standard PER-005-1 :</p> <p>(1) Add the words "review and" in R1.1.1 to read "Each RC, BA, and TOP shall review and update its list of ..."</p> <p>(2) Requirement R1.3 should specify when/how often the training should be delivered and to whom (Operators? senior management?)</p> <p>(3) The numbering of Measures should match the Requirement numbering. For example M1 for R1 and M1.1.2 for R1.1.2 etc. If there are no measures (why not, as we questioned earlier) then state "No measure" alongside to maintain the matching numbering system between Measures and Requirements.</p>
<p>Response: Thank you for your affirmative response and your clarifying remarks.</p> <p>PER-004-2 Requirement R2 and its applicable measures are not a within the scope of this standard. The SDT encourages you to submit a SAR to modify PER-004-2 through the Standards Development Process.</p> <p>The SPT SDT believes that in order to update a task list it first must be reviewed. Therefore the SPT SDT does not feel that a change in the wording is necessary and is not supported by the industry.</p>				

Voter	Entity	Segment	Vote	Comment
<p>As stated in the purpose statement of the standard and in Requirement 1 (and associated sub-requirements) this standard applies to System Operators.</p>				
<p>The SPT SDT incorporated the sub-requirement measures (where not specifically stated) into the measures for the Requirement.</p>				
Jason Shaver	American Transmission Company, LLC	1	Affirmative	<p>After reviewing the VRF's and VSLs it's our opinion that the proposed VRFs and VSLs may not pass FERC approval. FERC recently posted a NOPR on FAC-010, FAC-011 and FAC-014 in which they made specific observations. (Docket No. RM08-11-000 Issued October 16th) Paragraph 18 of the above mentioned order:</p> <p>(VRF) "...NERC will assign a violation risk factor for each requirement of a Reliability Standard that relates to the expected or potential impact of a violation of the requirement on the reliability of the Bulk Power System." The SDT has not assigned VRF's to sub-requirements.</p> <p>Paragraph 20 of the above mentioned order: (VSL) "... (4) violation severity level assignment should be based on a single violation, not a cumulative number of violations." VSL's for Requirements 2 and 3: The proposed VSLs for requirements 2 and 3 are currently based on a cumulative violation and therefore do not pass FERC's guideline. We believe that the SDT should review the above mentioned FERC NORP and make a decision if this project should be moved forward prior to addressing these issues.</p>
<p>Response: As you have stated in your comments the FERC document referenced is a Notice of Proposed Ruling (NOPR) and not a final ruling.</p>				
<p>With respect to your concerns on the Violation Risk Factors (VRFs), the VRFs for this standard were developed in accordance with the current Drafting Team Guidelines. In addition, FERC has issued final rulings with only the main Requirement (not sub-requirements) having an associated VRF.</p>				
<p>The Violation Severity Levels (VSLs) for this standard were developed in accordance with the current VSL Development Guidelines.</p>				

Voter	Entity	Segment	Vote	Comment
Donald S. Watkins (1) Rebecca Berdahl (3) Francis J Halpin (5) Brenda S Anderson (6)	Bonneville Power Administration	1,3,5,6	Affirmative	<p>Although we are in support of this standard, it needs more clarification, in particular Requirement #2 and Measure #2. Obviously, the System Operator Training Program for System Operator's entering training after the effective date of PER-005 will meet this requirement.</p> <p>How does the RC, BA, and TOP meet this standard for each System Operator deemed fully qualified previous to this standard?</p> <p>What is the basis? I.E. NERC Certification? Previous Training Program?, Management Approval?</p> <p>Does every System Dispatcher have to re-enter training?</p> <p>Tests? How do the RC'S, BA'S, and TOP'S determine if the method utilized to verify capability of performing the RC, BA, or TOP tasks meet NERC'S intent of this standard.</p>
<p>Response: The responsible entity must verify that each of its System Operators is capable of performing each company-specific reliability-related task. The standard provides several ways of documenting this verification – and each entity must determine how to accomplish this verification. If additional training is required to meet the verification requirement, then the responsible entity is expected to provide that training. As envisioned, many entities will already have some or most of the documentation needed to demonstrate compliance with Requirement R2. The Measure for M2 provides several examples of acceptable evidence: “This evidence can be documents such as training records showing successful completion of tasks with the employee name and date; supervisor check sheets showing the employee name, date, and task completed; or the results of learning assessments.”</p>				
Douglas E. Hils	Duke Energy Carolina	1	Affirmative	<p>As currently written, requirement R3.1 says that unless you have an established IROL, or have established operating guides or protection systems to mitigate IROL violations, you do not need to comply with the requirement to train System Operators using simulation technology. However, paragraph 1393 of Order 693 states that simulators should be used by reliability coordinators, transmission operators and balancing authorities that have operational control over a significant portion of load and generation. We believe that there are large entities who do not have established IROL's within their systems, or established operating guides or protection systems to mitigate IROL violations. Therefore a reliability disconnect exists between R3.1 and paragraph 1393. Requirement R3.1 should be modified to resolve this disconnect.</p>

Voter	Entity	Segment	Vote	Comment
<p>Response: The SPT SDT is responding to directives included in FERC Order 693. Order 693 does include a directive to require the use of simulators by reliability coordinators, transmission operators and balancing authorities that have operational control over a significant portion of load and generation. The SDT believes that the language in Requirement R3.1 provides an alternative approach that meets the intent of the directive - using simulation technology such as a simulator, virtual technology or other technology that replicates the operational behavior of the BES during normal and emergency conditions. As envisioned, the intent of the directive was not aimed so much at an entity's size, but at the level of importance (from a reliability perspective) of the operational control – and by using IROLs as a delineating criterion, the SDT believes it has properly focused R3.1 on those entities that have the greatest impact on reliability of the BES.</p>				
Robert Martinko	FirstEnergy Energy Delivery	1	Affirmative	<p>FirstEnergy appreciates the work of the System Personnel Training standard drafting team and is voting AFFIRMATIVE to the proposed new PER-005-1 standard as well as the conforming changes to the PER-004-2 and retirement of PER-002-0. However, we would appreciate a response from the drafting regarding two questions related to PER-005-1.</p> <p>Requirement R2 states the following: R2: Each Reliability Coordinator, Balancing Authority and Transmission Operator shall verify each of its System Operator's capabilities to perform each assigned task identified in R1.1 at least one time. [Violation Risk Factor: High] [Time Horizon: Long-term Planning]</p> <p>R2.1: Within six months of a modification of the BES company-specific reliability-related tasks, each Reliability Coordinator, Balancing Authority and Transmission Operator shall verify each of its System Operator's capabilities to perform the new or modified tasks.</p> <p>QUESTION 1: Based on reading the Implementation Plan, it is understood that we will have roughly 24 months beyond regulatory approval to finalize our list of reliability related tasks as required by R1.1 and complete the initial "one time" assessment of those reliability related tasks for each of our operators. It is assumed that the six month requirement as stated R2.1 only applies after this initial 24 month period and that any adjustments to our list of reliability related tasks within the first 24 month period would not trigger requirement R2.1.</p> <p>Requirement R3 states the following: R3: At least every 12 months each Reliability Coordinator, Balancing Authority and Transmission Operator shall provide each of its System Operators with at least 32</p>

Voter	Entity	Segment	Vote	Comment
				<p>hours of emergency operations training applicable to its organization that reflects emergency operations topics, which includes system restoration using drills, exercises or other training required to maintain qualified personnel.</p> <p>QUESTION 2: It is FirstEnergy interpretation that the intent is to complete 32 hours of emergency training on an annual (calendar year) basis and that an entity is not expected to continuously be able to show 32 hours of emergency compliance training on a rolling twelve month basis. It is our opinion that completing on an annual basis is consistent with other continuing education programs and provides greater flexibility in scheduling and completing the needed training. The present wording is open for interpretation and entities are exposed to differing views from compliance auditing staff. If FE's interpretation is correct, we suggest that the drafting team change the wording as follows: "On an annual, calendar year basis, each Reliability Coordinator ..."</p>
<p>Response: If an entity determines a new or modifies an existing reliability-related task, the entity would always have 6 months from the date of identifying a new or modifying an existing reliability-related task to be compliant with Sub-requirement R2.1.</p>				
<p>The SPT SDT did not intend to define the 12 month period for providing emergency operations training. The SPT SDT believes that this period should be defined by the individual entity on a case-by-case basis. The SPT SDT revised the condition for Requirement 3 from "annually" to "every 12 months" to allow for the situation of new hires late in the calendar year.</p>				
<p>Joanne Kathleen Borrell (3)</p> <p>Kenneth Dresner (5)</p> <p>Mark S Travaglianti (6)</p>	<p>FirstEnergy Solutions</p>	<p>3,5,6</p>	<p>Affirmative</p>	<p>FirstEnergy appreciates the work of the System Personnel Training standard drafting team and is voting AFFIRMATIVE to the proposed new PER-005-1 standard as well as the conforming changes to the PER-004-2 and retirement of PER-002-0. However, we would appreciate a response from the drafting regarding two questions related to PER-005-1.</p> <p>Requirement R2 states the following: R2: Each Reliability Coordinator, Balancing Authority and Transmission Operator shall verify each of its System Operator's capabilities to perform each assigned task identified in R1.1 at least one time. [Violation Risk Factor: High] [Time Horizon: Long-term Planning]</p> <p>R2.1: Within six months of a modification of the BES company-specific reliability-related tasks, each Reliability Coordinator, Balancing</p>

Voter	Entity	Segment	Vote	Comment
				<p>Authority and Transmission Operator shall verify each of its System Operator’s capabilities to perform the new or modified tasks.</p> <p>QUESTION 1: Based on reading the Implementation Plan, it is understood that we will have roughly 24 months beyond regulatory approval to finalize our list of reliability related tasks as required by R1.1 and complete the initial "one time" assessment of those reliability related tasks for each of our operators. It is assumed that the six month requirement as stated R2.1 only applies after this initial 24 month period and that any adjustments to our list of reliability related tasks within the first 24 month period would not trigger requirement R2.1.</p> <p>Requirement R3 states the following: R3: At least every 12 months each Reliability Coordinator, Balancing Authority and Transmission Operator shall provide each of its System Operators with at least 32 hours of emergency operations training applicable to its organization that reflects emergency operations topics, which includes system restoration using drills, exercises or other training required to maintain qualified personnel.</p> <p>QUESTION 2: It is FirstEnergy interpretation that the intent is to complete 32 hours of emergency training on an annual (calendar year) basis and that an entity is not expected to continuously be able to show 32 hours of emergency compliance training on a rolling twelve month basis. It is our opinion that completing on an annual basis is consistent with other continuing education programs and provides greater flexibility in scheduling and completing the needed training. The present wording is open for interpretation and entities are exposed to differing views from compliance auditing staff. If FE's interpretation is correct, we suggest that the drafting team change the wording as follows: "On an annual, calendar year basis, each Reliability Coordinator ..."</p>
<p>Response: If an entity determines a new or modifies an existing reliability-related task, the entity would always have 6 months from the date of identifying a new or modifying an existing reliability-related task to be compliant with Sub-requirement R2.1.</p> <p>The SPT SDT did not intend to define the 12 month period for providing emergency operations training. The SPT SDT believes that this period should be defined by the individual entity on a case-by-case basis. The SPT SDT revised the condition for Requirement 3 from “annually” to “every 12 months” to allow for the situation of new hires late in the calendar year.</p>				

Voter	Entity	Segment	Vote	Comment
Douglas Hohlbaugh	Ohio Edison Company	4	Affirmative	<p>FirstEnergy appreciates the work of the System Personnel Training standard drafting team and is voting AFFIRMATIVE to the proposed PER-005-1 standard. However, we would appreciate a Response from the drafting related to questions related to requirements R2 and R3.</p> <p>Requirement R2 states the following: R2: Each Reliability Coordinator, Balancing Authority and Transmission Operator shall verify each of its System Operator’s capabilities to perform each assigned task identified in R1.1 at least one time. [Violation Risk Factor: High] [Time Horizon: Long-term Planning]</p> <p>R2.1: Within six months of a modification of the BES company-specific reliability-related tasks, each Reliability Coordinator, Balancing Authority and Transmission Operator shall verify each of its System Operator’s capabilities to perform the new or modified tasks.</p> <p>QUESTION 1: Based on reading the Implementation Plan, it is understood that we will have roughly 24 months beyond regulatory approval to finalize our list of reliability related tasks as required by R1.1 and complete the initial "one time" assessment of those reliability related tasks for each of our operators. It is assumed that the six month requirement as stated R2.1 only applies after this initial 24 month period and that any adjustments to our list of reliability related tasks within the first 24 month period would not trigger requirement R2.1.</p> <p>Requirement R3 states the following: R3: At least every 12 months each Reliability Coordinator, Balancing Authority and Transmission Operator shall provide each of its System Operators with at least 32 hours of emergency operations training applicable to its organization that reflects emergency operations topics, which includes system restoration using drills, exercises or other training required to maintain qualified personnel.</p> <p>QUESTION 2: It is FirstEnergy interpretation that the intent is to complete 32 hours of emergency training on an annual (calendar year) basis and that an entity is not expected to continuously be able to show 32 hours of emergency compliance training on a rolling twelve month basis. It is our opinion that completing on an annual basis is</p>

Voter	Entity	Segment	Vote	Comment
				consistent with other continuing education programs and provides greater flexibility in scheduling and completing the needed training. The present wording is open for interpretation and entities are exposed to differing views from compliance auditing staff. If FE's interpretation is correct, we suggest that the drafting team change the wording as follows: "On an annual, calendar year basis, each Reliability Coordinator ..."
<p>Response: If an entity determines a new or modifies an existing reliability-related task, the entity would always have 6 months from the date of identifying a new or modifying an existing reliability-related task to be compliant with Sub-requirement R2.1.</p> <p>The SPT SDT did not intend to define the 12 month period for providing emergency operations training. The SPT SDT believes that this period should be defined by the individual entity on a case-by-case basis. The SPT SDT revised the condition for Requirement 3 from "annually" to "every 12 months" to allow for the situation of new hires late in the calendar year.</p>				
Ajay Garg (1) Michael D Penstone (3)	Hydro One Networks, Inc.	1,3	Affirmative	Although we agree with the standard, thus the affirmative vote, there is a fundamental issue related with effective dates, that is, the dates in which Reliability Standards become effective and enforceable. In principle, the effective date of standards must be the same for all jurisdictions in North America. It does not make sense that there is a period of time when a standard is effective only in some jurisdictions while not in others. The words inserted in the Effective Date of the Standard as well as in the Implementation Plan document permit that the Standard becomes effective in some jurisdictions before it does in others. The Standard should be modified to ensure that it becomes effective in all jurisdictions at the same time, including those where such regulatory approval is not required that is, only when all regulatory approvals have been obtained.
<p>Response: This is outside the scope of this SDT and we suggest discussing the inconsistent timing of implementation of standards in North America with the appropriate regulating agency.</p>				

Voter	Entity	Segment	Vote	Comment
Terry Bilke	Midwest ISO, Inc.	2	Affirmative	<p>We appreciate the work that has gone into the development of the training standard. It has come a long way to being something that the industry can achieve and contributes to reliability. We believe it's inappropriate to assign High VRFs to training requirements. While training is very important, failure to have documentation that an operator has been trained on a task does not put the interconnection at risk of cascading. This drains resources from important jobs and may actually decrease the quality and scope of training. It is quite likely that entities will be very cautious on what they put on their JTA as each added task carries a significant compliance administration burden and inflated sanctions exposure. We believe heavy handed VRFs and VSLs are a primary reason the due process pipeline is moving slowly. Not only has it taken Regions a long time to come up with the settlements, they are now required to provide additional documentation of why a lesser sanction is appropriate when the assigned VRF and VSLs come up with a penalty that doesn't reasonably fit the situation. Again, VRFs are supposed to measure the risk caused by violating the standard. Risk includes impact and probability. VRFs are not and should not be a measure of importance. There are many things we do as an industry that are important, but failing to do these important things once does not put the interconnection at risk of cascading.</p> <p>Finally, R1: "BES company-specific reliability-related tasks" appears to exclude potential BES fundamentals-related training and courses that are relevant to BES behavior and performance, yet not company specific.</p>
<p>Response: The SPT SDT believes, based on the existing definitions of the VRFs, the VRFs should not be changed. The analysis of the August 2003 Blackout showed that training, or the lack of training, was a significant factor that contributed to the blackout. The VRF Definitions can be found in the NERC Drafting Team Guidelines at (ftp://www.nerc.com/pub/sys/all_updl/standards/dt/Drafting_Team_Guidelines_01Jul07.pdf) as well as in the Reliability Standards Development Procedure Manual.</p> <p>The SPT SDT is not trying to define all types of training to conduct, but is instead allowing the individual Reliability Coordinator, Balancing Authority or Transmission Operator to determine what type of BES fundamentals training is needed to operate their particular system.</p>				

Voter	Entity	Segment	Vote	Comment
Wayne Lewis	Progress Energy Carolinas	5	Affirmative	<p>Although Progress Energy is voting Affirmative on PEF-005-1, we submit the following comments and request informal clarification on two of the requirements:</p> <p>Clarification on R1.1: What does NERC mean by "BES company-specific reliability-related task list? By using the word reliability, is NERC excluding Generation/AGC/Interchange type tasks? Is NERC only focusing on transmission related tasks?</p> <p>Clarification on R2: "shall verify each of its System Operator's capabilities to perform each assigned task identified in R1.1 at least one time." Are existing NERC certified System Operators grandfathered?</p>
<p>Response: The Reference Document associated with the standard details some topics that could be used in development of a company-specific reliability-related task list. The topics identified in the reference document include generation, interchange and AGC functions.</p> <p>The responsible entity must verify that each of its System Operators is capable of performing each company-specific reliability-related task. There is no grandfathering.</p>				
Richard Salgo	Sierra Pacific Power Co.	1	Affirmative	Nice job by the Standards Drafting Team. This one has been through numerous drafts, and this version hits the mark.
<p>Response: The SDT thanks you for your affirmative response.</p>				
Alan Gale	City of Tallahassee	5	Affirmative	While there are some items I take issue with, this standard is a good compromise and I thank the SDT for there perseverance.
<p>Response: The SDT thanks you for your affirmative response.</p>				