

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

The Certifying System Operators Standard Drafting Team thanks all commenters who submitted comments on the draft Operating Personnel Credentials standard. This standard was posted for a 30-day public comment period from October 21, 2009 through November 20, 2009. The stakeholders were asked to provide feedback on the standards through a special Electronic Comment Form. There were 41 sets of comments, including comments from more than 150 different people from over 65 companies representing 9 of the 10 Industry Segments as shown in the table on the following pages.

http://www.nerc.com/filez/standards/Certifying_SOs_Project_2007-04.html

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Vice President and Director of Standards, Gerry Adamski, at 609-452-8060 or at gerry.adamski@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

¹ The appeals process is in the Reliability Standards Development Procedures:
<http://www.nerc.com/standards/newstandardsprocess.html>.

Index to Questions, Comments, and Responses

1. The Purpose statement of the draft standard reads “To ensure that System Operators performing the reliability-related tasks’ of the Reliability Coordinator, Balancing Authority or Transmission Operator have demonstrated competency through the Certification Process when filling a real-time operating position responsible for the control of the Bulk Electric System”	11
2. In The effective date of the draft standard reads “In those jurisdictions where regulatory approval is required, this standard shall become effective the first calendar day of the first calendar quarter six 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 six months after Board of Trustees adoption”	20
3. Requirement R1 of the draft standard reads:	24
4. Requirement R2 of the draft standard reads:	37
5. Requirement R3 of the draft standard reads:	50
6. Do you agree with the Measure for the requirements in the standard? If not, please explain in the comment area.	63
7. Do you agree with the Violation Risk Factors for each of the requirements in the standard? If not, please explain in the comment area.	71
8. Do you agree with the Violation Severity Levels for each of the requirements in the standard? If not, please explain in the comment area.	77
9. Do you agree with the proposed Implementation Plan for this standard? If not, please explain in the comment area.	82
10. In In FERC Order 693 the Commission directed the ERO to consider “grandfathering” of system operators. The SDT has strongly considered grandfathering and does not feel that it should be allowed within this standard. The major factors that the SDT based its decision to not allow for grandfathering are as follows:.....	86
11. In FERC Order 693 the Commission directed the ERO to include the minimum competencies that must be demonstrated to become and remain a certified system operator. The SDT has identified topical areas for which minimum competency must be validated through the certification process.	91
12. If you are aware of any conflicts between the proposed standard and any regulatory function, rule order, tariff, rate schedule, legislative requirement, or agreement please identify the conflict in the comments section.	100
13. In Please provide any other comments (that you have not already provided in response to the questions above) that you have on the draft standard PER-003-1.....	104

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

The Industry Segments are:

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

		Commenter	Organization	Industry Segment									
				1	2	3	4	5	6	7	8	9	10
1.	Group	Margaret Stambach	SERC Standards Review Group	X	X	X		X	X			X	X
Additional Member		Additional Organization		Region			Segment Selection						
1.	Steve Fritz	ACES Power Marketing		SERC			6						
2.	John Neagle	AECI		SERC			1, 3, 5						
3.	Greg Yackle	City of Springfield IL-CWLP		SERC			1, 3, 5, 9						
4.	David Jenkins	Dominion VP		SERC			3, 1						
5.	Jack Kerr	Dominion VP		SERC			1, 3						
6.	Devan Hoke	Duke Energy		SERC			1, 3, 5						
7.	Steve Jones	Duke Energy		SERC			1, 3, 5						
8.	Andy Burch	EEI		SERC			1, 5						
9.	Rick Myers	EEI		SERC			1, 5						
10.	Jim Case	Entergy Transmission		SERC			1, 3						
11.	Robert Wayne Mitchell	Entergy Transmission		SERC			1, 3						
12.	Brad Young	EON-US		SERC			1, 3, 5						
13.	Brian Haggard	GSOC		SERC			3						

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

	Commenter	Organization	Industry Segment												
			1	2	3	4	5	6	7	8	9	10			
14.	Paul Hodges	GSOC	SERC							3					
15.	Timmy Lejeune	LAGen/NRG Energy	SERC							1, 3, 5					
16.	Dwayne Robert	OMU	SERC							1, 3, 5					
17.	Ray Gross	PJM	SERC							2					
18.	Bill Thigpen	PowerSouth	SERC							1, 3, 5, 9					
19.	Kevin Kelly	Progress Energy	SERC							1, 3, 5					
20.	Rene Free	Santee Cooper	SERC							1, 3, 5, 9					
21.	Glenn Stephens	Santee Cooper	SERC							1, 3, 5, 9					
22.	Gene Delk	SCE&G	SERC							1, 3, 5					
23.	Steve Hebert	SCE&G	SERC							1, 3, 5					
24.	John Troha	SERC Reliability Corp.	SERC							10					
25.	Gwen Frazier	Southern Company	SERC							1, 3, 5					
26.	Robert (Rocky) Williamson	Southern Company	SERC							1,3,5					
27.	Alvis Lanton	Southern Illinois Power	SERC							1,3,5					
28.	John Rembold	Southern Illinois Power	SERC							1,3,5					
29.	Doug Bailey	TVA	SERC							1,3,5,9					
30.	Mike Fielden	TVA	SERC							1,3,5,9					
31.	Edd Forsythe	TVA	SERC							1,3,5,9					
32.	John Kell	TVA	SERC							1,3,5,9					
33.	Sue Mangum	TVA	SERC							1,3,5,9					
34.	Annette Moore	TVA	SERC							1,3,5,9					
35.	David Troy	TVA	SERC							1,3,5,9					
2.	Group	Carol Gerou	NERC Standards Review Subcommittee												X
	Additional Member	Additional Organization	Region	Segment Selection											
1.	Chuck Lawrence	American Transmission Company	MRO												1
2.	Tom Webb	WPS Corporation	MRO												4, 5, 6
3.	Terry Bilke	Midwest ISO Inc.	MRO												2

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

	Commenter	Organization	Industry Segment												
			1	2	3	4	5	6	7	8	9	10			
4.	Jodi Jenson	Western Area Power Administration	MRO							1, 6					
5.	Ken Goldsmith	Alliant Energy	MRO							4					
6.	Dave Rudolph	Basin Electric Power Cooperative	MRO							1, 3, 5, 6					
7.	Eric Ruskamp	Lincoln Electric System	MRO							1, 3, 5, 6					
8.	Joseph Knight	Great River Energy	MRO							1, 3, 5, 6					
9.	Joe DePoorter	Madison Gas & Electric	MRO							3, 4, 5, 6					
10.	Scott Nickels	Rochester Public Utilities	MRO							4					
11.	Terry Harbour	MidAmerican Energy Company	MRO							1, 3, 5, 6					
3.	Group	Guy Zito	Northeast Power Coordinating Council												X
Additional Member		Additional Organization		Region			Segment Selection								
1.	Alan Adamson	New York State Reliability Council, LLC		NPCC			10								
2.	Gregory Campoli	New York Independent System Operator		NPCC			2								
3.	Roger Champagne	Hydro-Quebec TransEnergie		NPCC			2								
4.	Kurtis Chong	Independent Electricity System Operator		NPCC			2								
5.	Sylvain Clermont	Hydro-Quebec TransEnergie		NPCC			1								
6.	Chris de Graffenried	Consolidated Edison Co. of New York, Inc.		NPCC			1								
7.	Brian D. Evans-Mongeon	Utility Services		NPCC			8								
8.	Peter Yost	Consolidated Edison Co. of New York, Inc.		NPCC			3								
9.	Brian L. Gooder	Ontario Power Generation Incorporated		NPCC			5								
10.	Kathleen Goodman	ISO - New England		NPCC			2								
11.	David Kiguel	Hydro One Networks Inc.		NPCC			1								
12.	Michael R. Lombardi	Notheast Utilities		NPCC			1								
13.	Randy MacDonald	New Brunswick System Operator		NPCC			2								
14.	Greg Mason	Dynergy Generation		NPCC			5								
15.	Bruce Metruck	New York Power Authority		NPCC			6								
16.	Chris Orzel	FPL Energy/NextEra Energy		NPCC			5								
17.	Robert Pellegrini	The United Illuminating Company		NPCC			1								

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

	Commenter	Organization	Industry Segment											
			1	2	3	4	5	6	7	8	9	10		
18.	Saurabh Saksena	National Grid	NPCC			1								
19.	Michael Schiavone	National Grid	NPCC			1								
20.	Lee Pedowicz	Northeast Power Coordinating Council	NPCC			10								
21.	Gerry Dunbar	Northeast Power Coordinating Council	NPCC			10								
4.	Group	Deb Schaneman	Platte River Power Authority Operations Group	X		X		X						
Additional Member			Additional Organization			Region			Segment Selection					
1.	Terry Baker	Platte River Power Authority	WECC			1, 3, 5								
2.	John Powell	Platte River Power Authority	WECC			1, 3, 5								
3.	Jeff Landis	Platte River Power Authority	WECC			1, 3, 5								
5.	Group	Denise Koehn	Bonneville Power Administration	X		X		X	X					
Additional Member			Additional Organization			Region			Segment Selection					
1.	Bernie O'Connell	Transmission Dispatch	WECC			1								
2.	Ted Snodgrass	Transmission Dispatch	WECC			1								
3.	Tim Loepker	Transmission Dispatch	WECC			1								
6.	Group	Lauri Jones	WECC Operations Training Subcommittee											
Additional Member			Additional Organization			Region			Segment Selection					
1.	Robert Eubank	WECC	WECC			10								
2.	Steve Owen	PSC	WECC											
3.	Brian Reich	IPCO	WECC											
4.	Richard Krajewski	PNM	WECC											
5.	Keith Carmen	TSGT	WECC											
6.	Hank LuBean	DOPD	WECC											
7.	Kristie Coco	SRP	WECC											
8.	Rich Brock	PSC	WECC											

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

	Commenter	Organization	Industry Segment											
			1	2	3	4	5	6	7	8	9	10		
9.	Warren Maxvill	AVA	WECC											
10.	Bruce Fauvelle	AESO	WECC											
11.	Pete Gibson	WECC-RC	WECC											
12.	Brett Hallborg	BCTC	WECC											
13.	Stephanie Conn	WAPA	WECC											
14.	Bill Simmons	SMUD	WECC											
15.	Robert Staten	PSC	WECC											
16.	Robert Williams	Pacific Corp	WECC											
7.	Group	Kenneth D. Brown	Public Service Enterprise Group Inc. Companies	X		X								
Additional Member			Additional Organization			Region			Segment Selection					
1.	Ron Wharton	PSE&G	RFC									1, 3		
2.	Jim Hebson	ER&T	RFC									6		
3.	Tom Piascik	PSEG Fossil	RFC									5		
8.	Group	Sam Ciccone	FirstEnergy	X		X	X	X	X					
Additional Member			Additional Organization			Region			Segment Selection					
1.	Jim Eckels	FirstEnergy	RFC											
2.	John Wilson	FirstEnergy	RFC											
3.	John Martinez	FirstEnergy	RFC											
4.	Steve Megay	FirstEnergy	RFC											
5.	Andy Hunter	FirstEnergy	RFC											
6.	Dave Folk	FirstEnergy	RFC											
9.	Group	Jason L. Marshall	Midwest ISO Stakeholder Standards Collaborators		X									
Additional Member			Additional Organization			Region			Segment Selection					
1.	Michael J Ayotte	ITC Holdings	RFC									1		

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

	Commenter	Organization	Industry Segment												
			1	2	3	4	5	6	7	8	9	10			
2.	Barb Kedrowski	We Energies	RFC			3, 4, 5									
3.	Joe Knight	Great River Energy	MRO			1, 3, 5									
4.	Alisha Anker	Prairie Power, Inc.	SERC			3, 4									
5.	Jim Cyrulewski	JDRJC Associates, LLC	RFC			8									
10.	Group	Ben Li	ISO RTO Council Standards Review Committee				X								
Additional Member		Additional Organization		Region			Segment Selection								
1.	Mark Thompson	AESO	WECC			2									
2.	Lourdes Estrada-Saliner	CAISO	WECC			2									
3.	Steve Myers	ERCOT	ERCOT			2									
4.	Matt Goldberg	ISONE	NPCC			2									
5.	Bill Phillips	MISO	MRO			2									
6.	Jim Castle	NYISO	NPCC			2									
7.	Patrick Brown	PJM	RFC			2									
8.	Charles Yeung	SPP	SPP			2									
11.	Group	JT Wood	Southern Company Transmission			X		X							
Additional Member		Additional Organization		Region			Segment Selection								
1.	Hugh Frances		SERC			1									
12.	Group	Richard J. Kafka	Pepco Holdings, Inc - Affiliates			X									
Additional Member		Additional Organization		Region			Segment Selection								
1.	David Thorne	Potomac Electric Power Company	RFC			1									
2.	Valerie Hildebrand	Potomac Electric Power Company	RFC			1									
3.	Vic Davis	Delmarva Power & Light	RFC			1									
4.	John Keller	Atlantic City Electric	RFC			1									
13.	Individual	Ted Bialy	Brookfield Renewable Power Inc			X				X					

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

		Commenter	Organization	Industry Segment										
				1	2	3	4	5	6	7	8	9	10	
14.	Individual	Sandra Shaffer	PacifiCorp	X		X		X	X					
15.	Individual	Kelly Blackmer	NERC PCGC											X
16.	Individual	Brent Ingebrigtsen	E.ON U.S. LLC	X		X		X	X					
17.	Individual	Mark L Bennett	Gainesville Regional Utilities	X		X		X					X	
18.	Individual	Joylyn Stover	Consumers Energy Company			X	X	X						
19.	Individual	Mark Thompson	Alberta Electric System Operator		X									
20.	Individual	Kasia Mihalchuk	Manitoba Hydro	X		X		X	X					
21.	Individual	Alice Murdock	Xcel Energy	X		X		X	X					
22.	Individual	Lauri Jones	Pacific Gas and Electric Company	X		X		X						
23.	Individual	Brian Reich	IPCo			X	X							
24.	Individual	Gordon Rawlings	BCTC	X	X									
25.	Individual	Joe O'Brien	NIPSCO	X		X		X	X					
26.	Individual	Alan Gale	City of Tallahassee (TAL)			X		X						
27.	Individual	Kathleen Goodman	ISO New England Inc.		X									
28.	Individual	Jonathan Appelbaum	Long Island Power Authority	X										
29.	Individual	Ron Gunderson	Nebraska Public Power District	X		X		X						

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

		Commenter	Organization	Industry Segment										
				1	2	3	4	5	6	7	8	9	10	
30.	Individual	Edward Davis	Entergy Services	X		X		X	X					
31.	Individual	James H. Sorrels, Jr.	American Electric Power (AEP)	X		X		X	X					
32.	Individual	Dan Rochester	Independent Electricity System Operator		X									
33.	Individual	James Starling	South Carolina Electric and Gas	X		X		X	X					
34.	Individual	Laura Zotter	ERCOT ISO		X									
35.	Individual	Greg Rowland	Duke Energy	X		X		X	X					
36.	Individual	Scott Barfield-McGinnis	Georgia System Operations Corporation			X	X							
37.	Individual	Annette L. Moore	Transmission and Reliability (TRO), TVA										X	
38.	Individual	Roger Champagne	Hydro-Québec TransEnergie (HQT)	X										
39.	Individual	Jason Shaver	American Transmission Company	X										
40.	Individual	Martin Bauer	US Bureau of Reclamation					X						

1. The Purpose statement of the draft standard reads “To ensure that System Operators performing the reliability-related tasks’ of the Reliability Coordinator, Balancing Authority or Transmission Operator have demonstrated competency through the Certification Process when filling a real-time operating position responsible for the control of the Bulk Electric System”.

Do you agree with the Purpose as written for this standard? If not, please explain in the comment area.

Summary Consideration:

Organization	Yes or No	Question 1 Comment
E.ON U.S. LLC		
Manitoba Hydro	No	: The measures do not match the purpose and requirements. In both the purpose statement and requirements “competency” is mentioned, yet there is no measures in place for this. NERC certification alone does not guarantee competency. Our definition for competency is it encompasses a combination of knowledge, skills, and behavior to perform a specific role. Yes there does not appear to be any linkage to the measures for skills and behaviors. This leaves it open for interpretation by auditors in the future and will end up being a potential hindrance to improving the competence of System Operating personnel across the industry.
Response:		
American Transmission Company	No	ATC is concerned that the proposed “Purpose” statement does not align with the requirements and measures as proposed. ATC believes that this standard should focus on requiring System Operators (Associated with RC, TOP and BA) to be NERC certified and should not directly address the competency issue. We are making this statement because we believe that the minimum competency issue is adequately covered in the NERC System Operator Certification program and therefore its inclusion in this standard is both duplicative and confusing. Does the SDT have any members from the NERC System Operation Certificate program or has the team reached out to that group while writing this standard? NERC’s System Operation Certificate program includes a test which is developed by industry experts and overseen by NERC with a focus on specific competencies based on NERC Reliability Standards. Since those competencies are already documented and covered in the Certificate program it is duplicative to include them within this standard. Suggested Modification: (Purpose Statement) “To ensure System Operators are NERC Certified.” We suggest

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 1 Comment
		deleting the phrase “performing the reliability-related tasks of the RC, BA and TOP” because the definition of System Operator is descriptive enough to cover this issue. In addition, the Applicability section already identifies which entities have to comply so we did not find it necessary to repeat them in the Purpose statement. Could the SDT identify the deficiencies with the definition of System Operator which cases them to include the additional descriptive language?
Response:		
Long Island Power Authority	No	Certification process is in capitals even though it is not a defined term in the NERC Glossary. The term should either be defined or changed to lower case.
Response:		
IPCo	No	demonstration of competencies should not be part of of this standard.
Response:		
ERCOT ISO	No	ERCOT ISO recommends the following change in wording:”To ensure that System Operators performing the functions of the Reliability Coordinator, Balancing Authority or Transmission Operator have obtained and maintain the associated valid NERC certificate.”
Response:		
Consumers Energy Company	No	In order for this to make sense, I would replace the word “when” with “prior to.”
Response:		
NIPSCO	No	Passing a NERC Operating Certification exam does not ensure competency in all listed areas since one could perform poorly in one area of the exam and still obtain a credential. At the very least the word “competency” should be replaced by “minimum competency” here.
Response:		
Transmission and Reliability	No	Recommend the statement be demonstrated minimum competency through the certification process. Certification is a minimum competency and does not fully demonstrate an operator’s ability and competency

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 1 Comment
(TRO), TVA		pertaining to real-time operations of the BES.
Response:		
ISO RTO Council Standards Review Committee	No	The competencies should be addressed in the development of the certification exam and NOT in this standard. This standard should simply require the operators to obtain the requisite certification. We are concerned that the stated purpose to demonstrate “competency through the Certification Process” is not fulfilled by the proposed requirements. Demonstration of competency cannot be based solely on the NERC Operator Certification Process. The successful completion of 200 continuing education hours over a three year period does not measure two other important factors tied to competency; possessing adequate skills, and exhibiting appropriate behaviors. Demonstration of competency is mandated through PER-005-1. To be more complete and accurate, and possibly avoid future Requests for Interpretation, we suggest “for the control of the Bulk...” be changed to “for the real-time operation of the Bulk...” AESO has also submitted its individual comments that are not a part of these joint comments. Please note their additional comments to PER-003-1.
Response:		
Platte River Power Authority Operations Group	No	The NERC Glossary of Terms for System Operator includes Generator Operator which this standard is not applicable to. It should read: To ensure that Reliability Coordinator, Transmission Operator and Balancing Authority system operators...Certification Process is capitalized indicating it is a defined term in the NERC Glossary of Terms which it is not. The standard drafting team (SDT) should either define the term or change it to say ...through the NERC system operator certification program.
Response:		
Midwest ISO Stakeholder Standards Collaborators	No	The purpose of this standard as written is OK but could be made simpler. A more simple and clearer purpose is: “To ensure that System Operators performing the reliability-related tasks of the Reliability Coordinator, Balancing Authority and Transmission Operator are certified”.
Response:		
Alberta Electric System Operator	No	The purpose statement should be modified to ensure desks performing reliability related tasks are staffed with System Operators who hold a valid NERC Certification credential. It should not discuss anywhere in the standard anything regarding minimum competencies as this is determined by NERC PCGC.

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 1 Comment
BCTC	No	The purpose statement should be modified to ensure desks performing reliability related tasks are staffed with System Operators who hold a valid NERC Certification credential. It should not discuss anywhere in the standard anything regarding minimum competencies as this is determined by NERC PCGC.
Pacific Gas and Electric Company	No	The purpose statement should be modified to ensure desks performing reliability related tasks are staffed with System Operators who hold a valid NERC Certification credential. It should not discuss anywhere in the standard anything regarding minimum competencies as this is determined by NERC PCGC.
WECC Operations Training Subcommittee	No	The purpose statement should be modified to ensure desks performing reliability related tasks are staffed with System Operators who hold a valid NERC Certification credential. It should not discuss anywhere in the standard anything regarding minimum competencies as this is determined by NERC PCGC.
Response:		
US Bureau of Reclamation	No	The requirement is to obtain the certification. The purpose is to have demonstrated minimum competency in the specific areas defined in the standard.
Response:		
Xcel Energy	No	The standard relates to operating personnel credentials. "Competencies" are addressed in the training standard as well as whatever the governing document is for the operator certification minimum criteria, not this standard. Suggested purpose: To ensure that System Operators performing the BES reliability related real time operating tasks of a Reliability Operator, Balancing Authority, or Transmission Operator possess the required level of NERC Certification.
Response:		
Georgia System Operations Corporation	No	The term real-time operating position needs to be defined. The term system operators in the NERC glossary refer to generation operators and this standard does not. Should the glossary be changed to remove generator operators?
Response:		
Independent Electricity System	No	The use of the terms "demonstrated competency" in this context is perhaps misleading and inappropriate. It

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 1 Comment
Operator		<p>is generally accepted in the industry that a person who is deemed to be competent, or has obtained competency or is able to demonstrate competency in performing a job consisting of a number of tasks encompasses a combination of knowledge, skills and behavior. It is possible for any person to write and pass a NERC certification exam without ever having performed a reliability related task. The purpose of this standard is to ensure that operators performing reliability related tasks are appropriately certified. Competency in performing reliability related tasks is ensured through operator training which is addressed in Standard PER-005-01. The SDT commentary in Question #10 of this comment form seems to acknowledge the fact that obtaining NERC Certification only ensures that System Operators with responsibility for real-time operations have a minimum level of knowledge that assists in their achieving reliable operations and that passing a certification examination is NERC's only available method to verify the minimum knowledge level of a System Operator. Suggested alternative wording for the "Purpose" statement: "To ensure that System Operators performing the reliability-related tasks' of the Reliability Coordinator, Balancing Authority or Transmission Operator have obtained and maintain certification through the NERC Certification Process".</p>
Response:		
Hydro-Québec TransEnergie (HQT)	No	<p>There is concern over the use of "control of the Bulk Electric System". Revision of the standard used "real-time operation of the Bulk Electric System". What is the definition of "control of the Bulk Electric System"? Clarify "control". "Control" implies overall authority, and that could be misinterpreted as to what entity has overall authority, the RC or TO. It might be necessary for the RC to define "control" for the RC's region. To be more complete and accurate, suggest "for the control of the Bulk..." be changed to "for the real-time operation of the Bulk..." Reliability-related tasks should be defined. More specificity is needed to answer the question as to whether or not real-time operations support engineers (planning, etc.) need to be certified. It is our opinion that they don't need to be certified. What is the opinion of the SDT?</p>
Response:		
Northeast Power Coordinating Council	No	<p>There is concern over the use of "control of the Bulk Electric System". Revision of the standard used "real-time operation of the Bulk Electric System". What is the definition of "control of the Bulk Electric System"? Clarify "control". "Control" implies overall authority, and that could be misinterpreted as to what entity has overall authority, the RC or TO. It might be necessary for the RC to define "control" for the RC's region. To be more complete and accurate, suggest "for the control of the Bulk..." be changed to "for the real-time operation of the Bulk..." Reliability-related tasks should be defined. More specificity is needed to answer the question as to whether or not real-time operations support engineers (planning, etc.) need to be certified. The wording in the purpose of PER-003-1 does not align with the requirements or the measures outlined in PER-003-1. The purpose of PER-003-1 discusses performing reliability related tasks and demonstrating</p>

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 1 Comment
		<p>competency. The purpose of PER-003-1 is more like the PER-005 requirement to verify each operator's ability to perform reliability related tasks. The purpose of PER-003-1 should be straightforward: ensure each RC, BA, and TOP staffs their real-time operating positions responsible for control of the BES with NERC Certified System Operators. "And maintain competency and proficiency by participating in a training program that meets the requirements the System Personnel Training Reliability Standards" could be added.</p>
Response:		
ISO New England Inc.	No	<p>To be more complete and accurate, and possibly avoid future Requests for Interpretation, we suggest "for the control of the Bulk..." be changed to "for the real-time operation of the Bulk..."</p>
Response:		
Duke Energy	No	<p>We believe the Purpose statement should be reworded to reflect that System Operators demonstrate a minimum level of competency by obtaining and maintaining NERC certification. Suggested rewording:"To ensure that System Operators performing the reliability-related tasks of the Reliability Coordinator, Balancing Authority or Transmission Operator have demonstrated minimum competency by obtaining and maintaining a valid NERC Certificate when filling a real-time operating position responsible for control of the Bulk Electric System."</p>
Response:		
Entergy Services	No	<p>We do not feel that a System Operator has "demonstrated competency" simply by passing the examination to become certified. Indeed, the Standard Drafting Team states under question 10 that "Certification ensures that System Operators with responsibility for real-time operations have a minimum level of knowledge that assists in their achieving reliable operations. In the purpose statement above, the phrase "have demonstrated competency" should be changed to: "have achieved a minimum level of knowledge".In addition, our group would like clarification on some of the terms used in the purpose statement:"real-time operating position". The Glossary of Terms Used in Reliability Standards defines "real time" as "present time as opposed to future time", but real-time operating position is not defined. Does an uncertified trainee sitting at the desk under the direct supervision of a certified operator fill a "real-time operating position"? If so, then the trainee would require certification before being trained in real-time, reliability-related tasks. When exactly does an operator need to be certified? Before ever sitting on the desk? The answer is not clear from the purpose statement as written. "System Operator". System Operator, as defined in the Glossary of Terms Used in Reliability Standards, includes individuals who work in the Generator Operator control centers. Yet</p>

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 1 Comment
		<p>the draft standard Applicability (section A. 4) does not include the Generator Operator as a responsible entity. Since those persons who perform Generator Operator tasks are not required to be certified at this time, the term System Operator should be revised in the Glossary of Terms to exclude individuals who staff the Generator Operator control centers."Certification Process". This term is not defined in the Glossary of Terms and should not be capitalized. Furthermore, the term is confusing as to the exact process to which the draft standard refers. We suggest replacing "Certification Process" with "system operator certification program", a more recognizable term.</p>
Response:		
SERC Standards Review Group	No	<p>We do not feel that a System Operator has "demonstrated competency" simply by passing the examination to become certified. Indeed, the Standard Drafting Team states under question 10A. that "Certification ensures that System Operators with responsibility for real-time operations have a minimum level of knowledge that assists in their achieving reliable operations." In the purpose statement above, the phrase "have demonstrated competency" should be changed to: "have achieved a minimum level of knowledge".In addition, our group would like clarification on some of the terms used in the purpose statement:"real-time operating position". The Glossary of Terms Used in Reliability Standards defines "real time" as "present time as opposed to future time", but real-time operating position is not defined. Does an uncertified trainee sitting at the desk under the direct supervision of a certified operator fill a "real-time operating position"? If so, then the trainee would require certification before being trained in performing real-time, reliability-related tasks. When exactly does an operator need to be certified? Before ever sitting on the desk? The answer is not clear from the purpose statement as written. "System Operator". System Operator, as defined in the Glossary of Terms Used in Reliability Standards, includes individuals who work in the Generator Operator control centers. Yet the draft standard Applicability (section A. 4) does not include the Generator Operator as a responsible entity. Since those persons who perform Generator Operator tasks are not required to be certified at this time, the term System Operator should be revised in the Glossary of Terms to exclude individuals who staff the Generator Operator control centers."Certification Process". This term is not defined in the Glossary of Terms and should not be capitalized. Furthermore, the term is confusing as to the exact process to which the draft standard refers. We suggest replacing "Certification Process" with "system operator certification program", a more recognizable term.</p>
Response:		
American Electric Power (AEP)	No	<p>While AEP fully supports the FERC directive to enhance the certification process to ensure demonstrated competency, AEP believes that this best be addressed in standards PER-002 for qualifications and PER-005 for system training requirements, and in the NERC System Operator Certification Program Manual.PER-003-</p>

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 1 Comment
		<p>0 is correctly focused only on exactly who needs to be certified and what certification is necessary. The specific competencies are best elaborated in the referenced manual and articulated in PER-002 and -005. However, there are a few changes to PER-003-0 that we do recommend, which will be covered in the questions that follow. The high level identification of competencies, consistent with FERC Order 693, does not address the unintended competency training area disconnect involving credential maintenance in the System Operator Certification Program Manual. There is presently no mechanism in the certification credential maintenance process to ensure a specific type of operator is getting the necessary minimum training in the competency areas identified for his/her credential. As long as an operator acquires enough Continuing Education (CE) hours on recognized training topics in Appendix A of the System Operator Certification Program Manual, along with the minimum simulation and standards requirement, he/she can successfully renew a specific credential. For example, there is presently no mechanism or measure to stop a Reliability Coordinator operator from taking all continuing education training in the area of Interchange Scheduling and Coordination, which is more pertinent to a Balancing & Interchange operator. Even if the initial RC exam content outline covers the required competency areas stated, the CE maintenance/renewal process allows a gap to neglect training in the required areas. Therefore, the Program Manual and other PER training Standards will need to address this gap in the future to ensure compliance with FERC order 693. By passing the initial NERC certification test, an operator merely demonstrates minimum knowledge in the specific credential area, as supported by the exam content outline and related questions. The identified competencies and measure of demonstration relevant to the specific credential areas should be addressed in the System Operator Certification Program Manual, and standards PER-002 and PER-005-1. PER-003-1 should simply require an operator, who is performing the real-time reliability related tasks related to the registered entity's applicability, to hold the appropriate valid certification credential.</p>
Response:		
Bonneville Power Administration	Yes	
Brookfield Renewable Power Inc	Yes	
City of Tallahassee (TAL)	Yes	
Gainesville Regional Utilities	Yes	
Nebraska Public Power District	Yes	

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 1 Comment
NERC PCGC	Yes	
PacifiCorp	Yes	
Pepco Holdings, Inc - Affiliates	Yes	
Public Service Enterprise Group Inc. Companies	Yes	
South Carolina Electric and Gas	Yes	
Southern Company Transmission	Yes	
FirstEnergy	Yes	Although we agree with the Purpose statement as proposed, we ask the SDT to consider changing the phrase "Certification Process" to the official name of the program as shown on NERC's website: "System Operator Certification Program".
Response:		
NERC Standards Review Subcommittee	Yes	This "purpose" statement is clear, direct and should be the basis of this proposed NERC Standard. It simply states that a RC, BA and TOP shall ensure that all Real-time System Operator positions have a valid NERC certificate.
Response:		

2. In The effective date of the draft standard reads “In those jurisdictions where regulatory approval is required, this standard shall become effective the first calendar day of the first calendar quarter six 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 six months after Board of Trustees adoption”.

Do you agree with the effective date as written for this standard? If not, please explain in the comment area.

Summary Consideration:

Organization	Yes or No	Question 2 Comment
E.ON U.S. LLC		
American Electric Power (AEP)		If any existing certifications are significantly modified or if additional certifications are added in the future, preparation time well beyond six months will be necessary for registered entities to become fully compliant.
Response:		
Hydro-Québec TransEnergie (HQT)	No	As written, the proposed standard would become effective at different times in different jurisdictions. In performing their tasks, RCs, TOPs, and BAs need to communicate with their counterparts in neighboring jurisdictions. The level of competency (or lack of it) of staff with real-time operating responsibilities could adversely affect the reliability of the Bulk Electric System.
Northeast Power Coordinating Council	No	As written, the proposed standard would become effective at different times in different jurisdictions. In performing their tasks, RCs, TOPs, and BAs need to communicate with their counterparts in neighboring jurisdictions. The level of competency (or lack of it) of staff with real-time operating responsibilities could adversely affect the reliability of the Bulk Electric System.
Response:		
Platte River Power Authority Operations Group	No	Demonstration of minimum competency and maintaining certification for system operators is covered under PER-005-1 which has been approved by NERC and is awaiting regulatory approval. PER-005-1 has a 24 month implementation plan and we believe that without the suggested wording changes in questions 3, 4 and

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 2 Comment
		5 the implementation of this standard should not take effect until PER-005-1 is effective.
Response:		
ISO RTO Council Standards Review Committee	No	If compliance does not require extensive training and/or documentation changes from existing available training, then six months is appropriate. However, we reserve our right to change the response to this question dependent upon the final version of the proposed requirements.
Response:		
Brookfield Renewable Power Inc	No	Uncertain if my Operators need certification. If they do the timelines are too short to meet the standard.
Response:		
BCTC	Yes	
Bonneville Power Administration	Yes	
City of Tallahassee (TAL)	Yes	
Consumers Energy Company	Yes	
Duke Energy	Yes	
Entergy Services	Yes	
ERCOT ISO	Yes	
FirstEnergy	Yes	
Gainesville Regional Utilities	Yes	
Georgia System Operations Corporation	Yes	

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 2 Comment
Independent Electricity System Operator	Yes	
IPCo	Yes	
ISO New England Inc.	Yes	
Long Island Power Authority	Yes	
Manitoba Hydro	Yes	
Nebraska Public Power District	Yes	
NERC PCGC	Yes	
NIPSCO	Yes	
Pacific Gas and Electric Company	Yes	
PacifiCorp	Yes	
Pepco Holdings, Inc - Affiliates	Yes	
Public Service Enterprise Group Inc. Companies	Yes	
SERC Standards Review Group	Yes	
South Carolina Electric and Gas	Yes	
Southern Company Transmission	Yes	

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 2 Comment
Transmission and Reliability (TRO), TVA	Yes	
US Bureau of Reclamation	Yes	
WECC Operations Training Subcommittee	Yes	
Xcel Energy	Yes	
American Transmission Company	Yes	ATC does agree with the proposed effective date if the evidence to demonstrate compliance is limited to showing that our System Operators have a valid NERC Certificate.
Response:		
NERC Standards Review Subcommittee	Yes	N/A
Alberta Electric System Operator	Yes	Please see the RTO/ISO SRC comments.
Response:		
Midwest ISO Stakeholder Standards Collaborators	Yes	These changes do not represent a significant change from what industry currently practices so a long implementation is not necessary.
Response:		

3. Requirement R1 of the draft standard reads:

R1. Each Reliability Coordinator shall staff its real-time operating positions with System Operators who have demonstrated minimum competency in the areas listed to obtain and maintain a valid NERC Reliability Operator certificate.

1.1 Areas of Competency

- 1.1.1 Resources 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 and Reliability Operations and Coordination

Do you agree with Requirement R1 as written for this standard? If not, please explain in the comment area.

Summary Consideration:

Organization	Yes or No	Question 3 Comment
PacifiCorp		
Public Service Enterprise Group Inc. Companies	No	1.1.4 System Operations. This term needs to be specifically defined, either in this Standard or the NERC Glossary. Absent a clear definition, this term introduces a vagueness into the proposed standard that will make both compliance and enforcement problematic. The definition should be vetted in an open process so that industry comment can be obtained.

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 3 Comment
Response:		
IPCo	No	Area of competencies are not part of the certification.
Response:		
Independent Electricity System Operator	No	As stated in question #1, the use of the terms “demonstrated competency” is not appropriate. However, those terms have now been combined with the word “minimum”, which now poses the question, how does one define minimum competency? The areas of competency listed simply reflect the grouping and organization of NERC Standards which the Reliability Coordinator Certification exam is based upon. If this standard is really intended to prescribe which NERC Standards each certification exam is to be based upon perhaps it should simply state that.Suggested alternative wording of R1:R1. Each Reliability Coordinator shall staff its real-time operating positions with System Operators who have obtained and maintain a valid NERC Reliability Operator certificate through the NERC Certification Process. The Reliability Operator certification exam shall have content that ensures the System Operator has knowledge in the following areas:1.1 Areas of Knowledge 1.1.1 Resources 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 and Reliability Operations and Coordination
Response:		
Hydro-Québec TransEnergie (HQT)	No	As the Standard is currently drafted, there appears to be no distinction among personnel in a control room that may be performing the Reliability Coordinator functions and other functions. For example, there may be multiple desks in one control room and, based on responsibilities and duties, they may not all need to be staffed with RC certified personnel. This is clearer in the Measures Section, and also in the existing Standard which reads “Positions that have the primary responsibility, either directly or through communications with others, for the real-time operation of the interconnected Bulk Electric System.” We believe the “responsibility for real-time operation” phrase is the key to any certification Standard.The real-time operating positions need to be staffed with qualified (certified) System Operators requires definition. There are Transmission Owners that have other real-time operating and supervisory positions in the control room that support BES operations, but not necessarily System Operator functions. Suggest tying the requirements to decision making authority.”Minimum competency” must be defined, and how it relates to continuing education. Requirement R1, item 1.1 Reliability Operator Areas of Competency reflects the areas on the NERC Reliability Operator Certification Exam. There does not appear to be a connection to the Continuing Education Program. The Continuing Education Program defines the continuing education hours needed for the different certifications.

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 3 Comment
		<p>PER-002 and to be approved PER-005 require 32 Hours of Emergency Operations training. Nowhere does it break down the competencies to those identified on the NERC Reliability Operator Certification Exam. Additionally, the areas of the NERC Certification Exam changed in 2007. Prior to 2007, there were only 4 areas (Emergency Operations, Guides and Procedures, System Reliability, and Transmission Operations). It is not clear how the difference in the NERC Certification Exams taken by those prior to 2007 and demonstration of Competencies will be addressed since the exam coverage areas are not the same. Both "Transmission Operations" (1.1.2) and "System Operations" (1.1.4) are listed. Clarify the terms "System Operations" in 1.1.4, and "Transmission Operations", and clarify the differences between them. Also, in R2 and R3 there are items 2.2 and 3.2 which list the certificates. Wouldn't it be appropriate to have an item "1.2 Certificates" for R1 as well?</p>
<p>Response:</p>		
<p>ISO New England Inc.</p>	<p>No</p>	<p>As the Standard is currently drafted, there appears to be no distinction among personnel in a control room that may be performing the Reliability Coordinator and other functions. For example, there may be multiple desks in one control room and, based on responsibilities and duties, they may not all need to be staffed with RC certified personnel. This is more clear in the Measures section and indeed is more clear in the existing Standard, that reads, "Positions that have the primary responsibility, either directly or through communications with others, for the real-time operation of the interconnected Bulk Electric System." We believe the "responsibility for real-time operation" phrase is key to any certification Standard.</p>
<p>Response:</p>		
<p>Northeast Power Coordinating Council</p>	<p>No</p>	<p>As the Standard is currently drafted, there appears to be no distinction among personnel in a control room that may be performing the Reliability Coordinator and other functions. For example, there may be multiple desks in one control room and, based on responsibilities and duties, they may not all need to be staffed with RC certified personnel. This is clearer in the Measures Section, and also in the existing Standard which reads "Positions that have the primary responsibility, either directly or through communications with others, for the real-time operation of the interconnected Bulk Electric System." We believe the "responsibility for real-time operation" phrase is the key to any certification Standard. The real-time operating positions need to be staffed with qualified (certified) System Operators requires definition. There are Transmission Owners that have other real-time operating and supervisory positions in the control room that support BES operations, but not necessarily System Operator functions. Suggest tying the requirements to decision making authority. "Minimum competency" must be defined, and how it relates to continuing education. The party responsible for administering and tracking continuing education must be identified. Would the NERC SOCCED database be the proper location for certification administration record keeping? Requirement R1,</p>

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 3 Comment
		<p>sub-requirement 1.1 Reliability Operator Areas of Competency reflects the areas on the NERC Reliability Operator Certification Exam. There does not appear to be a connection to the Continuing Education Program. The Continuing Education Program defines the continuing education hours needed for the different certifications. PER-002 and to be approved PER-005 require 32 Hours of Emergency Operations training. Nowhere does it break down the competencies to those identified on the NERC Reliability Operator Certification Exam. Additionally, the areas of the NERC Certification Exam changed in 2007. Prior to 2007, there were only 4 areas (Emergency Operations, Guides and Procedures, System Reliability, and Transmission Operations). It is not clear how the difference in the NERC Certification Exams taken by those prior to 2007 and demonstration of Competencies will be addressed since the exam coverage areas are not the same. Both "Transmission Operations" (1.1.2) and "System Operations" (1.1.4) are listed. Clarify the terms "System Operations" in 1.1.4, and "Transmission Operations", and clarify the differences between them.</p>
Response:		
Nebraska Public Power District	No	<p>Concerning this Requirement, NPPD has the following concerns and request that the requirement is rewritten to read: R1. "Each Reliability Coordinator shall staff its real-time operating positions responsible for the control of the Bulk Electric System with System Operators that have a valid NERC Reliability Operator certificate which contain competencies as defined by the NERC System Operator Certification Program. Trainees may perform critical tasks only under the direct, continuous supervision and observation of the NERC certified individual filling the required position." NPPD believes this recommended change to the proposed standard is equally efficient and effective as the recommendations outlined in FERC Order 693 for the following reasons. 1. The Purpose of this Standard is to ensure System Operators performing reliability-related task have demonstrated competency through a Certification Process. In other words, Real Time System Operators possess a valid NERC Certificate. This has been a recommendation in the 14 August 2003 Blackout report and the Load Loss event in the State of Florida on 26 February 2008. NPPD agrees that System Operators need to be NERC Certified. 2. The statement of "demonstrated minimum competency" will and has lead to confusion and allows for interpretation since this is not defined and does not have an established basis. This is an unclear statement and NPPD recommends that it be deleted. 3. The use of the word "obtain" is not a registered entity responsibility. The NERC System Operator Certification Program has the responsibility of ensuring that the competencies are demonstrated in order for a person to "obtain" a valid NERC Operator certificate, not the individual registered entity. The NERC System Operator Certification Program has processes in place for ensuring that competencies are current. It is much easier for the NERC System Operator Certification Program to update a NERC test competency than to update a NERC Standard. 4. The use of the word "maintain" crosses over into the well established NERC's SOCCED program of Continuing Education Hours (CEH) for maintaining of a valid NERC Certificate. Currently the NERC SOCCED program has three areas of obtaining CEHs, Continuing Education hours, NERC Standard hours,</p>

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 3 Comment
		<p>and Simulation hours. Before any hour of credit can be awarded to a NERC Certified System Operator, there is a rigorous Individual Learning Activity (ILA) that must be approved by NERC. It is apparent that the proposed competencies within this Standard are fulfilled by the NERC SOCCED education program. 5. Understand that Competencies are important for the basis of a training program, but the posting of these competencies within this standard go against the Systematic Approach to Training (SAT) as described in BOT approved PER-005-1. The SAT process is a detailed task analysis to ensure that all competencies are trained to a minimum level per function of the System Operator. The requirement must also align with the purpose statement. NPPD recommends adding the phrase “responsible for the control of the Bulk Electric System” after “real-time operating positions” to better align with the purpose of the standard. “Real-time operating positions” is not a clear and concise term and leads to ambiguity regarding which positions are required to be certified. The proposed standard has excluded language that permits trainees to work under the direction of a NERC Certified System Operator and NPPD would recommend that language be included in the standard that clarifies that trainees may work under the direct and continuous supervision of a NERC Certified individual.</p>
Response:		
NERC Standards Review Subcommittee	No	<p>Concerning this Requirement, the MRO NERC Standards Review Subcommittee (NSRS) has the following concerns and request that the requirement is rewritten to read: R1. “Each Reliability Coordinator shall staff its real-time operating positions with System Operators that have obtained a valid NERC Reliability operator certificates which contain competencies as defined by the NERC System Operator Certification Program. The MRO NSRS believes this recommended change to the proposed standard is equally efficient and effective as the recommendations outlined in FERC Order 693 for the following reasons. 1. The purpose of this standard is to ensure System Operators performing reliability-related tasks have demonstrated competency through a certification process. In other words, Real-time System Operators possess a valid NERC certificate. This has been a recommendation in the 14 August 2003 Blackout report and the load loss event in the State of Florida on 26 February 2008. This subcommittee agrees that System Operators need to be NERC certified. 2. The statement of “demonstrated minimum competency” will and has led to confusion and allows for interpretation since this is not defined and does not have an established basis. This is an unclear statement and we recommend that it be deleted. 3. The use of the word “obtain” is not a registered entity responsibility. The NERC System Operator Certification Program has the responsibility of ensuring that the competencies are demonstrated in order for a person to “obtain” a valid NERC operator certificate, not the individual registered entity. The NERC System Operator Certification Program has processes in place for ensuring that competencies are current. It is much easier for the NERC System Operator Certification Program to update a NERC competency test than to update a NERC Standard. 4. The use of the word “maintain” crosses over into the well established NERC’s SOCCED program of Continuing Education Hours (CEH) for maintaining of a</p>

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 3 Comment
		<p>valid NERC certificate. Currently, the NERC SOCCED program has three areas of obtaining CEHs, continuing education hours, NERC standard hours, and simulation hours. Before any hour of credit can be awarded to a NERC Certified System Operator, there is a rigorous Individual Learning Activity (ILA) that must be approved by NERC. It is apparent that the proposed competencies within this standard are fulfilled by the NERC SOCCED education program. 5. We understand that competencies are important for the basis of a training program, but the posting of these competencies within this standard go against the Systematic Approach to Training (SAT) as described in the BOT approved PER-005-1. The SAT process is a detailed task analysis to ensure that all competencies are trained to a minimum level per function of the System Operator.</p>
Response:		
Platte River Power Authority Operations Group	No	<p>Demonstration of minimum competency for the Reliability Operator and maintaining certification is covered under PER-005-1. The requirement should read: Each Reliability Coordinator shall staff its real-time operating positions with System Operators who have demonstrated minimum competency through the NERC system operator certification program in the areas listed to obtain a valid NERC Reliability Operator certificate.</p>
Response:		
Brookfield Renewable Power Inc	No	Do not believe it applies to us.
Response:		
ERCOT ISO	No	ERCOT ISO doesn't agree that competencies should be defined in the standard since they are already defined in the certification process.
Response:		
Georgia System Operations Corporation	No	<p>Instead of listing the areas of competency why not refer to the System Operator Certification program. The statement below may be better wording. Each Reliability Coordinator shall staff its real-time operating positions with system operators who have met the minimum knowledge requirements of the System Operator Certification program to obtain and maintain a valid NERC Reliability Operator Certificate.</p>
Response:		

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 3 Comment
Long Island Power Authority	No	LIPA suggests clarifying the term "real-time operating positions". It is our opinion that not all real time operating personnel are responsible for control of the Bulk Electric System. We also do not agree that the Registered Entity should be required to provide evidence that the System Operator was able to obtain a NERC certificate. NERC is responsible for the validity of its certification program. The requirement should relate to possessing a valid certificate. We suggest alternative phrasing: "Each Reliability Coordinator shall staff its real-time operating positions responsible for the control of the BES with System Operators who possess a valid and current NERC Reliability Operator Certificate."
Response:		
E.ON U.S. LLC	No	Operators must successfully complete the NERC Reliability Operator certification process. Thus, adding "Areas of Competency" in the requirement is redundant and only confuses what is needed for compliance. If "demonstration of minimum competency" is different from the NERC certification process then criteria for demonstrating such competencies need to be set forth in R1. Because each system is unique E.ON U.S. does not believe ongoing minimum competency criteria beyond certification lends itself to a continent-wide standard with objectively determined measures. E.ON U.S. suggests the wording of R1 be revised to: Each Reliability Coordinator shall staff its real-time operating positions with System Operators who hold a valid NERC Reliability Operator certificate.
Response:		
American Electric Power (AEP)	No	Please reference related comments stated in question #1. The existing version 0 language is consistent with our recommendation that the minimum competency reference should be removed from the PER-003-1 Standard and, more appropriately, be identified in the System Operator Certification Program Manual, and in PER-002 and -005 standards. R1 should merely state that each registered applicable Reliability Coordinator (RC) entity shall staff its real-time operating positions with an operator who holds and maintains a valid Reliability Operator certification credential. AEP does believe that language from Version 0 (Measure M1) and its sub-measures should be maintained by establishing a sub-requirement or notation in R1 to allow operators without a valid applicable NERC certification credential, while in training or during an emergency, to perform reliability related tasks under the direct, continuous supervision and observation of a NERC-certified individual filling the position.
Response:		

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 3 Comment
American Transmission Company	No	Please see are specific comments in question 4. Proposed Modification: Each RC shall staff its real-time operating positions with System Operators that have a valid NERC Reliability Operator certificate.ATC suggest that the list of minimum competency be deleted.
Response:		
NIPSCO	No	R1 should be replaced by “Each Reliability Coordinator shall staff its real-time operating positions with System Operators who have a valid NERC Reliability Operator certificate”.Then the “Reliability Operator Certificate” and certification process should be defined in the Glossary of Terms or described within the standard.
Response:		
US Bureau of Reclamation	No	The certification should be specific in the citation by referring to the certification as N/RA/RC certification as appropriate for Reliability Coordinators. The Standard also does not specifically reference the manual (System Operator Certification Program Manual-Final May 2006) upon which the certifications are based. The standard should be unambiguous with respect to how the certification is to be achieved. It will be difficult to track the compliance if the Manual is changed. Since certification is now tied to the manual through this requierment, the manual processes defined in the manual become a defacto requirement and subject to the standards approval process. The examination outline should also be included.
Response:		
ISO RTO Council Standards Review Committee	No	The competencies should be addressed in the development of the certification exam and NOT in this standard. This standard should simply require the operators to obtain the requisite certification.As stated in the response to Question #1, we believe “competency” extends beyond existing NERC examinations. Basing R1 on NERC Certification only demonstrates a level of knowledge, not competency.The inclusion of the Areas of Competency should not be included in this requirement. There are no measures for this.. The inclusion of this list in the standard adds confusion and uncertainty in the demonstration of compliance with requirement R1.As the Standard is currently drafted, there appears to be no distinction among personnel in a control room that may be performing the Reliability Coordinator and other functions. For example, there may be multiple desks in one control room and, based on responsibilities and duties, they may not all need to be staffed with RC certified personnel. This is more clear in the Measures section and indeed is more clear in the existing Standard, that reads, “Positions that have the primary responsibility, either directly or through communications with others, for the real-time operation of the interconnected Bulk Electric System.” We believe the

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 3 Comment
		"responsibility for real-time operation" phrase is key to any certification Standard.
Response:		
Consumers Energy Company	No	The extra verbiage under "Areas of Competency" is unnecessary. The Certification Process will determine what is demonstrated. The only thing the entity has control over is whether their operating staff is certified. Attempting to task each entity in defining the Certification requirements is unfair and not achievable. Leave the Certification Process writers to do the work of defining the Certification Process and the Operating entities worry about their staff being certified in accordance with that process.
Response:		
Pepco Holdings, Inc - Affiliates	No	The language in the Requirement doesn't match the language in the Measure. The sentence in R1 should read "...by obtaining and maintaining a valid NERC Reliability Operator certificate." Not "to obtain and maintain."
Response:		
Xcel Energy	No	The listing of the competencies is related to the entity (ERO) administering the certification process and do not belong in this standard. Consideration should be given to establishing a standard for the ERO outlining the minimum competencies required to be addressed in the certification program. This requirement should only address the minimum level of certification required for the Reliability Coordinator. For simplicity, all of the minimum certification requirements for each operator could be condensed into a table.
Response:		
Manitoba Hydro	No	The measures do not match the purpose and requirements. In both the purpose statement and requirements "competency" is mentioned, yet there is no measures in place for this. NERC certification alone does not guarantee competency. Our definition for competency is it encompasses a combination of knowledge, skills, and behavior to perform a specific role. Yes there does not appear to be any linkage to the measures for skills and behaviors. This leaves it open for interpretation by auditors in the future and will end up being a potential hindrance to improving the competence of System Operating personnel across the industry.
Response:		

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 3 Comment
Alberta Electric System Operator	No	The minimum competency reference should be removed and the areas of competency deleted. The SDT does not provide a definition of competencies, nor is there a reference in how one would prove someone is competent by taking and passing an exam. Remove the reference to maintaining the certificate and change to hold a valid certificate. Suggest the wording read "Each RC shall staff its real-time operating positions with System Operators who hold a valid NERC RC Certification." Add sub-requirement 1.1 as an exception to R1 to allow operators in training without a valid NERC Certificate as in the measures section of PER-003-0.
Response:		
BCTC	No	The minimum competency reference should be removed and the areas of competency deleted. Remove the reference to maintaining the certificate and change to hold a valid certificate. Suggest the wording read "Each RC shall staff its real-time operating positions with System Operators who hold a valid NERC RC Certification." Add sub-requirement 1.1 as an exception to R1 to allow operators in training without a valid NERC Certificate as in the measures section of PER-003-0.
Response:		
NERC PCGC	No	The minimum competency reference should be removed and the areas of competency deleted. Remove the reference to maintaining the certificate and change to hold a valid certificate. Suggested wording would read "Each RC shall staff its real-time operating positions with System Operators who hold a valid NERC RC Certificate. This certificate demonstrates competencies through the NERC certification process." Specific competencies do not need to be included in this standard. The certification process identifies specific competencies based on periodic job analysis. The development of competencies based on job analysis is a well established process as provided by National Organization for Competency Assurance (NOCA) and American National Standard Institute (ANSI) guidelines.
Response:		
Pacific Gas and Electric Company	No	The minimum competency reference should be removed and the areas of competency deleted. The SDT does not provide a definition of competencies, nor is there a reference in how one would prove someone is competent by taking and passing an exam. Remove the reference to maintaining the certificate and change to hold a valid certificate. Suggest the wording read "Each RC shall staff its real-time operating positions with System Operators who hold a valid NERC RC Certification." Add sub-requirement 1.1 as an exception to R1 to allow operators in training without a valid NERC Certificate as in the measures section of PER-003-0.

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 3 Comment
WECC Operations Training Subcommittee	No	The minimum competency reference should be removed and the areas of competency deleted. The SDT does not provide a definition of competencies, nor is there a reference in how one would prove someone is competent by taking and passing an exam. Remove the reference to maintaining the certificate and change to hold a valid certificate. Suggest the wording read "Each RC shall staff its real-time operating positions with System Operators who hold a valid NERC RC Certification." Add sub-requirement 1.1 as an exception to R1 to allow operators in training without a valid NERC Certificate as in the measures section of PER-003-0.
Response:		
Midwest ISO Stakeholder Standards Collaborators	No	The standard as written requires minimum competency. "At least" needs to be added before minimum competency otherwise a strict reading would mean that exceeding minimum competency is not compliant. The requirement should be rewritten to: "Each Reliability Coordinator shall staff its real-time operating positions with System Operators who hold a current, valid NERC Reliability Operator certificate." As the requirement is currently written, one could read the requirement to mean that a minimum competency must be demonstrated separately from obtaining and maintaining a valid NERC Reliability Operator certificate or that minimum competency is demonstrated by obtaining and maintaining a valid NERC Reliability Operator certificate. We are assuming the latter is what is intended. The suggested wording more clearly conveys that latter meaning. While adding areas of competency addresses FERC directives, it does not add any value to the standard by furthering reliability. What is really needed is a standard that applies to the ERO on what the certification process must demonstrate and contain. These areas of competency in this standard do not compel the ERO to guarantee that their certification process ensures that a certified system operator meets these minimum competency levels.
Response:		
Transmission and Reliability (TRO), TVA	No	The standard as written requires minimum competency. Suggest "at least" needs to be added before minimum competency otherwise a strict reading would mean that exceeding minimum competency is not compliant. Recommend the requirement be rewritten to: "Each Reliability Coordinator shall staff its real-time operating positions with System Operators who hold a current, valid NERC Reliability Operator certificate." While adding areas of competency addresses FERC directives, it does not add any value to the standard by furthering reliability. By including these competencies in the standard as sub-requirements it implies the entity is responsible for additional demonstration of competency beyond that of operator certification, which has been identified as the only measure. Recommend these be removed from the standard.

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 3 Comment
Response:		
Entergy Services	No	To “obtain and maintain a valid NERC Reliability Operator certificate” (as stated in R1) a System Operator is required to (1) pass an examination and (2) accumulate a certain number of approved continuing education hours within a certain time period. In our opinion, neither of these requirements ensures that the operator has “demonstrated minimum competency” in the topic areas listed. Furthermore, the list of topics is unnecessary, since the draft standard requires only that the Reliability Operator obtain and maintain a valid certificate. To do so, a Reliability Operator will gain knowledge in all the technical areas listed, plus many more areas (through the accumulation of hours). To list specific topic areas is prescriptive and implies that the operator would have to be knowledgeable in subject areas over and above those required for obtaining/maintaining certification. We suggest R1 be changed to the following: “Each Reliability Coordinator shall staff its real-time operating positions with System Operators who have achieved the minimum level of knowledge required to obtain and maintain a valid NERC Reliability Operator certificate”.
SERC Standards Review Group	No	To “obtain and maintain a valid NERC Reliability Operator certificate” (as stated in R1) a System Operator is required to (1) pass an examination and (2) accumulate a certain number of approved continuing education hours within a certain time period. In our opinion, neither of these requirements ensures that the operator has “demonstrated minimum competency” in the topic areas listed. Furthermore, the list of topics is unnecessary, since the draft standard requires only that the Reliability Operator obtain and maintain a valid certificate. To do so, a Reliability Operator will gain knowledge in all the technical areas listed, plus many more areas (through the accumulation of hours). To list specific topic areas is prescriptive and implies that the operator would have to be knowledgeable in subject areas over and above those required for obtaining/maintaining certification. We suggest R1 be changed to the following: “Each Reliability Coordinator shall staff its real-time operating positions with System Operators who have achieved the minimum level of knowledge required to obtain and maintain a valid NERC Reliability Operator certificate”.
Response:		
FirstEnergy	No	We agree that certain minimum competencies are required for a System Operator to reliably perform reliability-related tasks that effect the Bulk Electric System. However, since NERC's System Operator Certification Program specifically tests for these competencies as listed in the proposed requirements, and then issues a NERC Certificate based on these competencies, we do not see a need to spell out the competencies in the wording of these requirements. The requirements of this standard should be just to obtain the applicable valid NERC certificate and the verbiage in 1.1, 2.1, and 3.1 is not required. If the SDT decides to not remove the verbiage regarding areas of competencies, we ask that the SDT consider revising

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 3 Comment
		<p>the verbiage in main requirements R1, R2, and R3 that states "... who have demonstrated minimum competency in the areas listed to obtain and maintain ...". This statement could be misleading as it may imply that an operator must first demonstrate the competency and then obtain a certificate (i.e two different actions). However, the operator actually demonstrates his competency BY taking the NERC examination which allows the operator to obtain the certificate. We suggest slight rewording of the phrase as follows: "... who have demonstrated minimum competency in the areas listed by obtaining and maintaining ..."</p>
Response:		
Duke Energy	No	<p>We believe that this requirement should be reworded to clarify that only System Operators who fill real-time operating positions and have responsibility for control of the Bulk Electric System must be certified. Also, the way the requirement is currently written, an auditor might erroneously conclude that some demonstrated minimum competency in the listed areas is required, beyond the competency demonstrated by obtaining and maintaining a valid NERC Reliability Operator certificate. Suggested rewording: "Each Reliability Coordinator shall staff its real-time operating positions with System Operators responsible for control of the Bulk Electric System, who have demonstrated minimum competency in the areas listed by obtaining and maintaining a valid NERC Reliability Operator Certificate."</p>
Response:		
Bonneville Power Administration	Yes	
City of Tallahassee (TAL)	Yes	
Gainesville Regional Utilities	Yes	
South Carolina Electric and Gas	Yes	
Southern Company Transmission	Yes	

4. Requirement R2 of the draft standard reads:

R2. Each Transmission Operator shall staff its real-time operating positions with System Operators who have demonstrated minimum competency in the areas listed to obtain and maintain a one of the following valid NERC certificate.

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"

Do you agree with Requirement R2 as written for this standard? If not, please explain in the comment area.

Summary Consideration:

Organization	Yes or No	Question 4 Comment
IPCo	No	area of competencies should not be included in this standard.
Response:		
Hydro-Québec TransEnergie (HQT)	No	As the Standard is currently drafted, there appears to be no distinction among personnel in a control room that may be performing the Transmission Operator functions and other functions. For example, there may be

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 4 Comment
		<p>multiple desks in one control room and, based on responsibilities and duties, they may not all need to be staffed with TOP certified personnel. This is clearer in the Measures Section, and also in the existing Standard which reads “Positions that have the primary responsibility, either directly or through communications with others, for the real-time operation of the interconnected Bulk Electric System.” We believe the “responsibility for real-time operation” phrase is the key to any certification Standard. The real-time operating positions need to be staffed with qualified (certified) System Operators requires definition. There are Transmission Owners that have other real-time operating and supervisory positions in the control room that support BES operations, but not necessarily System Operator functions. Suggest tying the requirements to decision making authority.” Minimum competency” must be defined, and how it relates to continuing education. Requirement R2, item 2.1 Transmission Operator Areas of Competency reflects the areas on the NERC Reliability Operator, Balancing, Interchange and Transmission Operator, and Transmission Certification Exams. There does not appear to be a connection to the Continuing Education Program. The Continuing Education Program defines the continuing education hours needed for the different certifications. PER-002 and to be approved PER-005 require 32 Hours of Emergency Operations training. Nowhere does it break down the competencies to those identified on the NERC Transmission Operator Certification Exam. Additionally, the areas of the NERC Certification Exam changed in 2007. Prior to 2007, there were only 4 areas (Emergency Operations, Guides and Procedures, System Reliability, and Transmission Operations). It is not clear how the difference in the NERC Certification Exams taken by those prior to 2007 and demonstration of Competencies will be addressed since the exam coverage areas are not the same. Both “Transmission Operations” (2.1.1) and “System Operations” (2.1.3) are listed. Clarify the terms “System Operations” in 2.1.3, and “Transmission Operations”, and clarify the differences between them.</p>
Response:		
ISO New England Inc.	No	<p>As the Standard is currently drafted, there appears to be no distinction among personnel in a control room that may be performing the Transmission Operator and other functions. For example, there may be multiple desks in one control room and, based on responsibilities and duties, they may not all need to be staffed with TOP certified personnel. This is more clear in the Measures section and indeed is more clear in the existing Standard, that reads, “Positions that have the primary responsibility, either directly or through communications with others, for the real-time operation of the interconnected Bulk Electric System.” We believe the “responsibility for real-time operation” phrase is key to any certification Standard.</p>
Response:		
Northeast Power Coordinating	No	<p>As the Standard is currently drafted, there appears to be no distinction among personnel in a control room that may be performing the Transmission Operator and other functions. For example, there may be multiple</p>

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 4 Comment
Council		<p>desks in one control room and, based on responsibilities and duties, they may not all need to be staffed with TOP certified personnel. This is clearer in the Measures Section, and also in the existing Standard which reads "Positions that have the primary responsibility, either directly or through communications with others, for the real-time operation of the interconnected Bulk Electric System." We believe the "responsibility for real-time operation" phrase is the key to any certification Standard. The real-time operating positions need to be staffed with qualified (certified) System Operators requires definition. There are Transmission Owners that have other real-time operating and supervisory positions in the control room that support BES operations, but not necessarily System Operator functions. Suggest tying the requirements to decision making authority. "Minimum competency" must be defined, and how it relates to continuing education. The party responsible for administering and tracking continuing education must be identified. Would the NERC SOCCED database be the proper location for certification administration record keeping? Requirement R2, sub-requirement 2.1 Transmission Operator Areas of Competency reflects the areas on the NERC Reliability Operator, Balancing, Interchange and Transmission Operator, and Transmission Certification Exams. There does not appear to be a connection to the Continuing Education Program. The Continuing Education Program defines the continuing education hours needed for the different certifications. PER-002 and to be approved PER-005 require 32 Hours of Emergency Operations training. Nowhere does it break down the competencies to those identified on the NERC Transmission Operator Certification Exam. Additionally, the areas of the NERC Certification Exam changed in 2007. Prior to 2007, there were only 4 areas (Emergency Operations, Guides and Procedures, System Reliability, and Transmission Operations). It is not clear how the difference in the NERC Certification Exams taken by those prior to 2007 and demonstration of Competencies will be addressed since the exam coverage areas are not the same. Both "Transmission Operations" (2.1.1) and "System Operations" (2.1.3) are listed. Clarify the terms "System Operations" in 2.1.3, and "Transmission Operations", and clarify the differences between them.</p>
Response:		
Nebraska Public Power District	No	<p>Concerning this Requirement, NPPD has the following concerns and request that the requirement is rewritten to read: R2. "Each Transmission Operator shall staff its real-time operating positions responsible for the control of the Bulk Electric System with System Operators that have one of the following valid NERC certificates which contain competencies as defined by the NERC System Operator Certification Program. Trainees may perform critical tasks only under the direct, continuous supervision and observation of the NERC certified individual filling the required position. 2.1 Certificates Reliability Operator Balancing, Interchange and Transmission Operator Transmission Operator" NPPD believes this recommended change to the proposed standard is equally efficient and effective as the recommendations outlined in FERC Order 693 for the following reasons. 1. The Purpose of this Standard is to ensure System Operators performing reliability-related task have demonstrated competency through a Certification Process. In other words, Real</p>

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 4 Comment
		<p>Time System Operators possess a valid NERC Certificate. This has been a recommendation in the 14 August 2003 Blackout report and the Load Loss event in the State of Florida on 26 February 2008. NPPD agrees that System Operators need to be NERC Certified. 2. The statement of “demonstrated minimum competency” will and has lead to confusion and allows for interpretation since this is not defined and does not have an established basis. This is an unclear statement and NPPD recommends that it be deleted.3. The use of the word “obtain” is not a registered entity responsibility. The NERC System Operator Certification Program has the responsibility of ensuring that the competencies are demonstrated in order for a person to “obtain” a valid NERC Operator certificate, not the individual registered entity. The NERC System Operator Certification Program has processes in place for ensuring that competencies are current. It is much easier for the NERC System Operator Certification Program to update a NERC test competency than to update a NERC Standard.4. The use of the word “maintain” crosses over into the well established NERC’s SOCCED program of Continuing Education Hours (CEH) for maintaining of a valid NERC Certificate. Currently the NERC SOCCED program has three areas of obtaining CEHs, Continuing Education hours, NERC Standard hours, and Simulation hours. Before any hour of credit can be awarded to a NERC Certified System Operator, there is a rigorous Individual Learning Activity (ILA) that must be approved by NERC. It is apparent that the proposed competencies within this Standard are fulfilled by the NERC SOCCED education program. 5. Understand that Competencies are important for the basis of a training program, but the posting of these competencies within this standard go against the Systematic Approach to Training (SAT) as described in BOT approved PER-005-1. The SAT process is a detailed task analysis to ensure that all competencies are trained to a minimum level per function of the System Operator. The requirement must also align with the purpose statement. NPPD recommends adding the phrase “responsible for the control of the Bulk Electric System” after “real-time operating positions” to better align with the purpose of the standard. “Real-time operating positions” is not a clear and concise term and leads to ambiguity regarding which positions are required to be certified. The proposed standard has excluded language that permits trainees to work under the direction of a NERC Certified System Operator and NPPD would recommend that language be included in the standard that clarifies that trainees may work under the direct and continuous supervision of a NERC Certified individual.</p>
Response:		
NERC Standards Review Subcommittee	No	<p>Concerning this Requirement, the MRO NSRS has the following concerns and request that the requirement is rewritten to read:R2. “Each Transmission Operator shall staff its real-time operating positions with System Operators that have obtained one of the following valid NERC certificates which contain competencies as defined by the NERC System Operator Certification Program.2.2 Certificates o Reliability Operator o Balancing, Interchange and Transmission Operator o Transmission OperatorThe MRO NSRS believes this recommended change to the proposed standard is equally efficient and effective as the recommendations</p>

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 4 Comment
		<p>outlined in FERC Order 693 for the following reasons.1. The purpose of this standard is to ensure System Operators performing reliability-related task have demonstrated competency through a Certification Process. In other words, Real- time System Operators possess a valid NERC certificate. This has been a recommendation in the 14 August 2003 Blackout report and the load loss event in the State of Florida on 26 February 2008. This subcommittee agrees that System Operators need to be NERC certified. 2. The statement of “demonstrated minimum competency” will and has lead to confusion and allows for interpretation since this is not defined and does not have an established basis. This is an unclear statement and we recommend that it be deleted.3. The use of the word “obtain” is not a registered entity responsibility. The NERC System Operator Certification Program has the responsibility of ensuring that the competencies are demonstrated in order for a person to “obtain” a valid NERC operator certificate, not the individual registered entity. The NERC System Operator Certification Program has processes in place for ensuring that competencies are current. It is much easier for the NERC System Operator Certification Program to update a NERC competency test then to update a NERC Standard.4. The use of the word “maintain” crosses over into the well established NERC’s SOCCED program of Continuing Education Hours (CEH) for maintaining of a valid NERC certificate. Currently, the NERC SOCCED program has three areas of obtaining CEHs, continuing education hours, NERC standard hours, and simulation hours. Before any hour of credit can be awarded to a NERC Certified System Operator, there is a rigorous Individual Learning Activity (ILA) that must be approved by NERC. It is apparent that the proposed competencies within this standard are fulfilled by the NERC SOCCED education program. 5. We understand that competencies are important for the basis of a training program, but the posting of these competencies within this standard go against the Systematic Approach to Training (SAT) as described in the BOT approved PER-005-1. The SAT process is a detailed task analysis to ensure that all competencies are trained to a minimum level per function of the System Operator.</p>
Response:		
Platte River Power Authority Operations Group	No	<p>Demonstration of minimum competency and maintaining certification for the Transmission Operator is covered under PER-005-1. The requirement should read: Each Transmission Operator shall staff its real-time operating positions with System Operators who have demonstrated minimum competency through the NERC system operator certification program in the areas listed to obtain one of the following valid NERC certificates.</p>
Response:		
ERCOT ISO	No	<p>ERCOT ISO doesn’t agree that competencies should be defined in the standard since they are already defined in the certification process.</p>

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 4 Comment
Response:		
Entergy Services	No	For the reasons stated in question #3 above, we suggest R2 be changed to the following: "Each Transmission Operator shall staff its real-time operating positions with System Operators who have achieved the minimum level of knowledge required to obtain and maintain one of the following valid NERC certificates: o Reliability Operator o Balancing, Interchange and Transmission Operator o Transmission Operator"
SERC Standards Review Group	No	For the reasons stated in question #3 above, we suggest R2 be changed to the following: "Each Transmission Operator shall staff its real-time operating positions with System Operators who have achieved the minimum level of knowledge required to obtain and maintain one of the following valid NERC certificates: o Reliability Operator o Balancing, Interchange and Transmission Operator o Transmission Operator"
Response:		
Georgia System Operations Corporation	No	Instead of listing the areas of competency why not refer to the System Operator Certification program. The statement below may be better wording. Each Transmission Operator shall staff its real-time operating positions with system operators who have met the minimum knowledge requirements of the System Operator Certification program to obtain and maintain one of the following valid NERC Certificates: 1. Reliability Operator 2. Balancing, Interchange, and Transmission Operator 3. Transmission Operator 4. Balancing and Interchange Operator
Response:		
US Bureau of Reclamation	No	It is not clear why the certificates include those for Reliability Operator, or Balancing, Interchange and Transmission Operator. The Standard also does not specifically reference the manual (System Operator Certification Program Manual-Final May 2006) upon which the certifications are based. The standard should be unambiguous with respect to how the certification is to be achieved. It will be difficult to track the compliance if the Manual is changed. Since certification is now tied to the manual through this requirement, the manual processes defined in the manual become a defacto requirement and subject to the standards approval process. The examination outline should also be included.
Response:		
Long Island Power Authority	No	LIPA suggests clarifying the term "real-time operating positions". It is our opinion that not all real time operating personnel are responsible for control of the Bulk Electric System. We also do not agree that the

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 4 Comment
		Registered Entity should be required to provide evidence that the System Operator was able to obtain a NERC certificate. NERC is responsible for the validity of its certification program. The requirement should relate to possessing a valid certificate. We suggest alternative phrasing: "Each Transmission Operator shall staff its real-time operating positions responsible for the control of the BES with System Operators who possess one of the following valid and current NERC Certificates:"
Response:		
E.ON U.S. LLC	No	Operators must hold one of the listed NERC certificates. Thus, adding "Areas of Competency" in the requirement is redundant and only confuses what is needed for compliance.If "demonstration of minimum competency" is different from the NERC certification process then criteria for demonstrating such competencies need to be set forth in R2. Because each system is unique E.ON U.S. does not believe ongoing minimum competency criteria beyond certification lends itself to a continent-wide standard with objectively determined measures.E.ON U.S. suggests the wording of R2 be revised to:Each Transmission Operator shall staff its real-time operating positions with System Operators who hold a valid NERC certificate listed in R2.2.
Response:		
American Electric Power (AEP)	No	Please reference related comments stated in question #1. The existing version 0 language is consistent with our recommendation that the minimum competency reference should be removed from the PER-003-1 Standard and, more appropriately, be identified in the System Operator Certification Program Manual, and in PER-002 and -005 standards. R2 should merely state that each registered applicable Transmission Operator (TO) entity shall staff its real-time operating positions with an operator who holds and maintains a valid Transmission Operator, Balancing, Interchange and Transmission Operator or Reliability Operator certification credential. AEP does believe that language from Version 0 (Measure M1) and its sub-measures should be maintained by establishing a sub-requirement or notation in R2 to allow operators without a valid applicable NERC certification credential, while in training or during an emergency, to perform reliability related tasks under the direct, continuous supervision and observation of a NERC-certified individual filling the position.
Response:		
Public Service Enterprise Group Inc. Companies	No	Please see response to question 3 with respect to the need to define System Operations.

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 4 Comment
Response:		
NIPSCO	No	R2 should be replaced by “Each Transmission Operator shall staff its real-time operating positions with System Operators who have one of the following valid NERC certificates:” and leave the contents of 2.2. (listing the certificates is a nice addition to the standard). Then the certificates and certification process should be defined in the Glossary of Terms or described within the standard.
Response:		
Independent Electricity System Operator	No	Same comments as in question #4. Suggested alternative wording of R2: R2. Each Transmission Operator shall staff its real-time operating positions with System Operators who have obtained and maintain a valid NERC certificate through the NERC Certification Process. The Transmission Operator certification exam shall have content that ensures the System Operator has knowledge in the following areas: 2.1 Areas of Knowledge 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 Valid Certificates o Reliability Operator o Balancing, Interchange and Transmission Operator o Transmission Operator
Response:		
ISO RTO Council Standards Review Committee	No	The competencies should be addressed in the development of the certification exam and NOT in this standard. This standard should simply require the operators to obtain the requisite certification. As stated in the response to Question #1, we believe “competency” extends beyond existing NERC examinations. Basing R1 on NERC Certification only demonstrates a level of knowledge, not competency. As the Standard is currently drafted, there appears to be no distinction among personnel in a control room that may be performing the Transmission Operator and other functions. For example, there may be multiple desks in one control room and, based on responsibilities and duties, they may not all need to be staffed with TOP certified personnel. This is more clear in the Measures section and indeed is more clear in the existing Standard, that reads, “Positions that have the primary responsibility, either directly or through communications with others, for the real-time operation of the interconnected Bulk Electric System.” We believe the “responsibility for real-time operation” phrase is key to any certification Standard.
Response:		
Consumers Energy Company	No	The extra verbiage under “Areas of Competency” is unnecessary. The Certification Process will determine what is demonstrated. The only thing the entity has control over is whether their operating staff is certified.

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 4 Comment
		Attempting to task each entity in defining the Certification requirements is unfair and not achievable. Leave the Certification Process writers to do the work of defining the Certification Process and the Operating entities worry about their staff being certified in accordance with that process.
Response:		
Pepco Holdings, Inc - Affiliates	No	The language in the Requirement doesn't match the language in the Measure. The sentence in R2 should read "...by obtaining and maintaining one of the following valid NERC certificates." Not "to obtain and maintain."
Response:		
Xcel Energy	No	The listing of the competencies is related to the entity (ERO) administering the certification process and do not belong in this standard. Consideration should be given to establishing a standard for the ERO outlining the minimum competencies required to be addressed in the certification program. This requirement should only address the minimum level of certification required for the Transmission Operator. For simplicity, all of the minimum certification requirements for each operator could be condensed into a table.
Response:		
Manitoba Hydro	No	The measures do not match the purpose and requirements. In both the purpose statement and requirements "competency" is mentioned, yet there is no measures in place for this. NERC certification alone does not guarantee competency. Our definition for competency is it encompasses a combination of knowledge, skills, and behavior to perform a specific role. Yes there does not appear to be any linkage to the measures for skills and behaviors. This leaves it open for interpretation by auditors in the future and will end up being a potential hindrance to improving the competence of System Operating personnel across the industry.
Response:		
Alberta Electric System Operator	No	The minimum competency reference should be removed and the areas of competency deleted. The SDT does not provide a definition of competencies, nor is there a reference in how one would prove someone is competent by taking and passing an exam. Remove the reference to maintaining the certificate and change to hold a valid certificate. Suggest the wording read "Each TO shall staff its real-time operating positions with System Operators who hold one of the following valid NERC Certificates: o Reliability Operator o Balancing, Interchange and Transmission Operator o Transmission Operator Add sub-requirement 2.1 as an exception

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 4 Comment
		to R2 to allow operators in training without a valid NERC Certificate as in the measures section of PER-003-0.
Response:		
BCTC	No	The minimum competency reference should be removed and the areas of competency deleted. Remove the reference to maintaining the certificate and change to hold a valid certificate. Suggest the wording read "Each TO shall staff its real-time operating positions with System Operators who hold a valid NERC RC Certification." Add sub-requirement 1.1 as an exception to R1 to allow operators in training without a valid NERC Certificate as in the measures section of PER-003-0.
Response:		
NERC PCGC	No	The minimum competency reference should be removed and the areas of competency deleted. Remove the reference to maintaining the certificate and change to hold a valid certificate. Suggested wording would read "Each TO shall staff its real-time operating positions with System Operators who hold a valid NERC TO Certificate. This certificate demonstrates competencies through the NERC certification process." Specific competencies do not need to be included in this standard. The certification process identifies specific competencies based on periodic job analysis. The development of competencies based on job analysis is a well established process as provided by National Organization for Competency Assurance (NOCA) and American National Standard Institute (ANSI) guidelines.
Response:		
Pacific Gas and Electric Company	No	The minimum competency reference should be removed and the areas of competency deleted. The SDT does not provide a definition of competencies, nor is there a reference in how one would prove someone is competent by taking and passing an exam. Remove the reference to maintaining the certificate and change to hold a valid certificate. Suggest the wording read "Each TO shall staff its real-time operating positions with System Operators who hold a valid NERC RC, TO or BA Certification." Add sub-requirement 1.1 as an exception to R1 to allow operators in training without a valid NERC Certificate as in the measures section of PER-003-0.
Response:		
WECC Operations Training Subcommittee	No	The minimum competency reference should be removed and the areas of competency deleted. The SDT does not provide a definition of competencies, nor is there a reference in how one would prove someone is

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 4 Comment
		<p>competent by taking and passing an exam. Remove the reference to maintaining the certificate and change to hold a valid certificate. Suggest the wording read "Each TO shall staff its real-time operating positions with System Operators who hold a valid NERC RC, TO or BA Certification." Add sub-requirement 1.1 as an exception to R1 to allow operators in training without a valid NERC Certificate as in the measures section of PER-003-0.</p>
<p>Response:</p>		
<p>American Transmission Company</p>	<p>No</p>	<p>The proposed language could be read to have multiple compliance obligations and should be re-written to have single compliance obligations. The two compliance obligations: A) Transmission Operators have NERC Certified System Operators B) Transmission Operators have to demonstrate minimum competency in specific areas. Item (A) Based on the proposed measures entities can demonstrate that they have NERC Certified System Operators by producing valid NERC certificates. Item (B) ATC believes that the phrase "demonstration of minimum competency" can be deleted because having NERC Certified System Operators means having System Operators that have these minimum competencies. Does this phrase require us to show evidence above and beyond the NERC Certificate? If so, then the Measures do not provide any information on the types of evidence that could be used for compliance. If not, then it is our suggestion that the SDT deleted the minimum competency list from the requirement because it is duplicative with having NERC Certified System Operators. It's our understanding that the team is including this language "demonstrate minimum competency" to address a FERC directive but we believe that the best approach is to provide FERC with a description of the NERC Certification program and exclude the minimum competency list from this standard. We proposed the following modifications: Transmission Operators shall staff its real-time operating positions with System Operators that have one of the following valid NERC Certification. Reliability Operator Balancing, Interchange and Transmission Operator Transmission Operator ATC also recommends the removal of the phrase "obtain and maintain" because the requirement requires a valid NERC Certificate. All NERC Certificates have an effective period, and is therefore redundant to require System Operators to "obtain and maintain" their NERC Certificate because an entity would be non-compliant with this Standard if they allow an individual to work the real-time desk without a valid NERC Certificate.</p>
<p>Response:</p>		
<p>Midwest ISO Stakeholder Standards Collaborators</p>	<p>No</p>	<p>The standard as written requires minimum competency. "At least" needs to be added before minimum competency otherwise a strict reading would mean that exceeding minimum competency is not compliant. The requirement should be rewritten to: "Each Transmission Operator shall staff its real-time operating positions with System Operators who hold a current, valid NERC Reliability Operator; Balancing, Interchange and Transmission Operator; or Transmission Operator certificate." As the requirement is currently written, one</p>

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 4 Comment
		<p>could read the requirement to mean that a minimum competency must be demonstrated separately from obtaining and maintaining a valid NERC Reliability Operator certificate or that minimum competency is demonstrated by obtaining and maintaining a valid NERC Reliability Operator certificate. We are assuming the latter is what is intended. The suggested wording more clearly conveys that latter meaning. While adding areas of competency addresses FERC directives, it does not add any value to the standard by furthering reliability. What is really needed is a standard that applies to the ERO on what the certification process must demonstrate and contain. These areas of competency in this standard do not compel the ERO to guarantee that their certification process ensures that a certified system operator meets these minimum competency levels.</p>
<p>Response:</p>		
<p>Tranmission and Reliability (TRO), TVA</p>	<p>No</p>	<p>The standard as written requires minimum competency. Suggest “at least” needs to be added before minimum competency otherwise a strict reading would mean that exceeding minimum competency is not compliant. Recommend the requirement be rewritten to: “Each Transmission Operator shall staff its real-time operating positions with System Operators who hold a current, valid NERC Reliability Operator; Balancing, Interchange and Transmission Operator; or Transmission Operator certificate.” While adding areas of competency addresses FERC directives, it does not add any value to the standard by furthering reliability. By including these competencies in the standard as sub-requirements it implies the entity is responsible for additional demonstration of competency beyond that of operator certification, which has been identified as the only measure. Recommend these be removed from the standard.</p>
<p>Response:</p>		
<p>FirstEnergy</p>	<p>No</p>	<p>We agree that certain minimum competencies are required for a System Operator to reliably perform reliability-related tasks that effect the Bulk Electric System. However, since NERC's System Operator Certification Program specifically tests for these competencies as listed in the proposed requirements, and then issues a NERC Certificate based on these competencies, we do not see a need to spell out the competencies in the wording of these requirements. The requirements of this standard should be just to obtain the applicable valid NERC certificate and the verbiage in 1.1, 2.1, and 3.1 is not required. If the SDT decides to not remove the verbiage regarding areas of competencies, we ask that the SDT consider revising the verbiage in main requirements R1, R2, and R3 that states "... who have demonstrated minimum competency in the areas listed to obtain and maintain ...". This statement could be misleading as it may imply that an operator must first demonstrate the competency and then obtain a certificate (i.e two different actions). However, the operator actually demonstrates his competency BY taking the NERC examination which allows the operator to obtain the certificate. We suggest slight rewording of the phrase as follows: "... who have</p>

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 4 Comment
		demonstrated minimum competency in the areas listed by obtaining and maintaining ..."
Response:		
Duke Energy	No	We believe that this requirement should be reworded to clarify that only System Operators who fill real-time operating positions and have responsibility for control of the Bulk Electric System must be certified. Also, the way the requirement is currently written, an auditor might erroneously conclude that some demonstrated minimum competency in the listed areas is required, beyond the competency demonstrated by obtaining and maintaining one of the listed valid NERC certificates. Suggested rewording:"Each Transmission Operator shall staff its real-time operating positions with System Operators responsible for control of the Bulk Electric System, who have demonstrated minimum competency in the areas listed by obtaining and maintaining one of the following valid NERC certificates:"
Response:		
Bonneville Power Administration	Yes	
City of Tallahassee (TAL)	Yes	
Gainesville Regional Utilities	Yes	
PacifiCorp	Yes	
South Carolina Electric and Gas	Yes	
Southern Company Transmission	Yes	
Brookfield Renewable Power Inc	Yes	I believe our internal testing is enough for our small transmission system.
Response:		

5. Requirement R3 of the draft standard reads:

R3. Each Balancing Authority shall staff its real-time operating positions with System Operators who have demonstrated minimum competency in the areas listed to obtain and maintain a one of the following valid NERC certificate.

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"

Do you agree with Requirement R3 as written for this standard? If not, please explain in the comment area.

Summary Consideration:

Organization	Yes or No	Question 5 Comment
IPCo	No	area of competencies should not be part of this standard
Response:		
Hydro-Québec TransEnergie (HQT)	No	As the Standard is currently drafted, there appears to be no distinction among personnel in a control room that may be performing the Balancing Authority functions and other functions. For example, there may be

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 5 Comment
		<p>multiple desks in one control room and, based on responsibilities and duties, they may not all need to be staffed with BA certified personnel. This is clearer in the Measures Section, and also in the existing Standard which reads "Positions that have the primary responsibility, either directly or through communications with others, for the real-time operation of the interconnected Bulk Electric System." We believe the "responsibility for real-time operation" phrase is the key to any certification Standard. The real-time operating positions need to be staffed with qualified (certified) System Operators requires definition. There are Transmission Owners that have other real-time operating and supervisory positions in the control room that support BES operations, but not necessarily System Operator functions. Suggest tying the requirements to decision making authority. "Minimum competency" must be defined, and how it relates to continuing education. Requirement R3, item 3.1 Balancing Authority Areas of Competency reflects the areas on the NERC Reliability Operator, Balancing, Interchange and Transmission Operator, and Balancing and Interchange Operator Certification Exams. There does not appear to be a connection to the Continuing Education Program. The Continuing Education Program defines the continuing education hours needed for the different certifications. PER-002 and to be approved PER-005 require 32 Hours of Emergency Operations training. Nowhere does it break down the competencies to those identified on the NERC Reliability Operator Certification Exam. Additionally, the areas of the NERC Certification Exam changed in 2007. Prior to 2007, there were only 4 areas (Emergency Operations, Guides and Procedures, System Reliability, and Transmission Operations). It is not clear how the difference in the NERC Certification Exams taken by those prior to 2007 and demonstration of Competencies will be addressed since the exam coverage areas are not the same. What is the difference between these certificates? "Balancing, Interchange and Transmission Operator" and "Balancing and Interchange Operator"</p>
Response:		
ISO New England Inc.	No	<p>As the Standard is currently drafted, there appears to be no distinction among personnel in a control room that may be performing the Balancing and other functions. For example, there may be multiple desks in one control room and, based on responsibilities and duties, they may not all need to be staffed with BA certified personnel. This is more clear in the Measures section and indeed is more clear in the existing Standard, that reads, "Positions that have the primary responsibility, either directly or through communications with others, for the real-time operation of the interconnected Bulk Electric System." We believe the "responsibility for real-time operation" phrase is key to any certification Standard.</p>
Response:		
Northeast Power Coordinating	No	<p>As the Standard is currently drafted, there appears to be no distinction among personnel in a control room that may be performing the Balancing Authority and other functions. For example, there may be multiple</p>

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 5 Comment
Council		<p>desks in one control room and, based on responsibilities and duties, they may not all need to be staffed with BA certified personnel. This is clearer in the Measures Section, and also in the existing Standard which reads “Positions that have the primary responsibility, either directly or through communications with others, for the real-time operation of the interconnected Bulk Electric System.” We believe the “responsibility for real-time operation” phrase is the key to any certification Standard. The real-time operating positions need to be staffed with qualified (certified) System Operators requires definition. There are Transmission Owners that have other real-time operating and supervisory positions in the control room that support BES operations, but not necessarily System Operator functions. Suggest tying the requirements to decision making authority. “Minimum competency” must be defined, and how it relates to continuing education. The party responsible for administering and tracking continuing education must be identified. Would the NERC SOCCED database be the proper location for certification administration record keeping? Requirement R3, sub-requirement 3.1 Balancing Authority Areas of Competency reflects the areas on the NERC Reliability Operator, Balancing, Interchange and Transmission Operator, and Balancing and Interchange Operator Certification Exams. There does not appear to be a connection to the Continuing Education Program. The Continuing Education Program defines the continuing education hours needed for the different certifications. PER-002 and to be approved PER-005 require 32 Hours of Emergency Operations training. Nowhere does it break down the competencies to those identified on the NERC Reliability Operator Certification Exam. Additionally, the areas of the NERC Certification Exam changed in 2007. Prior to 2007, there were only 4 areas (Emergency Operations, Guides and Procedures, System Reliability, and Transmission Operations). It is not clear how the difference in the NERC Certification Exams taken by those prior to 2007 and demonstration of Competencies will be addressed since the exam coverage areas are not the same.</p>
Response:		
City of Tallahassee (TAL)	No	BA's should have knowledge of Voltage and Reactive Control.
Response:		
Nebraska Public Power District	No	<p>Concerning this Requirement, NPPD has the following concerns and request that the requirement is rewritten to read: R3. “Each Balancing Authority shall staff its real-time operating positions responsible for the control of the Bulk Electric System with System Operators that have one of the following valid NERC certificates which contain competencies as defined by the NERC System Operator Certification Program. Trainees may perform critical tasks only under the direct, continuous supervision and observation of the NERC certified individual filling the required position. 3.1 Certificates Reliability Operator Balancing, Interchange and Transmission Operator Balancing and Interchange Operator” NPPD believes this recommended change to the proposed standard is equally efficient and effective as the recommendations outlined in FERC Order 693 for the</p>

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 5 Comment
		<p>following reasons.1. The Purpose of this Standard is to ensure System Operators performing reliability-related task have demonstrated competency through a Certification Process. In other words, Real Time System Operators possess a valid NERC Certificate. This has been a recommendation in the 14 August 2003 Blackout report and the Load Loss event in the State of Florida on 26 February 2008. NPPD agrees that System Operators need to be NERC Certified. 2. The statement of “demonstrated minimum competency” will and has lead to confusion and allows for interpretation since this is not defined and does not have an established basis. This is an unclear statement and NPPD recommends that it be deleted.3. The use of the word “obtain” is not a registered entity responsibility. The NERC System Operator Certification Program has the responsibility of ensuring that the competencies are demonstrated in order for a person to “obtain” a valid NERC Operator certificate, not the individual registered entity. The NERC System Operator Certification Program has processes in place for ensuring that competencies are current. It is much easier for the NERC System Operator Certification Program to update a NERC test competency than to update a NERC Standard.4. The use of the word “maintain” crosses over into the well established NERC’s SOCCED program of Continuing Education Hours (CEH) for maintaining of a valid NERC Certificate. Currently the NERC SOCCED program has three areas of obtaining CEHs, Continuing Education hours, NERC Standard hours, and Simulation hours. Before any hour of credit can be awarded to a NERC Certified System Operator, there is a rigorous Individual Learning Activity (ILA) that must be approved by NERC. It is apparent that the proposed competencies within this Standard are fulfilled by the NERC SOCCED education program. 5. Understand that Competencies are important for the basis of a training program, but the posting of these competencies within this standard go against the Systematic Approach to Training (SAT) as described in BOT approved PER-005-1. The SAT process is a detailed task analysis to ensure that all competencies are trained to a minimum level per function of the System Operator. The requirement must also align with the purpose statement. NPPD recommends adding the phrase “responsible for the control of the Bulk Electric System” after “real-time operating positions” to better align with the purpose of the standard. “Real-time operating positions” is not a clear and concise term and leads to ambiguity regarding which positions are required to be certified. The proposed standard has excluded language that permits trainees to work under the direction of a NERC Certified System Operator and NPPD would recommend that language be included in the standard that clarifies that trainees may work under the direct and continuous supervision of a NERC Certified individual.</p>
Response:		
NERC Standards Review Subcommittee	No	Concerning this Requirement, the MRO NSRS has the following concerns and request that the requirement is rewritten to read:R3. “Each Balancing Authority shall staff its real-time operating positions with System Operators that have obtained one of the following valid NERC certificates which contain competencies as defined by the NERC System Operator Certification Program.3.2 Certificates o Reliability Operator o

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 5 Comment
		<p>Balancing, Interchange and Transmission Operator o Balancing and Interchange OperatorThe MRO NSRS believes this recommended change to the proposed standard is equally efficient and effective as the recommendations outlined in FERC Order 693 for the following reasons.1. The purpose of this standard is to ensure System Operators performing reliability-related task have demonstrated competency through a Certification Process. In other words, Real-time System Operators possess a valid NERC Certificate. This has been a recommendation in the 14 August 2003 Blackout report and the Load Loss event in the State of Florida on 26 February 2008. This subcommittee agrees that System Operators need to be NERC certified. 2. The statement of “demonstrated minimum competency” will and has lead to confusion and allows for interpretation since this is not defined and does not have an established basis. This is an unclear statement and we recommend that it be deleted.3. The use of the word “obtain” is not a registered entity responsibility. The NERC System Operator Certification Program has the responsibility of ensuring that the competencies are demonstrated in order for a person to “obtain” a valid NERC operator certificate, not the individual registered entity. The NERC System Operator Certification Program has processes in place for ensuring that competencies are current. It is much easier for the NERC System Operator Certification Program to update a NERC competency test then to update a NERC Standard.4. The use of the word “maintain” crosses over into the well established NERC’s SOCCED program of Continuing Education Hours (CEH) for maintaining of a valid NERC certificate. Currently, the NERC SOCCED program has three areas of obtaining CEHs, continuing education hours, NERC standard hours, and simulation hours. Before any hour of credit can be awarded to a NERC Certified System Operator, there is a rigorous Individual Learning Activity (ILA) that must be approved by NERC. It is apparent that the proposed competencies within this standard are fulfilled by the NERC SOCCED education program. 5. We understand that competencies are important for the basis of a training program, but the posting of these competencies within this standard go against the Systematic Approach to Training (SAT) as described in the BOT approved PER-005-1. The SAT process is a detailed task analysis to ensure that all competencies are trained to a minimum level per function of the System Operator.</p>
<p>Response:</p>		
<p>Platte River Power Authority Operations Group</p>	<p>No</p>	<p>Demonstration of minimum competency and maintaining certification for the Balancing Authority is covered under PER-005-1. The requirement should read: Each Transmission Operator shall staff its real-time operating positions with System Operators who have demonstrated minimum competency through the NERC system operator certification program in the areas listed to obtain one of the following valid NERC certificates.</p>
<p>Response:</p>		

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 5 Comment
ERCOT ISO	No	ERCOT ISO doesn't agree that competencies should be defined in the standard since they are already defined in the certification process.
Response:		
Entergy Services	No	For the reasons stated in question #3 above, we suggest R3 be changed to the following:"Each Balancing Authority shall staff its real-time operating positions with System Operators who have achieved the minimum level of knowledge required to obtain and maintain one of the following valid NERC certificates: o Reliability Operator o Balancing, Interchange and Transmission Operator o Balancing and Interchange Operator"
SERC Standards Review Group	No	For the reasons stated in question #3 above, we suggest R3 be changed to the following:"Each Balancing Authority shall staff its real-time operating positions with System Operators who have achieved the minimum level of knowledge required to obtain and maintain one of the following valid NERC certificates: o Reliability Operator o Balancing, Interchange and Transmission Operator o Balancing and Interchange Operator"
Response:		
Georgia System Operations Corporation	No	Instead of listing the areas of competency why not refer to the System Operator Certification program. The statement below may be better wording.Each Transmission Operator shall staff its real-time operating positions with system operators who have met the minimum knowledge requirements of the System Operator Certification program to obtain and maintain one of the following valid NERC Certificates:1. Reliability Operator2. Balancing, Interchange, and Transmission Operator3. Balancing and Interchange Operator4. Transmission Operator
Response:		
US Bureau of Reclamation	No	It is not clear why the certificates include those for Reliability Operator, or Balancing, Interchange and Transmission Operator. The Standard also does not specifically reference the manual (System Operator Certification Program Manual-Final May 2006) upon which the certifications are based. The standard should be unambiguous with respect to how the certification is to be achieved. It will be difficult to track the compliance if the Manual is changed. Since certification is now tied to the manual through this requirement, the manual processes defined in the manual become a defacto requirement and subject to the standards approval process. The examination outline should also be included.

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 5 Comment
Response:		
Long Island Power Authority	No	LIPA suggests clarifying the term "real-time operating positions". It is our opinion that not all real time operating personnel are responsible for control of the Bulk Electric System. We also do not agree that the Registered Entity should be required to provide evidence that the System Operator was able to obtain a NERC certificate. NERC is responsible for the validity of its certification program. The requirement should relate to possessing a valid certificate. We suggest alternative phrasing: "Each Balancing Authority shall staff its real-time operating positions responsible for the control of the BES with System Operators who possess one of the following valid and current NERC Certificates:"
Response:		
E.ON U.S. LLC	No	Operators must hold one of the listed NERC certificates. Thus, adding "Areas of Competency" in the requirement is redundant and only confuses what is needed for compliance. If "demonstration of minimum competency" is different from the NERC certification process then criteria for demonstrating such competencies need to be set forth in R3. Because each system is unique E.ON U.S. does not believe ongoing minimum competency criteria beyond certification lends itself to a continent-wide standard with objectively determined measures. E.ON U.S. suggests the wording of R3 be revised to: Each Balancing Authority shall staff its real-time operating positions with System Operators who hold a valid NERC certificate listed in R3.2.
Response:		
American Electric Power (AEP)	No	Please reference related comments stated in question #1. The existing version 0 language is consistent with our recommendation that the minimum competency reference should be removed from the PER-003-1 Standard and, more appropriately, be identified in the System Operator Certification Program Manual, and in PER-002 and -005 standards. R3 should merely state that each registered applicable Balancing Authority (BA) entity shall staff its real-time operating positions with an operator who holds and maintains a valid Balancing and Interchange Operator, Balancing, Interchange and Transmission Operator or Reliability Operator certification credential. AEP does believe that language from Version 0 (Measure M1) and its sub-measures should be maintained by establishing a sub-requirement or notation in R1 to allow operators without a valid applicable NERC certification credential, while in training or during an emergency, to perform reliability related tasks under the direct, continuous supervision and observation of a NERC-certified individual filling the position.

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 5 Comment
Response:		
American Transmission Company	No	Please see are specific comments in question 4. Proposed Modification: Each BA shall staff its real-time operating positions with System Operators that have a valid NERC Reliability Operator certificate. Reliability Operator Balancing, Interchange and Transmission Operator Balancing and Interchange OperatorATC suggest that the list of minimum competency be deleted.
Response:		
Public Service Enterprise Group Inc. Companies	No	Please see response to question 3 with respect to the need to define System Operations.
Response:		
NIPSCO	No	R3 should be replaced by “Each Balancing Authority Operator shall staff its real-time operating positions with System Operators who have one of the following valid NERC certificates:” and leave the contents of 3.2. (listing these certificates is a nice addition to the standard) Then the certificates and certification process should be defined in the Glossary of Terms or described within the standard.
Response:		
Independent Electricity System Operator	No	Same comments as in question #4.Suggested alternative wording of R3:R3. Each Balancing Authority shall staff its real-time operating positions with System Operators who have obtained and maintain a valid NERC certificate through the NERC Certification Process. The Balancing and Interchange Operator certification exam shall have content that ensures the System Operator has knowledge in the following areas:3.1 Areas of Knowledge 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 Coordination3.2 Valid Certificates o Reliability Operator o Balancing, Interchange and Transmission Operator o Balancing and Interchange Operator
Response:		
ISO RTO Council Standards Review Committee	No	The competencies should be addressed in the development of the certification exam and NOT in this standard. This standard should simply require the operators to obtain the requisite certification.As stated in the response to Question #1, we believe “competency” extends beyond existing NERC examinations. Basing R1 on NERC Certification only demonstrates a level of knowledge, not competency.As the Standard is

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 5 Comment
		currently drafted, there appears to be no distinction among personnel in a control room that may be performing the Balancing and other functions. For example, there may be multiple desks in one control room and, based on responsibilities and duties, they may not all need to be staffed with BA certified personnel. This is more clear in the Measures section and indeed is more clear in the existing Standard, that reads, "Positions that have the primary responsibility, either directly or through communications with others, for the real-time operation of the interconnected Bulk Electric System." We believe the "responsibility for real-time operation" phrase is key to any certification Standard.
Response:		
Pepco Holdings, Inc - Affiliates	No	The language in the Requirement doesn't match the language in the Measure. The sentence in R3 should read "...by obtaining and maintaining one of the following valid NERC certificates." Not "to obtain and maintain."
Response:		
Xcel Energy	No	The listing of the competencies is related to the entity (ERO) administering the certification process and do not belong in this standard. Consideration should be given to establishing a standard for the ERO outlining the minimum competencies required to be addressed in the certification program. Balancing Authority This requirement should only address the minimum level of certification required for the Reliability Coordinator. For simplicity, all of the minimum certification requirements for each operator could be condensed into a table.
Response:		
Manitoba Hydro	No	The measures do not match the purpose and requirements. In both the purpose statement and requirements "competency" is mentioned, yet there is no measures in place for this. NERC certification alone does not guarantee competency. Our definition for competency is it encompasses a combination of knowledge, skills, and behavior to perform a specific role. Yes there does not appear to be any linkage to the measures for skills and behaviors. This leaves it open for interpretation by auditors in the future and will end up being a potential hindrance to improving the competence of System Operating personnel across the industry.
Response:		
Alberta Electric System Operator	No	The minimum competency reference should be removed and the areas of competency deleted. The SDT

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 5 Comment
		<p>does not provide a definition of competencies, nor is there a reference in how one would prove someone is competent by taking and passing an exam. Remove the reference to maintaining the certificate and change to hold a valid certificate. Suggest the wording read "Each BA shall staff its real-time operating positions with System Operators who hold one of the following valid NERC Certificates: o Reliability Operator o Balancing, Interchange and Transmission Operator o Transmission Operator Add sub-requirement 3.1 as an exception to R3 to allow operators in training without a valid NERC Certificate as in the measures section of PER-003-0.</p>
Response:		
BCTC	No	<p>The minimum competency reference should be removed and the areas of competency deleted. Remove the reference to maintaining the certificate and change to hold a valid certificate. Suggest the wording read "Each BA shall staff its real-time operating positions with System Operators who hold a valid NERC RC Certification." Add sub-requirement 1.1 as an exception to R1 to allow operators in training without a valid NERC Certificate as in the measures section of PER-003-0.</p>
Response:		
NERC PCGC	No	<p>The minimum competency reference should be removed and the areas of competency deleted. Remove the reference to maintaining the certificate and change to hold a valid certificate. Suggested wording would read "Each BA shall staff its real-time operating positions with System Operators who hold a valid NERC BA Certificate. This certificate demonstrates competencies through the NERC certification process." Specific competencies do not need to be included in this standard. The certification process identifies specific competencies based on periodic job analysis. The development of competencies based on job analysis is a well established process as provided by National Organization for Competency Assurance (NOCA) and American National Standard Institute (ANSI) guidelines.</p>
Response:		
Pacific Gas and Electric Company	No	<p>The minimum competency reference should be removed and the areas of competency deleted. The SDT does not provide a definition of competencies, nor is there a reference in how one would prove someone is competent by taking and passing an exam. Remove the reference to maintaining the certificate and change to hold a valid certificate. Suggest the wording read "Each BA shall staff its real-time operating positions with System Operators who hold a valid NERC RC, TO or BA Certification." Add sub-requirement 1.1 as an exception to R1 to allow operators in training without a valid NERC Certificate as in the measures section of PER-003-0.</p>

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 5 Comment
WECC Operations Training Subcommittee	No	The minimum competency reference should be removed and the areas of competency deleted. The SDT does not provide a definition of competencies, nor is there a reference in how one would prove someone is competent by taking and passing an exam. Remove the reference to maintaining the certificate and change to hold a valid certificate. Suggest the wording read "Each BA shall staff its real-time operating positions with System Operators who hold a valid NERC RC, TO or BA Certification." Add sub-requirement 1.1 as an exception to R1 to allow operators in training without a valid NERC Certificate as in the measures section of PER-003-0.
Response:		
Consumers Energy Company	No	The role the individual has within the company may not be consistent with the registration of the company. For example, Consumers Energy is registered has a BA, however the role of Controllers may make TO certification more applicable in making them proficient at their job. The activity, not the company registration, should determine the appropriate certification. The extra verbiage under "Areas of Competency" is unnecessary. The Certification Process will determine what is demonstrated. The only thing the entity has control over is whether their operating staff is certified. Attempting to task each entity in defining the Certification requirements is unfair and not achievable. Leave the Certification Process writers to do the work of defining the Certification Process and the Operating entities worry about their staff being certified in accordance with that process.
Response:		
Midwest ISO Stakeholder Standards Collaborators	No	The standard as written requires minimum competency. "At least" needs to be added before minimum competency otherwise a strict reading would mean that exceeding minimum competency is not compliant. The requirement should be rewritten to: "Each Balancing Authority shall staff its real-time operating positions with System Operators who hold a current, valid NERC Reliability Operator; Balancing, Interchange and Transmission Operator; or Balancing and Interchange Operator certificate." As the requirement is currently written, one could read the requirement to mean that a minimum competency must be demonstrated separately from obtaining and maintaining a valid NERC Reliability Operator certificate or that minimum competency is demonstrated by obtaining and maintaining a valid NERC Reliability Operator certificate. We are assuming the latter is what is intended. The suggested wording more clearly conveys that latter meaning. While adding areas of competency addresses FERC directives, it does not add any value to the standard by furthering reliability. What is really needed is a standard that applies to the ERO on what the certification process must demonstrate and contain. These areas of competency in this standard do not compel the ERO to guarantee that their certification process ensures that a certified system operator meets

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 5 Comment
		these minimum competency levels.
Response:		
Transmission and Reliability (TRO), TVA	No	The standard as written requires minimum competency. Suggest “at least” needs to be added before minimum competency otherwise a strict reading would mean that exceeding minimum competency is not compliant.Recommend the requirement be rewritten to: “Each Balancing Authority shall staff its real-time operating positions with System Operators who hold a current, valid NERC Reliability Operator; Balancing, Interchange and Transmission Operator; or Balancing and Interchange Operator certificate.”While adding areas of competency addresses FERC directives, it does not add any value to the standard by furthering reliability. By including these competencies in the standard as sub-requirements it implies the entity is responsible for additional demonstration of competency beyond that of operator certification, which has been identified as the only measure. Recommend these be removed from the standard.
Response:		
FirstEnergy	No	We agree that certain minimum competencies are required for a System Operator to reliably perform reliability-related tasks that effect the Bulk Electric System. However, since NERC's System Operator Certification Program specifically tests for these competencies as listed in the proposed requirements, and then issues a NERC Certificate based on these competencies, we do not see a need to spell out the competencies in the wording of these requirements. The requirements of this standard should be just to obtain the applicable valid NERC certificate and the verbiage in 1.1, 2.1, and 3.1 is not required.If the SDT decides to not remove the verbiage regarding areas of competencies, we ask that the SDT consider revising the verbiage in main requirements R1, R2, and R3 that states "... who have demonstrated minimum competency in the areas listed to obtain and maintain ...". This statement could be misleading as it may imply that an operator must first demonstrate the competency and then obtain a certificate (i.e two different actions). However, the operator actually demonstrates his competency BY taking the NERC examination which allows the operator to obtain the certificate. We suggest slight rewording of the phrase as follows: "... who have demonstrated minimum competency in the areas listed by obtaining and maintaining ..."
Response:		
Duke Energy	No	We believe that this requirement should be reworded to clarify that only System Operators who fill real-time operating positions and have responsibility for control of the Bulk Electric System must be certified. Also, the way the requirement is currently written, an auditor might erroneously conclude that some demonstrated

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 5 Comment
		minimum competency in the listed areas is required, beyond the competency demonstrated by obtaining and maintaining one of the listed valid NERC certificates. Suggested rewording: "Each Balancing Authority shall staff its real-time operating positions with System Operators responsible for control of the Bulk Electric System, who have demonstrated minimum competency in the areas listed by obtaining and maintaining one of the following valid NERC certificates:"
Response:		
Bonneville Power Administration	Yes	
Brookfield Renewable Power Inc	Yes	
Gainesville Regional Utilities	Yes	
PacifiCorp	Yes	
South Carolina Electric and Gas	Yes	
Southern Company Transmission	Yes	

6. Do you agree with the Measure for the requirements in the standard? If not, please explain in the comment area.

Summary Consideration:

Organization	Yes or No	Question 6 Comment
E.ON U.S. LLC		
NIPSCO		No comment at this time
NERC PCGC		No opinion
Manitoba Hydro	No	: The measures do not match the purpose and requirements. In both the purpose statement and requirements “competency” is mentioned, yet there is no measures in place for this. NERC certification alone does not guarantee competency. Our definition for competency is it encompasses a combination of knowledge, skills, and behavior to perform a specific role. Yes there does not appear to be any linkage to the measures for skills and behaviors. This leaves it open for interpretation by auditors in the future and will end up being a potential hindrance to improving the competence of System Operating personnel across the industry. If the intent to ensure Operating personnel has the proper certification then this is all that should be in this standard and no mention of competency.
Response:		
Xcel Energy	No	A copy of an operator's NERC certificate is not strong evidence of certification and leads organizations to keep track of vitrually worthless pieces of paper or files. Is there something (seal, hologram, mag strip) on the certificate itself that would indicate its authenticity? A more robust method is to verify the individual has an active certitifcate as listed in the NERC database.In general, the measures should not limit the methods for demonstrating compliance to those methods listed. It should indicate that other methods may be acceptable.
Response:		
BCTC	No	Add measures section from PER-003-0 regarding when in transit to backup center.

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 6 Comment
Response:		
American Transmission Company	No	ATC agrees with the measure as written but believe that the requirements and purpose statement need to be modified to match. See our comments to Questions 1, 3, 4 and 5
Response:		
Hydro-Québec TransÉnergie (HQT)	No	Compliance determination, assessment, audits, etc. are to be completed against meeting the Requirements of the Standard. The Requirements could be clarified by including wording comparable (or identical) to the requirement R1.1 in the existing Version 0 Standard ...”Positions that have the primary responsibility, either directly or through communications with others, for the real-time operation of the interconnected Bulk Electric System.” This is one instance where we believe Version 0, as currently written, is clearer and less ambiguous than the current draft.A copy of each of the real-time operating personnel’s NERC certification is not needed. The information is readily available on-line within the NERC SOCCED database.The measures focus on the list of real time operating positions, the list of NERC Certified Operators, copies of the NERC Certificates and work schedules that show that only NERC Certified personnel were staffing the positions. However, there is no mention of maintenance of certifications (i.e. continuing education hours to maintain certification or emergency operations hours required by PER-002 or PER-005).The measures need to clearly state that they only apply to those operators who have primary responsibility, either directly or through communications with others, for the real-time operation of the interconnected Bulk Electric System.
Response:		
Northeast Power Coordinating Council	No	Compliance determination, assessment, audits, etc. are to be completed against meeting the Requirements of the Standard. The Requirements could be clarified by including wording comparable (or identical) to the Requirement 1.1 in the existing Version 0 Standard ...”Positions that have the primary responsibility, either directly or through communications with others, for the real-time operation of the interconnected Bulk Electric System.” This is one instance where we believe Version 0, as currently written, is clearer and less ambiguous than the current draft.A copy of each of the real-time operating personnel’s NERC certification is not needed. The information is readily available on-line within the NERC SOCCED database.The measures focus on the list of real time operating positions, the list of NERC Certified Operators, copies of the NERC Certificates and work schedules that show that only NERC Certified personnel were staffing the positions. However, there is no mention of maintenance of certifications (i.e. continuing education hours to maintain certification or emergency operations hours required by PER-002 or PER-005)The measures need to clearly state that they only apply to those operators who have primary responsibility.

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 6 Comment
ERCOT ISO	No	ERCOT ISO suggests the measures be revised to say “Each Reliability Coordinator, Transmission Operator and Balancing Authority shall show that it staffed its real-time operating positions with System Operators that have an appropriate, valid NERC certificate. Evidence may include:”
Response:		
Long Island Power Authority	No	LIPA points out that similar to our prior comment the measurement does not speak to the phrase of "demonstrating minimum competencies required to obtain and maintain a valid NERC Certificate", rather only the possession of a valid NERC certificate is indicated. Since NERC Auditors utilize the Standard's requirement and not the Standard's measurement as the benchmark for compliance, LIPA suggests that the measurement be utilized to refine the phrasing of the requirement. Similar to the previous comment, the measurement should be specific to those real time operating positions responsible for the control of the BES. We suggest the following: Each Reliability Coordinator, Transmission Operator and Balancing Authority shall have the following evidence to show that it staffed its real-time operating positions responsible for the control of the BES with System Operators that have an appropriate, valid NERC certificate".
Response:		
Duke Energy	No	Measure M1.3 should be revised to only require a list of NERC-certified personnel with their NERC certification numbers and expiration dates. The actual certificates reside with NERC.
Response:		
FirstEnergy	No	Regarding M1.3, the entity may not specifically have copies of every operator's certification. We feel that all that is necessary is to show evidence of valid certificate numbers.
Response:		
Entergy Services	No	The general trend for new and updated standards has been that each requirement has its own measure. These four requirements should have separate measures for consistency. The evidence list in the measure proposes that it is the only evidence that could be presented. Most measures are written such as the list of evidence is one way to demonstrate compliance but that there may be others not recognized here. We suggest the measures be revised to reflect this by changing “shall have the following evidence to show that it staffed its real-time operating positions with System Operators that have an appropriate, valid NERC certificate:” to “shall have evidence to show that it staffed its real-time operating positions with System

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 6 Comment
		Operators that have an appropriate, valid NERC certificate that may include:".
Response:		
Midwest ISO Stakeholder Standards Collaborators	No	The general trend for new and updated standards has been that each requirement has its own measure. These four requirements should have separate measures for consistency. The evidence list in the measure proposes that it is the only evidence that could be presented. Most measures are written such as the list of evidence is one way to demonstrate compliance but that there may be others not recognized here. We suggest the measures be revised to reflect this by changing "shall have the following evidence to show that it staffed its real-time operating positions with System Operators that have an appropriate, valid NERC certificate:" to "shall have evidence to show that it staffed its real-time operating positions with System Operators that have an appropriate, valid NERC certificate that may include:".
Response:		
IPCo	No	The measure should be what is required to show compliance.
Response:		
Alberta Electric System Operator	No	The measurements do not address competencies as stated in the requirements. However, this in not an issue if the list of competencies is removed from the standard. There is also no allowance for emergencies, we suggest a measure as stated in PER-003-0 M1.2 "During a real-time operating emergency, the time when control is transferred from a primary control center to a backup control center shall not be included in the calculation of non-compliance. This time shall be limited to no more than four hours." Add measures section from PER-003-0 regarding when in transit to backup center.
Response:		
Pacific Gas and Electric Company	No	The measurements do not address competencies as stated in the requirements. There is also no allowance for emergencies, we suggest a measure as stated in PER-003-0 M1.2 "During a real-time operating emergency, the time when control is transferred from a primary control center to a backup control center shall not be included in the calculation of non-compliance. This time shall be limited to no more than four hours." Add measures section from PER-003-0 regarding when in transit to backup center.
Response:		

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 6 Comment
WECC Operations Training Subcommittee	No	The measurements do not address competencies as stated in the requirements. There is also no allowance for emergencies, we suggest a measure as stated in PER-003-0 M1.2 "During a real-time operating emergency, the time when control is transferred from a primary control center to a backup control center shall not be included in the calculation of non-compliance. This time shall be limited to no more than four hours." Add measures section from PER-003-0 regarding when in transit to backup center.
Response:		
ISO RTO Council Standards Review Committee	No	The Measures more accurately depict the expectations of the Standard than its Requirements. Unfortunately, compliance determination, assessment, audits, etc. are to be completed against meeting the Requirements of the Standard. We believe the Requirements could be clarified by including wording comparable (or identical) to the Requirement 1.1 in the existing Version 0 Standard..."Positions that have the primary responsibility, either directly or through communications with others, for the real-time operation of the interconnected Bulk Electric System." This is one instance where we believe Version 0, as currently written, is more clear and unambiguous than the current draft. There are no measures for the sub-requirements of areas of competency. These should be removed from the requirement.
Response:		
Platte River Power Authority Operations Group	No	The NERC Glossary of Terms for System Operator includes Generator Operator which this standard is not applicable to. It should read:...with Reliability Coordinator, Transmission Operator and Balancing Authority system operators that have an appropriate, valid NERC certificate (R1, R2, R3):
Response:		
Pepco Holdings, Inc - Affiliates	No	The wording in the Measures paragraph should be changed to match the language in the requirements "... staffed its real-time operating positions with System Operators who have demonstrated the appropriate competencies by obtaining the appropriate valid NERC Certificate."
Response:		
Nebraska Public Power District	No	These measures will help the RC, BA, & TOP to be compliant but do not reflect what the requirement as currently written is requesting. These measures do support the proposed recommendation to rewrite R1, R2, and R3 that: Each (RC, BA, TOP) shall staff its real-time operating positions responsible for the control of the Bulk Electric System with System Operators that have one of the following valid NERC certificates which

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 6 Comment
		<p>contain competencies as defined by the NERC System Operator Certification Program. Trainees may perform critical tasks only under the direct, continuous supervision and observation of the NERC certified individual filling the required position. In addition, measures 1.1, 1.2 & 1.4 should include the phrase “responsible for the control of the Bulk Electric System” to modify the term real-time operating positions to better align with the purpose. The term “real-time operating positions” is unclear and ambiguous and not defined. There needs to be clarity on which positions fall under this standard.</p>
Response:		
<p>NERC Standards Review Subcommittee</p>	<p>No</p>	<p>These measures will help the RC, BA, & TOP to be compliant but do not reflect what the requirement as currently written is requesting. These measures do support the proposed recommendation to rewrite R1, R2, and R3 that: Each (RC, BA, TOP) shall staff its Real-time operating positions with System Operators that have obtained one of the following valid NERC certificates which contain competencies as defined by the NERC System Operator Certification Program.</p>
Response:		
<p>American Electric Power (AEP)</p>	<p>No</p>	<p>While AEP agrees with the measure and sub-measures that are identified in the revised standard, we are concerned with the loss of the content from Measure M1 of the last version. As previously described, AEP believes that the M! language should be maintained, but as a requirement rather than as a measure. Correspondingly, we suggest either the former measure be added as a sub-requirement or notation in requirements R1, R2, and R3, or the former measure be added as an additional requirement in the following format: R4. Each Transmission Operator, Balancing Authority, and Reliability Coordinator shall have NERC-certified operating personnel on shift in required positions at all times with the following exceptions: R4.1 While in training, an individual without the proper NERC certification credential may not independently fill a required operating position. Trainees may perform critical tasks only under the direct, continuous supervision and observation of the NERC certified individual filling the required position. R4.2 During a real-time operating emergency, the time when control is transferred from a primary control center to a backup control center shall not be included in the calculation of non-compliance. This time shall be limited to no more than four hours.</p>
Response:		
<p>Bonneville Power Administration</p>	<p>Yes</p>	

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 6 Comment
Brookfield Renewable Power Inc	Yes	
Consumers Energy Company	Yes	
Gainesville Regional Utilities	Yes	
Georgia System Operations Corporation	Yes	
Independent Electricity System Operator	Yes	
PacifiCorp	Yes	
Public Service Enterprise Group Inc. Companies	Yes	
SERC Standards Review Group	Yes	
Southern Company Transmission	Yes	
Transmission and Reliability (TRO), TVA	Yes	
US Bureau of Reclamation	Yes	
City of Tallahassee (TAL)	Yes	<p>However, What are the auditors going to look for me to prove? Are they going to ask me to prove that each certificate issued (or renewed)asked questions from the applicable competencies? This would be above the Measures as written, so how do we get Compliance to acknowledge this? This information will need to come from the Certification Process and that record keeping.</p>
<p>Response:</p>		

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 6 Comment
ISO New England Inc.	Yes	The Measures more accurately depict the expectations of the Standard than its Requirements. Unfortunately, compliance determination, assessment, audits, etc. are to be completed against meeting the Requirements of the Standard. We believe the Requirements could be clarified by including wording comparable (or identical) to the Requirement 1.1 in the existing Version 0 Standard..."Positions that have the primary responsibility, either directly or through communications with others, for the real-time operation of the interconnected Bulk Electric System." This is one instance where we believe Version 0, as currently written, is more clear and unambiguous than the current draft.
Response:		
South Carolina Electric and Gas	Yes	While we do agree with the Measure for the requirements of this standard, we do NOT agree with removal of the exceptions(M1.1 and M1.2) from the Measure in PER-003-0. These exceptions involve trainees(M1.1) and transferring control from a PCC to a BCC(M1.2).
Response:		

7. Do you agree with the Violation Risk Factors for each of the requirements in the standard? If not, please explain in the comment area.

Summary Consideration:

Organization	Yes or No	Question 7 Comment
Alberta Electric System Operator		
American Transmission Company		
Consumers Energy Company		
E.ON U.S. LLC		
ISO New England Inc.		
ISO RTO Council Standards Review Committee		
Public Service Enterprise Group Inc. Companies		
NIPSCO		No comment at this time.
NERC PCGC		No opinion
Southern Company Transmission		There is no VRF matrix in this standard.
NERC Standards Review Subcommittee	No	

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 7 Comment
ERCOT ISO	No	Failure to have a certified System Operator on a single shift does not necessarily lead directly to cascading outages, blackout, etc. A high Violation Risk Factor (VRF) presumes incorrectly that the System Operator hasn't been trained and that no other System Operators are involved in making decisions. ERCOT ISO recommends a low or medium VRF for each of the requirements.
Response:		
City of Tallahassee (TAL)	No	High VRF is too high. Failure to be certified in and of itself does not pose the threat to the BES. The ACTIONS, and the results of those actions, by the System Operator is the threat. Those threats are covered by other standards VRF's.
Response:		
Gainesville Regional Utilities	No	I disagree with the violation risk factors unless they are applied based on the affect of the Bulk Electric System , not aan individual system. In other wordsa 10,00 Mw system may have a higher vsl due to magnitude alone as compared to a 100 Mw system.
Response:		
Brookfield Renewable Power Inc	No	It does not consider a small transmission system inside a large system. Our system is basically a tap into HQ grid.
Response:		
Transmission and Reliability (TRO), TVA	No	It is important to have certified system operators. However, failure to have a certified system operator on a single shift does not present a high risk to the interconnection. Because it presents an indirect risk, we recommend a low or medium VRF for the requirements.
Response:		
Manitoba Hydro	No	It just seems too high as certification alone does not mean the system will be operated more reliably. It guarantees only a minimum of knowledge. Even using competency, if the measures don't match the requirements will not hit the target for improving reliability.

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 7 Comment
Response:		
BCTC	No	Not defined.
IPCo	No	Risk factors should include levels of non-compliance in current PER-003 in this standard
Response:		
Nebraska Public Power District	No	The Bulk Electric System will not necessarily fail if a non-certified System Operator is operating the system. Conversely there could be a cascading, uncontrolled separation and instability if a certified System Operator was on-shift. If other standards are followed, having certified personnel won't lead to a collapse of the Bulk Power System (we operated for years without certified operators). The Violation Risk Factor should be no higher than Medium.
Response:		
US Bureau of Reclamation	No	The lack of certification may not be the same as competency. Certification is not same as competency based on the current process for achieving certification. If the certification was tied to known failures to follow procedures, an argument could be made that a risk for that operator is higher. Otherwise, there is no imminent threat by the operator who failed to report on hour of training needed to keep certification current.
Response:		
Georgia System Operations Corporation	No	The violation risk factor should be set between low and medium but not high. An improper NERC certificate does not warrant a high risk to the BES if the operator has the correct knowledge but not the correct certificate.
Response:		
Platte River Power Authority Operations Group	No	The Violation Severity Levels are included in the draft of the standard, however, we weren't able to find the Violation Risk Factors.
Response:		

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 7 Comment
Midwest ISO Stakeholder Standards Collaborators	No	The VRFs confuse importance with risk. It is important to have certified system operators. However, failure to have a certified system operator on a single shift does not present a high risk to the interconnection. The definition of a high VRF requires that non-compliance would lead directly to a cascading outages, blackout, etc. A high risk factor presumes that the operator hasn't been trained. There are other requirements that ensure the system operator will be trained. Secondly, an event will actually have to occur on the system to have an impact. If no event occurs, no cascading outages, blackout, etc can occur. Thus, two other dependencies must occur for cascading outages, blackout, etc to occur. When there are other dependencies, these requirements' risk hardly meets the direct requirement in the definition of high risk. Because it presents an indirect risk, we recommend a medium VRF for the requirements.
Xcel Energy	No	The VRFs confuse importance with risk. It is important to have certified system operators. However, failure to have a certified system operator on a single shift does not present a high risk to the interconnection. The definition of a high VRF requires that non-compliance would lead directly to a cascading outages, blackout, etc. A high risk factor presumes that the operator hasn't been trained. There are other requirements that ensure the system operator will be trained. Secondly, an event will actually have to occur on the system to have an impact. If no event occurs, no cascading outages, blackout, etc can occur. Thus, two other dependencies must occur for cascading outages, blackout, etc to occur. When there are other dependencies, these requirements' risk hardly meets the direct requirement in the definition of high risk. Because it presents an indirect risk, we recommend a medium VRF for the requirements.
Response:		
Entergy Services	No	This group does not feel that meeting the minimum knowledge level required to obtain/maintain certification should have associated with it a HIGH risk factor. This draft standard is concerned with obtaining and maintaining a NERC certificate - that is, passing an exam and accumulating continuing education hours. Since certification alone does not ensure competency in performing reliability-related tasks, we feel the VRFs for R1, R2 & R3 should be shown as LOW.
Response:		
SERC Standards Review Group	No	This group does not feel that meeting the minimum knowledge level required to obtain/maintain certification should have associated with it a HIGH risk factor. This draft standard is concerned with obtaining and maintaining a NERC certificate - that is, passing an exam and accumulating continuing education hours. Since certification alone does not ensure competency in performing reliability-related tasks, we feel the VRFs

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 7 Comment
		for R1, R2 & R3 should be shown as LOW.
Response:		
American Electric Power (AEP)	Yes	
Bonneville Power Administration	Yes	
Duke Energy	Yes	
FirstEnergy	Yes	
Hydro-Québec TransEnergie (HQT)	Yes	
Independent Electricity System Operator	Yes	
Long Island Power Authority	Yes	
Northeast Power Coordinating Council	Yes	
Pacific Gas and Electric Company	Yes	
PacifiCorp	Yes	
Pepco Holdings, Inc - Affiliates	Yes	
South Carolina Electric and Gas	Yes	
WECC Operations Training Subcommittee	Yes	

8. Do you agree with the Violation Severity Levels for each of the requirements in the standard? If not, please explain in the comment area.

Summary Consideration:

Organization	Yes or No	Question 8 Comment
Alberta Electric System Operator		
American Transmission Company		
Consumers Energy Company		
ISO New England Inc.		
ISO RTO Council Standards Review Committee		
Public Service Enterprise Group Inc. Companies		
NERC PCGC		No opinion
Gainesville Regional Utilities	No	
NERC Standards Review Subcommittee	No	
American Electric Power (AEP)	No	AEP believes that the functional model and Standard hierarchy, with the Reliability Coordinator being the ultimate authority issuing directives, may suggest different violation severity levels. Although it is definitely understood that each registered applicable entity could have a significant impact in the reliability of the BES, there are inherently differently levels of potential impact related to the specific reliability related job tasks.

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 8 Comment
		Therefore, the SDT should reconsider the VSLs based on these differences.
Response:		
Platte River Power Authority Operations Group	No	Although we understand that FERC is most likely not in agreement, it would seem appropriate to have criteria for Lower, Medium and High Severity Levels opposed to an all or nothing approach.
Response:		
Pacific Gas and Electric Company	No	Comments: The VSL should take into consideration various levels of non-compliance, such as those in PER-003-0. PER-003 listed four levels of non-compliance in which the entity did not meet the requirement for a total time between 0-72 hours during a one month period. Certain circumstance may warrant situations in which an entity may not be able to comply with the staffing requirements.
Response:		
ERCOT ISO	No	ERCOT ISO thinks that Violation Severity Levels (VSLs) should be based on the number of System Operators that don't have the proper NERC certification.
Response:		
Hydro-Québec TransEnergie (HQT)	No	Everything is a "Severe." While we agree with the principle of having a NERC certified operator present at all times, there must be consideration for the occurrences of emergencies, medical or family or otherwise. If a System Operator has to leave, it may take time for a qualified relief person to replace that individual.
Northeast Power Coordinating Council	No	Everything is a "Severe." While we agree with the principle of having a NERC certified operator present at all times, there must be consideration for the occurrences of emergencies, medical or family or otherwise. If a System Operator has to leave, it may take time for a qualified relief person to replace that individual.
Response:		
SERC Standards Review Group	No	For the reasons stated in question # 7 above, a violation of these requirements should not be considered severe. However, we are aware of the drafting team's constraint to assign only a Severe VSL to standard requirements that are binary in nature.

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 8 Comment
Response:		
Entergy Services	No	For the reasons stated in question # 7 above, if a violation is found, the VSL should be shown as LOWER VSL to MEDIUM VSL.
Response:		
Midwest ISO Stakeholder Standards Collaborators	No	In Paragraph 27 of the June 19, 2008 Order on Violation Severity Levels Proposed by the Electric Reliability Organization, the Commission expressed “as a general rule, gradated Violation Severity Levels, wherever possible , would be preferable to binary Violation Severity Levels”. Based on the Commission’s preference, we suggest VSLs could be based on the number of System Operators that don’t have the proper certification. Four levels should be created.
Response:		
Manitoba Hydro	No	It just seems too high as certification alone does not mean the system will be operated more reliably. It guarantees only a minimum of knowledge. Even using competency, if the measures don’t match the requirements will not hit the target for improving reliability.
Response:		
BCTC	No	RC should have a higher severity level than TO or BA.
Response:		
Transmission and Reliability (TRO), TVA	No	Recommend a gradation of severity levels be developed. A severe VSL for all violations does not appropriately reflect the degree by which an entity has failed to meet the requirement.
Response:		
US Bureau of Reclamation	No	The lack of certification may not be the same as competency. As such the severity level should be consistent with those associated with documentation.
Response:		

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 8 Comment
Georgia System Operations Corporation	No	The violation severity levels should be high if the operator does not have a NERC certificate at all. A medium violation severity level should be set if the operator has an improper NERC certificate.
Response:		
WECC Operations Training Subcommittee	No	The VSL should take into consideration various levels of non-compliance, such as those in PER-003-0. PER-003 listed four levels of non-compliance in which the entity did not meet the requirement for a total time between 0-72 hours during a one month period. Certain circumstance may warrant situations in which an entity may not be able to comply with the staffing requirements.
Response:		
Xcel Energy	No	The VSLs appear to be incomplete.
Response:		
E.ON U.S. LLC	No	The VSLs assume all RT operating positions are staffed at all times - this may not always be true. For example, during off-peak periods RT operating positions may be combined and covered by fewer individuals. The standard should not dictate that all potential RT operating positions need to be staffed at all times. The entity will determine adequate staffing levels with the standard requiring that such positions be staffed by certified personnel.
Response:		
Brookfield Renewable Power Inc	No	There is not time to have operators trained first.
Response:		
City of Tallahassee (TAL)	No	There is no caveat for the old "emergency clause" for transitioning to a Back Up Facility. The current Version 0 includes this in Measure M.1.2 "During a real-time operating emergency, the time when control is transferred from a primary control center to a backup control center shall not be included in the calculation of non-compliance. This time shall be limited to no more than four hours."
Response:		

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 8 Comment
Nebraska Public Power District	No	There should be differing severity levels based on the amount of time a non-certified operator worked unsupervised. Having a non-certified operator work one shift is much less severe than having all non-certified operators. The matrix should reflect the differing severity.
Response:		
IPCo	No	violation factors should include levels of non-compliance in current PER-003 in this standard
Response:		
Bonneville Power Administration	Yes	
Duke Energy	Yes	
FirstEnergy	Yes	
Independent Electricity System Operator	Yes	
Long Island Power Authority	Yes	
NIPSCO	Yes	
PacifiCorp	Yes	
Pepco Holdings, Inc - Affiliates	Yes	
South Carolina Electric and Gas	Yes	
Southern Company Transmission	Yes	

9. Do you agree with the proposed Implementation Plan for this standard? If not, please explain in the comment area.

Summary Consideration:

Organization	Yes or No	Question 9 Comment
Consumers Energy Company		
E.ON U.S. LLC		
ISO New England Inc.		
ISO RTO Council Standards Review Committee		
Midwest ISO Stakeholder Standards Collaborators		
Public Service Enterprise Group Inc. Companies		
Manitoba Hydro		As long as the comments for standard are reviewed and standard resubmitted for review.
Response:		
Platte River Power Authority Operations Group	No	Demonstration of minimum competency and maintaining certification for system operators is covered under PER-005-1 which has been approved by NERC and is awaiting regulatory approval. PER-005-1 has a 24 month implementation plan and we believe that without the suggested wording changes in questions 3, 4 and 5 the implementation of this standard should not take effect until PER-005-1 is effective.
Response:		

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 9 Comment
Hydro-Québec TransÉnergie (HQT)	No	If all control room operators need to be certified whatever their functions, the implementation plan needs to be at least 2 years to allow time to negotiate with unions, free up operators for the initial certification training and give them time to take and pass the test. The standard as written states in the VSL that all control room operators need to be NERC certified. It should be only those that are primarily responsible, either directly or through communications with others, for the real-time operation of the interconnected Bulk Electric System.(i.e. give directives).
Response:		
Northeast Power Coordinating Council	No	If all control room operators need to be certified, the implementation plan needs to be at least 2 years to allow time to negotiate with unions, free up operators for the initial certification training and give them time to take and pass the test. The standard as written states in the VSL that all control room operators need to be NERC certified. It should be only those that are primarily responsible (i.e. give directives).
Response:		
Brookfield Renewable Power Inc	No	It is too quick to implement plan.
Response:		
NERC PGC	No	PCGC feels it is unclear as to what the full ramifications this standard may have on the certification process. A full study will be needed if this standard does cause changes to the certification process, and therefore could drastically affect the implementation plan.
Response:		
Long Island Power Authority	No	The implementation Plan allows 6 to 9 months after approval for a Registered Entity to obtain certification for System Operators. LIPA is utilizing this comment to remind NERC to have the facilities to provide certification to those System Operators in a timely manner.
Response:		
Alberta Electric System Operator	Yes	

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 9 Comment
American Electric Power (AEP)	Yes	
BCTC	Yes	
Bonneville Power Administration	Yes	
City of Tallahassee (TAL)	Yes	
Duke Energy	Yes	
Entergy Services	Yes	
ERCOT ISO	Yes	
FirstEnergy	Yes	
Gainesville Regional Utilities	Yes	
Georgia System Operations Corporation	Yes	
Independent Electricity System Operator	Yes	
IPCo	Yes	
Nebraska Public Power District	Yes	
NERC Standards Review Subcommittee	Yes	
NIPSCO	Yes	

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 9 Comment
Pacific Gas and Electric Company	Yes	
PacifiCorp	Yes	
Pepco Holdings, Inc - Affiliates	Yes	
SERC Standards Review Group	Yes	
South Carolina Electric and Gas	Yes	
Southern Company Transmission	Yes	
Transmission and Reliability (TRO), TVA	Yes	
US Bureau of Reclamation	Yes	
WECC Operations Training Subcommittee	Yes	
Xcel Energy	Yes	
American Transmission Company	Yes	ATC does agree with the proposed effective date if the evidence to demonstrate compliance is limited to showing that our System Operators have a valid NERC Certificate.
Response:		

10. In In FERC Order 693 the Commission directed the ERO to consider “grandfathering” of system operators. The SDT has strongly considered grandfathering and does not feel that it should be allowed within this standard. The major factors that the SDT based its decision to not allow for grandfathering are as follows:

Do you agree with the proposed concept that “grandfathering” not be allowed? If not, please explain in the comment area.

Summary Consideration:

Organization	Yes or No	Question 10 Comment
Public Service Enterprise Group Inc. Companies		
South Carolina Electric and Gas	No	Grandfathering should be allowed under this standard. If an individual has been performing their job for years as a system operator, We don't believe taking a certification exam will make them any more competent than they were prior to the exam. We don't believe there will be any benefits in terms of reliability of the BES or knowledge level. Operators that have been performing a system operator job for years obviously have a "minimum" knowledge level and forcing them to take and pass an exam would provide little or no benefit. We would agree to phasing out the "grandfathering" over a period of years, however we feel that the funds needed for this training and certification can be better utilized elsewhere.
Response:		
Brookfield Renewable Power Inc	No	I believe the standard to which our operators were trained was to the same level as the HQ operation staff.
Response:		
E.ON U.S. LLC	No	If the proposed no “grandfathering” applies only to individuals pursuing initial certification then the approach seems appropriate. However, individuals seeking re-certification via the CEH process should not also be subject to overall/comprehensive certification exams. The re-certification process requires exams to earn

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 10 Comment
		CEH credits. This should suffice
Response:		
NIPSCO	No	We generally agree with sections B & D above. In A. we disagree with the last sentence: "Passing a certification examination is NERC's only available method to verify the minimum knowledge level of a System Operator". PER-005 requires that operators be trained in what they do. Through audits, spot checks and self certification compliance to this will be reviewed by the regions and NERC. In Section C. We disagree with the sentence: "Overall labor relations issues that arose due to the NERC System Operator Certification requirements have, for the most part, already been settled." This is still a major issue that has not yet been resolved. I think it's interesting to note that the word "competency" does not appear in the above items A-D however "knowledge" is used numerous times. Should "knowledge" be used in the standard in place of competency ?
Response:		
Alberta Electric System Operator	Yes	
American Electric Power (AEP)	Yes	
BCTC	Yes	
Bonneville Power Administration	Yes	
Consumers Energy Company	Yes	
Duke Energy	Yes	
Entergy Services	Yes	
ERCOT ISO	Yes	
FirstEnergy	Yes	

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 10 Comment
Georgia System Operations Corporation	Yes	
Independent Electricity System Operator	Yes	
IPCo	Yes	
Long Island Power Authority	Yes	
Manitoba Hydro	Yes	
Midwest ISO Stakeholder Standards Collaborators	Yes	
Nebraska Public Power District	Yes	
NERC PCGC	Yes	
Pacific Gas and Electric Company	Yes	
PacifiCorp	Yes	
Pepco Holdings, Inc - Affiliates	Yes	
Platte River Power Authority Operations Group	Yes	
SERC Standards Review Group	Yes	
Southern Company Transmission	Yes	

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 10 Comment
Transmission and Reliability (TRO), TVA	Yes	
US Bureau of Reclamation	Yes	
WECC Operations Training Subcommittee	Yes	
Xcel Energy	Yes	
Gainesville Regional Utilities	Yes	At this juncture I agree since to operate a system the certification that came about was "required" and all System Operators took the tests and received their certification in their respective areas. I beleve at the time some individuals could have been grandfathered in. Not anymore, due to no apparent reason.
Response:		
American Transmission Company	Yes	ATC agrees that grandfathering should not be allowed as a replacement for a valid NERC Certification.
Response:		
City of Tallahassee (TAL)	Yes	However, paragraph B is not entirely correct. When Version 0 standards were adopted, we had three senior operators retire after they were unsuccessful in completing NERC Certification.
Response:		
NERC Standards Review Subcommittee	Yes	The MRO NSRS agrees that grandfathering should not be allowed as a replacement for a valid NERC certification.
Response:		
Hydro-Québec TransEnergie (HQT)	Yes	The SDT's has decided on the proper disposition of "grandfathering". It is important for SDTs to take and obtain support for what they feel are the right ways of addressing an issue as it relates to reliability. After the SDT reviewed and balanced the "grandfathering" considerations, the SDT opted not to include those

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 10 Comment
		provisions in the draft standard, a decision we support. The same methodical and balanced approach should be used when addressing any FERC Orders.
Response:		
Northeast Power Coordinating Council	Yes	The SDT's has decided on the proper disposition of "grandfathering". It is important for SDTs to take and obtain support for what they feel are the right ways of addressing an issue. After the SDT reviewed and balanced the "grandfathering" considerations, the SDT opted not to include those provisions in the draft standard, a decision we support. The same methodical and balanced approach should be used when addressing FERC Orders.
Response:		
ISO New England Inc.	Yes	We applaud the SDT members for not feeling compelled to simply adopt FERC Order 693 comments and for proactively evaluating their impact on the Reliability of power system operations. We encourage other SDT to take the same approach.
Response:		
ISO RTO Council Standards Review Committee	Yes	We applaud the SDT members for not feeling compelled to simply adopt FERC Order 693 comments and for proactively evaluating their impact on the Reliability of power system operations. We encourage other SDT to take the same approach. We would like to comment on the Passing Rates - a better sample of data should have been obtained. This data reflects a 2% failure rate. Considering normal distribution, the data presented reflects either that statistical analysis was inadequate for the sample or the cutoff score for the exam may need to be changed.
Response:		

11. In FERC Order 693 the Commission directed the ERO to include the minimum competencies that must be demonstrated to become and remain a certified system operator. The SDT has identified topical areas for which minimum competency must be validated through the certification process.

Do you agree with the method the SDT has used to meet the FERC directive? If not, please explain in the comment area.

Summary Consideration:

Organization	Yes or No	Question 11 Comment
Public Service Enterprise Group Inc. Companies		
FirstEnergy	No	Although we agree that the SDT has done everything they can to meet the FERC directive, we do not agree that minimum competencies must be spelled out in the standard since obtaining a NERC Certificate already proves you demonstrate the minimum competencies. Please refer to our comments in Questions 3, 4, and 5.
Response:		
Gainesville Regional Utilities	No	I can't agree as to how specifically addressed competencies should be addressed. If a system operator can perform the necessary functions to keep s specific company reliable, how are these proposed competencies going to be investigated as to what depth of "competency? Who's decision will that be, The Entity, NERC, FERC, IEEE? Clarification may be in order
Response:		
American Electric Power (AEP)	No	In brief, while AEP fully supports the FERC directive to enhance the certification process to ensure demonstrated competency, AEP believes that the competencies be addressed in standards PER-002 for qualifications and PER-005 for system training requirements, and in the NERC System Operator Certification Program Manual.Please reference the comments provided in Question 1 for the basis for this belief.
Response:		

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 11 Comment
Nebraska Public Power District	No	<p>In FERC Order 693, dated 16 March 2007, the Commission approves Reliability Standard PER-003-0. In addition, pursuant to section 215(d)(5) of the FPA and Â§ 39.5(f) of our regulations, the Commission directs the ERO to develop a modification to PER-003-0 through the Reliability Standards development process that: (1) specifies the minimum competencies that must be demonstrated to become and remain a certified operator and (2) identifies the minimum competencies operating personnel must demonstrate to be certified.FERC has not stated that competencies must be a NERC Standard but have minimum competencies that must be demonstrated to become and maintain a certified operator. The NERC System Operator Certification Program has processes in place for ensuring that minimum competencies are current in order to obtain a NERC Certificate. The maintenance of minimum competencies are within the NERC SOCCED program. This will allow the NERC System Operator Certification Program adjust competencies as required to meet changing demands without the time needed to go through the standards development process.We feel the FERC directive is being met in the NERC System Operator Certification Program process and we ask the SDT to eliminate all references to competencies in this standard as proposed so to reduce confusion and redundancies.</p>
NERC Standards Review Subcommittee	No	<p>In FERC Order 693, dated 16 March 2007, the Commission approves Reliability Standard PER-003-0. In addition, pursuant to section 215(d)(5) of the FPA and Â§ 39.5(f) of our regulations, the Commission directs the ERO to develop a modification to PER-003-0 through the Reliability Standards development process that: (1) specifies the minimum competencies that must be demonstrated to become and remain a certified operator and (2) identifies the minimum competencies operating personnel must demonstrate to be certified.FERC has not stated that competencies must be a NERC standard but have minimum competencies that must be demonstrated to become and maintain a certified operator. The NERC System Operator Certification Program has processes in place for ensuring that minimum competencies are current in order to obtain a NERC certificate. The maintenance of minimum competencies are within the NERC SOCCED program. This will allow the NERC System Operator Certification Program to adjust competencies as required to meet changing demands without the time needed to go through the standards development process.We feel the FERC directive is being met in the NERC System Operator Certification Program process and we ask the SDT to eliminate all references to competencies in this standard as proposed so to reduce confusion and redundancies.</p>
Response:		
Brookfield Renewable Power Inc	No	It does not recognize other training
Response:		

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 11 Comment
Pepco Holdings, Inc - Affiliates	No	No, if the language change is not adopted. Yes, provided the changes to the language in the requirements and the measures statements is adopted as we proposed.
Response:		
Entergy Services	No	Our group feels that competency is NOT demonstrated simply by passing an exam and accumulating the required number of continuing education hours to maintain certification. Competency is developed by honing a System Operator's skills in performing the company-specific tasks that will enhance the reliability of the Bulk Electric System. System Operator performance and competency is best evaluated by the entity itself. The national certification program only ensures a minimum level of knowledge required to develop competency.
Response:		
SERC Standards Review Group	No	Our group feels that competency is NOT demonstrated simply by passing an exam and accumulating the required number of continuing education hours to maintain certification. Competency is developed by honing a System Operator's skills in performing the company-specific tasks that will enhance the reliability of the Bulk Electric System. System Operator performance and competency is best evaluated by the entity itself. The national certification program only ensures a minimum level of knowledge required to develop competency through experience in operating the system.
Response:		
Independent Electricity System Operator	No	Rather than state FERC's requirement as an obligation of the individual operator to demonstrate minimum competency in each topical area, the requirement should be stated as an obligation of NERC to ensure the certification exams reflect the stated topical areas. See our responses to Q3, Q4 and Q5.
Response:		
Xcel Energy	No	Recommend development of a standard that applies to the ERO on what the certification process must demonstrate and contain. The areas of competency in this standard do not compel the ERO to guarantee that their certification process ensures that a certified system operator meets these minimum competency levels.
Response:		

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 11 Comment
NERC PCGC	No	Section 600 of the Rules of Procedure of the North American Electric Reliability Corporation states “the System Operator Certification Program provides the mechanism to ensure system operators are provided the education and training necessary to obtain the essential knowledge and skills and are therefore qualified to operate the bulk electric system. NERC, as the ERO, will ensure skilled, trained, and qualified system operators through the System Operator Certification Program. NERC shall develop and maintain a personnel certification program to evaluate individuals and to issue credentials to individuals who demonstrate the required level of competence.”4. The personnel certification program governing body shall have control over the matters related to the personnel certification and recertification programs listed below, without being subject to approval by any other body.4.1 Policies and procedures, including eligibility requirements and application processing.4.2 Requirements for personnel certification, maintaining certification, and recertification.4.3 Examination content, development, and administration.4.4 Examination cut score.This standard should only ensure that reliability related tasks are being performed by NERC Certified System Operators.
Response:		
Georgia System Operations Corporation	No	The areas of competency are not needed in the standard since they are already in the NERC certification program. The standard should refer to the System Operator Certification program and not list the areas of competency.The NERC System Operator Certification Program states that it “awards certification credentials to those individuals who demonstrate that they have attained sufficient knowledge relating to NERC reliability standards and the basic principles of bulk power system operations by passing one of four specialty examinations.”The System Operator Certification mission is to “ensure that employers have a workforce of system operators that meet minimum qualifications.”
Response:		
IPCo	No	the Competecies should not be part of this standard.
Response:		
Consumers Energy Company	No	The functional entities have no responsibility and no recourse to the design of the certification process. They cannot determine what is demonstrated by an operator passing a certification examination. They cannot be held responsible for anything they cannot control.

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 11 Comment
Response:		
Long Island Power Authority	No	The term "minimum competencies" will be difficult to demonstrate compliance to. The term is very open to conflicting interpretation. A possible alternative is reference to the System Operator Certification Program manual. The demonstration and measurement of System Operator competencies is better suited to the Standard PER-005, and is another reason why the requirement should be limited to the possession of a current and valid NERC certificate.
Response:		
Alberta Electric System Operator	No	There is an established process in place for NERC Certification. This standard should just ensure reliability related tasks are being performed by NERC Certified System Operators.
Response:		
ERCOT ISO	No	There is an established process in place which defines the minimum competencies for NERC Certification. This meets the Commission's directive in FERC Order 693.
Response:		
NIPSCO	No	These specific competencies should be covered in the new PER-005 Standard and not in the certification standard.
Response:		
BCTC	No	This is a violation of the PCGC Charter. There is an established process in place for NERC Certification. This standard should just ensure reliability related tasks are being performed by NERC Certified System Operators.
Pacific Gas and Electric Company	No	This is a violation of the PCGC Charter. There is an established process in place for NERC Certification. This standard should just ensure reliability related tasks are being performed by NERC Certified System Operators.
WECC Operations Training	No	This is a violation of the PCGC Charter. There is an established process in place for NERC Certification.

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 11 Comment
Subcommittee		This standard should just ensure reliability related tasks are being performed by NERC Certified System Operators.
Response:		
E.ON U.S. LLC	No	Topical areas required to demonstrate minimum competencies should be (and are) addressed in the NERC certification process - they should not part of a requirement in a Reliability Standard
Response:		
American Transmission Company	No	We believe that the inclusion of the minimum competency list is unnecessary because the NERC System Operator Certificate program already addresses these competencies. The SDT should work with the NERC System Operator Certification group to develop a summary of the NERC Certification program in order to address FERC's concern.
Response:		
Midwest ISO Stakeholder Standards Collaborators	No	While adding areas of competency addresses FERC directives, it does not add any value to the standard by furthering reliability. What is really needed is a standard that applies to the ERO on what the certification process must demonstrate and contain. These areas of competency in this standard do not compel the ERO to guarantee that their certification process ensures that a certified system operator meets these minimum competency levels.
Response:		
Transmission and Reliability (TRO), TVA	No	While adding areas of competency addresses FERC directives, it does not add any value to the standard by furthering reliability. By including these competencies in the standard as sub-requirements it implies the entity is responsible for additional demonstration of competency beyond that of operator certification, which has been identified as the only measure.
Response:		
Hydro-Québec TransEnergie (HQT)	No	With the diversity of operational structures throughout the four Interconnections, it would not be a prudent approach to identify minimum competencies, as these proficiencies may be demonstrated in different ways to address different situations (i.e. using differing tools and systems), depending on the organizational

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 11 Comment
		<p>structures. The initial exam requirement to become certified is directed at conceptual understanding of power system operations. Subsequent on-going training requirements should “drill down” to more area-specific competencies. Mention must be made of what constitutes an approved course for continuing education, even if it is just a statement that any continuing education courses must be NERC approved. Competency Areas identified in the requirements are tied to the 2007 Version of the NERC Certification Exams. Many operators were certified based on an exam prior to 2007 which did not have the competency areas identified in the requirements of this proposed standard. Once an operator is certified, his competency/proficiency is supposed to be maintained by participation in a Continuing Education Program or at a minimum the training required by PER-002 Requirement 4. There is no mention of a requirement to participate in continuing education or a training program that will maintain competency/proficiency.</p>
Northeast Power Coordinating Council	No	<p>With the diversity of operational structures throughout the four Interconnections, it would not be a prudent approach to identify minimum competencies, as these proficiencies may be demonstrated in different ways to address different situations (i.e. using differing tools and systems), depending on the organizational structures. The initial exam requirement to become certified is directed at conceptual understanding of power system operations. Subsequent on-going training requirements should “drill down” to more area-specific competencies. Mention must be made of what constitutes an approved course for continuing education, even if it is just a statement that any continuing education courses must be NERC approved. Competency Areas identified in the requirements are tied to the 2007 Version of the NERC Certification Exams. Many operators were certified based on an exam prior to 2007 which did not have the competency areas identified in the requirements of this proposed standard. Once an operator is certified, his competency/proficiency is supposed to be maintained by participation in a Continuing Education Program or at a minimum the training required by PER-002 Requirement 4. There is no mention of a requirement to participate in continuing education or a training program that will maintain competency/proficiency.</p>
Response:		
Bonneville Power Administration	Yes	
Duke Energy	Yes	
Manitoba Hydro	Yes	
PacifiCorp	Yes	

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 11 Comment
Platte River Power Authority Operations Group	Yes	
South Carolina Electric and Gas	Yes	
Southern Company Transmission	Yes	
US Bureau of Reclamation	Yes	
City of Tallahassee (TAL)	Yes	Although this could have been better addressed through the NERC System Operator Certification Program and that process. The performance standard (PER-003) could have remained the Version 0, and only required that they be certified at the appropriate level.
Response:		
ISO RTO Council Standards Review Committee	Yes	The competencies should be addressed in the development of the certification exam and NOT in this standard. This standard should simply require the operators to obtain the requisite certification. We believe that, given the diversity of operational structures throughout the four Interconnections, it would not be a prudent approach to identify minimum competencies, as these proficiencies may be demonstrated in variable ways (e.g., using differing tools and systems), depending on the organizational structures. It is our understanding that the initial exam requirement is intended to assess conceptual understanding of power system operations. We equate this proposed method (as contained in the existing draft version 1) to be similar to taking a driving exam to prove that you, indeed, know the rules of the road. This does not, however, translate into all driving situations well. Such is the NERC Certification exam versus on-going training requirements. We applaud the SDT members for not feeling compelled to simply adopt FERC Order 693 comments and for proactively evaluating their impact on the Reliability of power system operations. We encourage other SDT to take the same approach.
Response:		
ISO New England Inc.	Yes	We believe that, given the diversity of operational structures throughout the four Interconnections, it would not be a prudent approach to identify minimum competencies, as these proficiencies may be demonstrated in variable ways (i.e. using differing tools and systems), depending on the organizational structures. It is our understanding that the initial exam requirement is intended to conceptual understanding of power system operations. We equate this proposed method (as contained in the existing draft version 1) to be similar to

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Yes or No	Question 11 Comment
		taking a driving exam to prove that you, indeed, know the rules of the road. This does not, however, translate into all driving situations well. Such is the NERC Certification exam versus on-going training requirements. We applaud the SDT members for not feeling compelled to simply adopt FERC Order 693 comments and for proactively evaluating their impact on the Reliability of power system operations. We encourage other SDT to take the same approach.
Response:		

12. If you are aware of any conflicts between the proposed standard and any regulatory function, rule order, tariff, rate schedule, legislative requirement, or agreement please identify the conflict in the comments section.

Summary Consideration:

Organization	Question 12 Comment
Alberta Electric System Operator	
American Transmission Company	
BCTC	
Bonneville Power Administration	
Brookfield Renewable Power Inc	
City of Tallahassee (TAL)	
E.ON U.S. LLC	
ERCOT ISO	
FirstEnergy	
Gainesville Regional Utilities	
Manitoba Hydro	
Midwest ISO Stakeholder Standards Collaborators	

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Question 12 Comment
Nebraska Public Power District	
Pacific Gas and Electric Company	
Pepco Holdings, Inc - Affiliates	
Public Service Enterprise Group Inc. Companies	
Southern Company Transmission	
US Bureau of Reclamation	
WECC Operations Training Subcommittee	
Xcel Energy	
Entergy Services	A conflict exists with the fact that the definition of System Operator in the Glossary of Terms Used in Reliability Standards includes individuals who staff Generator Operator control centers. We do not feel that such individuals should require System Operator certification and should therefore be removed from the System Operator definition in the Glossary.
SERC Standards Review Group	A conflict exists with the fact that the definition of System Operator in the Glossary of Terms Used in Reliability Standards includes individuals who staff Generator Operator control centers. We do not feel that such individuals should require System Operator certification and should therefore be removed from the System Operator definition in the Glossary.
Response:	
IPCo	conflicts with PCGC charter
Response:	

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Question 12 Comment
Long Island Power Authority	LIPA believes the proposed Standard "shall staff its real-time operating positions with System operators who have demonstrated minimum competency in the areas listed" could infer that Registered Entities be in compliance with PER-005-1 prior to the effective date of PER-005-1, when the intent of PER-003 is to assure that the Registered Entity has staffed its real-time operating positions with System Operators possessing a valid Nerc Certificate.
Response:	
NERC Standards Review Subcommittee	N/A
Georgia System Operations Corporation	N/C
Consumers Energy Company	No
Hydro-Québec TransEnergie (HQT)	No
American Electric Power (AEP)	No known regulatory conflicts.
ISO New England Inc.	No.
Duke Energy	None
ISO RTO Council Standards Review Committee	None
NIPSCO	None
PacifiCorp	None
Northeast Power Coordinating Council	None.

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Question 12 Comment
Transmission and Reliability (TRO), TVA	None.
South Carolina Electric and Gas	Not aware of any.
Independent Electricity System Operator	We are not aware of any conflicts.
Platte River Power Authority Operations Group	We believe the standard as written ...shall staff its real-time operating positions with System Operators who have demonstrated minimum competency in the areas listed could infer that registered entities be in compliance with PER-005-1 when in reality the intent of the Standard is to assure registered entities have staffed real-time operating positions with System Operators that have an appropriate, valid NERC certificate.
Response:	
NERC PCGC	Yes. There is a conflict between FERC Order 693 and the ROP, section 600, which were approved post FERC Order 693. See comment for #11
Response:	

13. In Please provide any other comments (that you have not already provided in response to the questions above) that you have on the draft standard PER-003-1.

Summary Consideration:

Organization	Question 13 Comment
BCTC	
Bonneville Power Administration	
Brookfield Renewable Power Inc	
City of Tallahassee (TAL)	
E.ON U.S. LLC	
Gainesville Regional Utilities	
Hydro-Québec TransEnergie (HQT)	
Manitoba Hydro	
Midwest ISO Stakeholder Standards Collaborators	
Nebraska Public Power District	
Northeast Power Coordinating Council	
Pepco Holdings, Inc - Affiliates	

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Question 13 Comment
Platte River Power Authority Operations Group	
Public Service Enterprise Group Inc. Companies	
Southern Company Transmission	
US Bureau of Reclamation	
Georgia System Operations Corporation	A section on training of operators that was in the old standard still should be addressed in the updated standard. If not, an interpretation of this standard would not allow a trainee, working on achieving his NERC certification, to gain operating experience working under the direct supervision of a certified system operator.
Response:	
ERCOT ISO	ERCOT ISO believes that minimum competencies do not belong in this standard. The terms “competent” and “competencies” are not interchangeable. Competent is a measure of a person’s ability to perform. Competencies are, generally speaking, the knowledge and skills a person must have in order to develop or achieve competence. Some competencies (a minimum body of knowledge) can be demonstrated by the current NERC certification process. Other competencies that are not demonstrated by the current NERC certification process are defined and evaluated by the individual Registered Entities. When combined with the knowledge competencies, the Registered Entity then verifies that the individual is competent to perform its assigned tasks. Each ISO or RE should be allowed to establish qualification criteria for operating within its region. Furthermore, there is more flexibility within the existing process by going through the Personnel Certification Governance Committee for changing minimum competencies than there would be to change minimum competencies if they were added into the NERC standards.
Response:	
NERC PCGC	It is suggested that we leave the competencies with PER-005 and leave them out of this standard.
Response:	
Long Island Power Authority	LIPA suggests consideration of a requirement to require each RC/TOP/BA to have at least one position staffed with a

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Question 13 Comment
	<p>System Operator possessing a valid NERC Certificate, 24 hours a day, seven days a week, responsible for the control of the bES munder R1/R2/R3. This requirement will eliminate the ambiguity of the definition of real-time operating positions responsible for the control of the BES.2.Consideration for a requirement that clearly states the requirement of possessing a valid NERC certificate before a System Operator can fill a real-time operating position responsible for the control of the BES. It is our opinion that the phrase "demonstrated minimum competency in the areas listed to obtain and maintain a valid NERC Reliability Operator certificate" can be interpreted as not requiring the possession of a valid NERC Certificate prior to staffing a real-time operating position. For example, minimum competency (which is undefined) can be demonstrated by a test given by the Registered Entity to a System Operator prior to the System Operator completing the NERC Certification process. If the pupose of this Standard is to demonstrate competency via the NERC certification process then the requirements should clearly state so.</p>
Response:	
NERC Standards Review Subcommittee	N/A
Consumers Energy Company	None
PacifiCorp	None
South Carolina Electric and Gas	None
Entergy Services	None not already stated above.
SERC Standards Review Group	None not already stated above.
Transmission and Reliability (TRO), TVA	None.
Independent Electricity System Operator	<p>PER-003-0 (Version 0) M1.1 provided for or stated that it was permissible for an operator-in-training without proper NERC certification to perform reliability related tasks while under direct and continuous supervision. PER-003-1 is now silent in this regard. Does this mean that it is still permissible for O-I-T's or other uncertified operations staff to perform these tasks under direct and continuous supervision and that it was deemed unnecessary to specifically mention this fact? To avoid compliance uncertainty in the future, we recommend reinstating the wording of PER-003-0 M1.1 or</p>

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Question 13 Comment
	equivalent.
Response:	
NIPSCO	R1.2 from the existing PER-003-0 “Positions directly responsible for complying with NERC standards” was removed; the word “both” in R1 tied this to the real time operations. This is a key change to the standard that I think should be questioned and noted. In determining who should be NERC certified some entities can presently exclude people who are not familiar at all with complying to NERC Standards however they may be operating the BES. Another issue that came up during a proposed interpretation discussion a few years ago was that if a real time operator can act “independently”, like shed load without asking a supervisor, then that person should be certified. This excluded switchmen and local dispatch center personnel who would ask for direction from a certified operator before acting on the BES. I think both these issues should be addressed or at least brought to the attention of people commenting.
Response:	
Duke Energy	The “Reliability Operator” certificate is for Reliability Coordination. The name of the certificate should be made consistent with the task.
Response:	
Xcel Energy	The current version of PER-003 addresses the allowability of non-NERC certified individuals (trainees) performing tasks of an RC, BA, or TOP under direct supervision of a certified individual and we believe there should be a requirement that explicitly allows that to occur. The current version of PER-003 addresses the allowable time that non-NERC certified personnel may staff positions when transitioning to an alternate control center. We believe this should be addressed in the requirements and also be consistent with the allowable transition time specified in EOP-008.
Response:	
IPCo	The PCGC issues the credentials for the Operator Certification, How Does the ERO audit the PCGC for NERC compliance for issuing the certificates?
Response:	
FirstEnergy	The phrase "real-time" used in the standard should be capitalized (Real-time) since it is a NERC Glossary term.

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Question 13 Comment
Response:	
Pacific Gas and Electric Company	The WECC OTS does not feel competencies belong in this standard. There is not a defined method to measure competencies associated with taking and passing an exam. No requirements should be included in the standard that do not have associated measures. The WECC OTS believes addressing competencies belongs in a training standard.
WECC Operations Training Subcommittee	The WECC OTS does not feel competencies belong in this standard. There is not a defined method to measure competencies associated with taking and passing an exam. No requirements should be included in the standard that do not have associated measures. The WECC OTS believes addressing competencies belongs in a training standard.
Response:	
American Electric Power (AEP)	There are potential gaps and conflicting information in the NERC CE Program and System Operator Certification Program Manual with respect the demonstrated competencies and Appendix A for recognized training topics. As explained in Section 600 - Personnel Certification of the Rules of Procedure of the NERC, these gaps and conflicting information will need to be addressed by the PCGC. The PCGC, in coordination with the NERC Personnel Subcommittee, should continue to manage the demonstrated competency areas and measuring thereof going forward. PER-005-1 should be modified to identify the company-specific reliability-related tasks of the identified competency areas to be addressed with a systematic training approach.
Response:	
American Transmission Company	This SDT should look at the new PER-005 standards as an additional source to show that the minimum competency list is being addressed.
Response:	
ISO New England Inc.	We believe the purpose of this Standard is to a) pass the correct test to obtain the certification; and b) identify the Areas of Competency for maintaining the certifications through the use of Continuing Education Hours (CEHs). However, we do not believe the Standard is written clearly enough so that the entire industry would interpret it in the same fashion. We believe the Standard need to be clarified to make it more clear for the industry.
ISO RTO Council Standards Review Committee	We believe the purpose of this Standard is to a) pass the correct test to obtain the certification; and b) identify the Areas of Competency for maintaining the certifications through the use of Continuing Education Hours (CEHs). However, we do not believe the Standard is written clearly enough so that the entire industry would interpret it in the same fashion.

Consideration of Comments on Operating Personnel Credentials Standard (Project 2007-04)

Organization	Question 13 Comment
	We believe the Standard needs to be clarified to make it more clear for the industry.
Response:	
Alberta Electric System Operator	We do not feel that competencies belong in this standard. Competencies are addressed in PER005 by requiring training programs to be developed based on the entity's BES reliability-related task list. Since each entity is required to be compliant with the appropriate NERC Reliability standards, the task list will identify relevant competencies. From PER005 - "Purpose: To ensure that System Operators performing real-time, reliability-related tasks on the North American Bulk Electric System (BES) are competent to perform those reliability-related tasks. The competency of System Operators is critical to the reliability of the North American Bulk Electric System."
Response:	