Individual or group. (33 Responses)
Name (23 Responses)
Organization (23 Responses)
Group Name (10 Responses)
Lead Contact (10 Responses)
Question 1 (32 Responses)
Question 1 Comments (33 Responses)
Question 2 (30 Responses)
Question 2 Comments (33 Responses)
Question 3 (32 Responses)
Question 3 Comments (33 Responses)
Question 4 (32 Responses)
Question 4 Comments (33 Responses)
Question 5 (0 Responses)
Question 5 Comments (33 Responses)

Individual
Brad Pederson
Portland General Electric
Yes
PGE agrees with WECC Position Paper for the Ballot of PER-003-1 - Certifying System Operators
Yes
PGE agrees with WECC Position Paper for the Ballot of PER-003-1 - Certifying System Operators
Yes
PGE agrees with WECC Position Paper for the Ballot of PER-003-1 - Certifying System Operators
Yes
PGE agrees with WECC Position Paper for the Ballot of PER-003-1 - Certifying System Operators
Individual
Dan Rochester
Independent Electricity System Operator
Yes
Yes
Yes
Yes
Individual
Michael Lombardi
Northeast Utilities
Yes
Yes
Yes
Yes

Individual	
Joylyn Faust	
Consumers Energy	
Yes	
Yes	
12 months is adequate, but not less than 12 months.	
Yes	
There is no need for footnote (1). Of particular concern is the phrase "at that position". This can be taken quite literally to a qualified operator who is required to sit behind the trainee. Consumers contends the Trainee is sufficiently supervised by a NERC Certified Operator that has the responsibility for the position and is monitoring the position. There is no need for this addition.	
Yes	
Please see comment #3.	
Individual	
Edward c. Stein	
self	
Yes	
Yes	
Yes	
Yes	
The changes try to clarify the motherhood and apple pie statements. the real test will be how the Compliance people interpret and measure the standard	
Individual	
Joe O'Brien	
NIPSCO	
Yes	
Yes & No, it's still vague who must be certified and in the SAR it was suggested that this issue be addressed as it relates to the 2006 unapproved interpretation. However, from a compliance point of view we're not sure if this is a bad thing.	
Yes	
Time seems adequate	
Yes	
Yes & no, it's still vague who must be certified and in the SAR it was suggested that this issue be addressed as it relates to the 2006 unapproved interpretation. However, from a compliance point of view we're not sure if this is a bad thing.	
No	
No, "reliability related tasks" should be included in the measurements M1.1 & M1.2 since only the system operators performing such tasks need to be certified.	
In the context of NERC Reliability Standards we believe that Generator Operator should be removed from the System Operator definition. Throughout the standards and the SOCCED we think that System Operator includes only BA, RC & TOP. Also, it was suggested in the SAR that "grandfathering" be addressed and we don't see that.	
Group	
Northeast Power Coordinating Council	
Guy Zito	
Yes	
Yes	
Yes	

Yes	
Individual	
John Bee	
Exelon	
Yes	
Yes	
Yes	
Yes	
Individual	
Jonathan Appelbaum	
The United Illuminating Company	
Yes	
Yes	
Yes	
Yes	
For clarity, consider modifying M1 to include the phrase performing reliability-related tasks, e.g A list of Real-time operating positions performing reliability-related tasks.	
Individual	
Kasia Mihalchuk	
Manitoba Hydro	
Yes	
Yes	
Yes	
Yes	
Group	
Platte River Power Authority	
Deborah Schaneman	
Yes	
Yes	
Yes	
Yes	

Individual	
Greg Rowland	
Duke Energy	
Yes	
Yes	
No	
• R1, R2 and R3 – Strike the phrase "in the areas listed" from each requirement, and delete Sections 1.1, 2.1 and 3.1. We believe that listing the Areas of Competency in these three requirements is unnecessary to satisfy the Order 693 directive, since the requirements clearly link competency to NERC certification, and the Operator Certification program documents list the Areas of Competencies. Also if the Areas of Competency were ever modified, then you'd have to generate a revision to the standard. We believe that incorporating them by reference is a better way. • If the SDT decides that the Areas of Competency must be listed in the standard, then they should be bulleted and not numbered like sub-requirements, because you can't graduate VSLs for the requirement based upon them. • R2 and R3 – The Certificates should be included in the text of the requirements and not numbered like sub-requirements. If the Areas of Competency are deleted, then you could leave the Certificates under the requirements, but if so they should be bulleted and not numbered like sub-requirements. Also, delete the phrase "Part 2.2" from the R2 VSL and delete the phrase "Part 3.2" from the R3 VSL. • R1 and R2 Footnote – we agree with this clarifying footnote, but question whether it carries the same weight as if it were included as part of the requirements (i.e. could an entity still be found non-compliant for having a non-certified trainee learning or observing?).	
No	
We believe M1.1 creates potential for confusion and should be deleted. It is not part of any of the requirements. M1.2, M1.3 and M1.4 are sufficient.	
Individual	
RoLynda Shumpert	
South Carolina Electric and Gas	
Yes	
Yes	
Yes	
Yes	
Individual	
Matt Brewer	
San Diego Gas and Electric Co.	
No	
The term "NERC System Operator Certification Program" needs to be defined.	
Yes	
No	
In R2, "Transmission Operator reliability-related tasks" need to be clearly defined and/or identified. Additionally, the following insertions between brackets need to be made to the text: ". . . in the areas listed <in R2.1> by obtaining and maintaining one of the following valid NERC certificates <listed in R2.2>.	
No	
How about emergency exceptions? The previous version of this standard, PER-003-0, allows for emergency exceptions in M1.2.	
Section D, #2 (Violation Severity Levels) -- there has to be some variations to VSLs. Currently, only Severe VSLs are defined. The previous version of this standard, PER-003-0, specified variations in the Levels of Non-Compliance.	
Group	
NextEra Energy	
Silvia Parada Mitchell	

Yes
Yes
No
Suggest the following edits to clarify further and be consistent with standards formatting: R1. Each Reliability Coordinator shall staff its Real-time operating positions performing Reliability Coordinator reliability-related tasks with System Operators who have demonstrated minimum competency in the areas listed in R1.1 below, by obtaining and maintaining a valid NERC Reliability Operator certificate (1[Risk Factor: High][Time Horizon: Real-time Operations] R1.1. Areas of competency (based on exam content outline) R1.1.1. Resource and demand balancing R1.1.2. Transmission operations R1.1.3. Emergency preparedness and operations R1.1.4. System operations R1.1.5. Protection and control R1.1.6. Voltage and reactive R1.1.7. Interchange scheduling and coordination R1.1.8. Interconnection reliability operations and coordination R2. Each Transmission Operator shall staff its Real-time operating positions performing Transmission Operator reliability-related tasks with System Operators who have demonstrated minimum competency in the areas listed in R2.1 below, by obtaining and maintaining one of the valid NERC certificates listed in R2.2 below. (1) : [Risk Factor: High][Time Horizon: Real-time Operations]: R2.1. Areas of competency (based on exam content outline) R2.1.1. Transmission operations R2.1.2. Emergency preparedness and operations R2.1.3. System operations R2.1.4. Protection and control R2.1.5. Voltage and reactive R2.2. Certificates R2.2.1 Reliability Operator R2.2.2 Balancing, Interchange and Transmission Operator R2.2.3 Transmission Operator R3. Each Balancing Authority shall staff its Real-time operating positions performing Balancing Authority reliability-related tasks with System Operators who have demonstrated minimum competency in the areas listed in R3.1 below, by obtaining and maintaining one of the valid NERC certificates listed in R3.2 below.(1) : [Risk Factor: High][Time Horizon: Real-time Operations]: R3.1. Areas of competency (based on exam content outline) R3.1.1. Resources and demand balancing R3.1.2. Emergency preparedness and operations R3.1.3. System operations R3.1.4. Interchange scheduling and coordination R3.2. Certificates R3.2.1 Reliability Operator R3.2.2 Balancing, Interchange and Transmission Operator R3.2.3 Balancing and Interchange Operator
Yes
See question 3.
Individual
Jon Kapitz
Xcel Energy
Yes
None
Yes
Yes
We continue to assert that listing the competencies here is ineffective. This standard should only list the certificates required for each function (e.g. BA, TOP, RC). The competencies should be outlined in the governing documents for the certification development. Entities have no control over what is contained within the exams to obtain those certificates, thus it is pointless to even list those competencies in the standard unless they are applicable to the entity and they can do something to affect compliance with those competencies listed. To address concerns about competencies, we also believe that PER-005 spells out that operators have requirements to identify reliability tasks and have demonstrated competency to those tasks.
Individual
Thad Ness
American Electric Power (AEP)
Yes
Yes
No
AEP recommends that footnote number 1 should be removed from this standard. If it is to remain, AEP recommends that the language should be as follows: The NERC Certified System Operator has ultimate responsibility for the performance of the reliability-related tasks. If our recommendations are not accepted, then the term "operating position" needs to be formally defined or removed.

Yes	
Group	
Southern Company	
Andy Tillery	
Yes	
Yes	
No	

We believe the term "competency" should be changed to "capability" to more accurately reflect the purpose of the statement. The certification process assures that an operator is "capable" of performing reliability related tasks, not that the operator is "competent" in performing those tasks. In order to determine "competency", the operator would need to be observed over a long period of time to capture performance measures during various unexpected operating conditions. Therefore, the term "competency" should not be used in describing an operator who has simply been certified through the NERC System Operator Certification Program. Therefore we suggest changing the term "competency" to "capability" in each of the three requirements. We believe that listing the specific technical "Areas of Competency" under each requirement will be problematic and very hard to manage. By this method, in order to change a topic on the exam, you would also have to change the standard, creating a new SAR, comment period, ballot, and approval. The technical capabilities are already listed in the exam and should be left there where they are more easily updated. Further issues with this draft listing the "Areas of Competency" are that each listed area is numbered as a sub-requirement of the standard, yet no measure exists that is related to each of these sub-requirements. This in effect creates an issue of how to determine compliance. Therefore, we suggest striking the entire sub-section "Areas of Competency" from each of the three requirements. However, if the drafting team chooses to keep these sections, we request the heading be changed to "Areas of Capability" (in line with our previous comment), that bullets be used instead of numbers, and that the list be moved to the appendix instead of being listed as a sub section in each of the three requirements.

No

Again, in line with our comment on #3, we request that "competency" be changed to "capability". M1.1 asks for a "list of Real-time operating positions". Those titles are unique to each entity that creates them and will undoubtedly vary across industry. This inconsistency will only lead to confusion during audits as each title will have to be explained for that specific entity. The specific position title should not matter as long as the entity can provide evidence of each operator's NERC certification and specific credentials. Therefore we suggest that M1.1 be removed from the list of measures. M1.2 requests a "list of System Operators assigned to its Real-time operating positions" while M1.4 requests "evidence showing which System Operators were assigned to work in Real-time operating positions." We feel that M1.2 is inherently present in M1.4, since the evidence provided in M1.4 will identify the list of Operators requested in M1.2, and therefore the two measures should be combined. To further clarify the term "NERC Certified" should precede the term "System Operators" in the new combined measure. M1.3 asks for "a copy of each of its System Operator's NERC Certificate" OR "NERC certificate number with expiration date." We feel that attempting to maintain a copy of each operator's certificate could be problematic since only the operator has access to the actual certificate. A simpler solution would be to just maintain a list of NERC certificate numbers and the issuance/expiration dates associated. In the event this information is not readily available from the operator, the employer then has recourse to get confirmation from NERC that an individual in fact holds a valid NERC certificate. (Ref: p.14 of the System Operator Certification Program Manual, updated Nov. 2009) While the current draft is phrased as one or the other, we feel that appearances could be created that an entity is not fully complying with the measure if the copy cannot be produced. Therefore we request that the first part of the statement referencing copies of the certificate be removed and just the list of certificate numbers be used for measure. The revised M1.3 would read "NERC certificate number with issuance & expiration date for each System Operator."

For consistency and to better identify the application of the standard, we suggest changing the title to "Real-time Operating Personnel Credentials" Also for consistency with other standards, we suggest changing the measure numbering to directly reflect the corresponding requirement numbering.

Individual	
Ed Davis	
Entergy Services	
Yes	
Yes	
No	

The requirements and measures both focus on the activity of achieving and maintaining certification at the appropriate certification level. The list of competencies are not needed. The exam working group determines the content of the exam, and the entity doesn't have control over that content, to ensure that the list of competencies included in the requirements are all covered in the exam to the degree needed. The list of minimum competencies should be removed from the requirements.		
No		
M1.3 – It should not be necessary to provide a copy of the NERC certificate. A list of operators and certificate numbers and dates should be sufficient. NERC should be able to verify if the names and numbers are correct and current. I recommend that only the certificate number be required in M1.3		
Group		
Bonneville Power Administration		
Denise Koehn		
Yes		
Yes		
Yes		
Yes		
Individual		
Eric Senkowicz		
FRCC Manager of Operations		
Yes		
Yes		
No		
Suggest the following edits to clarify further and be consistent with standards formating and capitalization of defined terms: R1. Each Reliability Coordinator shall staff its Real-time operating positions performing Reliability Coordinator reliability-related tasks with System Operators who have demonstrated minimum competency in the areas listed in R1.1 below, by obtaining and maintaining a valid NERC Reliability Operator certificate (1[Risk Factor: High][Time Horizon: Real-time Operations] R1.1. Areas of Ccompetency (based on exam content outline) R1.1.1. Resource and demand balancing R1.1.2. Transmission operations R1.1.3. Emergency preparedness and operations R1.1.4. System operations R1.1.5. Protection and control R1.1.6. Voltage and reactive R1.1.7. Interchange scheduling and coordination R1.1.8. Interconnection reliability operations and coordination R2. Each Transmission Operator shall staff its Real-time operating positions performing Transmission Operator reliability-related tasks with System Operators who have demonstrated minimum competency in the areas listed in R2.1 below, by obtaining and maintaining one of the valid NERC certificates listed in R2.2 below. (1) : [Risk Factor: High][Time Horizon: Real-time Operations]: R2.1. Areas of competency (based on exam content outline) R2.1.1. Transmission operations R2.1.2. Emergency preparedness and operations R2.1.3. System operations R2.1.4. Protection and control R2.1.5. Voltage and reactive R2.2. Certificates R2.2.1 Reliability Operator R2.2.2 Balancing, Interchange and Transmission Operator R2.2.3 Transmission Operator R3. Each Balancing Authority shall staff its Real-time operating positions performing Balancing Authority reliability-related tasks with System Operators who have demonstrated minimum competency in the areas listed in R3.1 below, by obtaining and maintaining one of the valid NERC certificates listed in R3.2 below.(1) : [Risk Factor: High][Time Horizon: Real-time Operations]: R3.1. Areas of competency (based on exam content outline) R3.1.1. Resources and demand balancing R3.1.2. Emergency preparedness and operations R3.1.3. System operations R3.1.4. Interchange scheduling and coordination R3.2. Certificates R3.2.1 Reliability Operator R3.2.2 Balancing, Interchange and Transmission Operator R3.2.3 Balancing and Interchange Operator		
Yes		
Please see presponse to question 3. Thanks for the opportunity to comment.		
Individual		
Matt Stryjewski		
BGE		

We support the clarification of PER-003 in this new revision. We also support the use of the NERC System Operator Certification Program as a manner in which to ensure that System Operators can demonstrate competency in the reliability-related tasks of their position.	
Group	
Electric Market Policy	
Mike Garton	
Yes	
Yes	
No	
Dominion recommends changes to the above sentence to read as follows; "System Operators who have obtained and maintain one of the following valid NERC certificates:" Dominion suggests the phrase 'in the areas listed' implies something that can be construed by an auditor as something measurable. R1. and R2. both contain 'Areas of Competency' which an auditor could interpret as sub requirements. They are not explicitly represented in the measures section as it currently exists. The 'Areas of Competency' are included in the NERC SO examination. Inserting "obtained and maintain" simplifies the standard. 'Obtaining and maintaining' are used in the measures section (M1.).	
No	
Dominion recommends changes to the above sentence to read as follows; M1.3 System Operators name and NERC certificate number. Dominion believes providing a 'copy' of a certificate does not represent the validity of the certificate. The "proof" is the NERC certificate test results which NERC has on file internally. SO Name and certificate number should be sufficient. M1.1, M1.2, are redundant to M1.4. Eliminate M1.1 and M1.2. ET recommends changes to the above sentence to include 'NERC certified' M 1.4 Work schedules, work logs, or other equivalent evidence showing which 'NERC certified' System Operators were assigned to work in Real-time operating positions.	
Consider changing title of Standard to include "Real Time" Operating Personnel Credentials Standard. This would eliminate the potential ambiguity or perception requiring Transmission Planners and other support staff to be NERC certified.	
Individual	
Laura Zotter	
ERCOT ISO	
Yes	
Yes	
No	
ERCOT ISO disagrees with the use of the word competency and thinks the word knowledge applies more appropriately. The current NERC certification tests knowledge and the ability to cognitively apply that knowledge to problems. As another alternative, ERCOT ISO agrees with the SRC comments to remove the word "competency" and reword the requirement as follows: "Each [operating entity] shall staff its Real-time operating positions performing [operating entity] reliability-related tasks with System Operators who have obtained and maintain one of the following valid NERC certificates:".	
No	
As explained in its response to Question 3, ERCOT ISO disagrees with the use of the word "competency" and thinks the word "knowledge" applies more appropriately. ERCOT ISO agrees with the wording of the measures, as they apply to all the requirements.	
As explained in its response to Question 3, ERCOT ISO disagrees with the use of the word "competency" and thinks the word "knowledge" applies more appropriately. These requirements are part of the System Operator Certification and are assessed by the Personnel Certification Governance Committee (PCGC).	
Group	
FirstEnergy	
Sam Ciccone	
Yes	
Yes	

Yes	
Yes	
FE supports the changes and thanks the drafting team for their hard work on this project.	
Individual	
Tony Kroskey	
Brazos Electric Power Cooperative, Inc.	
Yes	
No	
Should allow up to 18 months.	
No	
The requirements should simply state "Each [operating entity] shall staff its Real-time operating positions performing [operating entity] reliability-related tasks with System Operators who have an appropriate and valid NERC certificate". The NERC certificate program by design establishes what the minimum competency is for each certificate type.	
No	
Simplify by striking "demonstrated the applicable minimum competency by obtaining and maintaining" from the Measure.	
Individual	
Martin Bauer	
US Bureau of Reclamation	
Yes	
No	
The definition of System Operators "An individual at a control center (Balancing Authority, Transmission Operator, Generator Operator, Reliability Coordinator) whose responsibility it is to monitor and control that electric system in real time." includes Generator Operators. The only reason the definition is not consistent with the standard and should be modified to exclude Generator Operator.	
Yes	
Group	
MRO's NERC Standards Review Subcommittee	
Carol Gerou	
Yes	
Yes	
No	
The NSRS recommends that the SDT changes "performing reliability-related tasks" to "meeting its functional obligations" to reflect recent changes made to other approved standards. In addition, the definition of "System Operator" includes "Generator Operator", however generator operators are not covered in any specific requirement in the standard. We believe the term "Generator Operator" should be removed from the definition of "System Operator", or specifically noted as not applicable for this standard, to remove any ambiguity in the implementation of this standard. The NSRS would also like to point out the Generator Operator is the Registered Entity that meet the obligations set in the NERC Statement of Compliance Registry Criteria (Revision 5.0) and not a person operating a generator.	
Yes	
The NSRS recommends that the requirements regarding the "minimum competencies" are misapplied to the functional entities. As stated in R1, R2, and R3 a System operator has to demonstrate minimum competencies that are obtained by a valid NERC Reliability Operator certificate. Applicable entities have no ability to know if these "areas of Competency" are adequately addressed within the NERC Certification Program (the test) or not. If the SDT believes	

that System Operators require a valid NERC Certificate to operate a Real-time position responsible for control of the BES, it should be simply stated. If not these Areas of Competency should apply to the ERO. The ERO should be required to create and maintain a certification program that meets the minimum competencies identified within the standard. Then the functional entities should simply be required to staff their System Operator positions with staff that has been become certified and maintained that certification through NERC. While some argue that standards cannot apply to the ERO, we would point out that the results-based standards approach approved by the NERC BOT does appear to allow requirements on the ERO. As an example, the recently posted Project 2009-01 Impact Event and Disturbance Assessment, Analysis, and Reporting includes many requirements on the ERO and is following the result-based approach.
Individual
Steve Toth
Covanta Energy
Yes
Yes
No
The definition of "System Operator" includes "Generator Operator", however generator operators are not covered in any specific requirement or applicability section in this standard. The term "Generator Operator" should be removed from the definition of "System Operator", or specifically noted as "not applicable" for this standard, to remove any ambiguity in the implementation of this standard. The Generator Operator is the registered entity that is expected to meet the obligations documented in the NERC Statement of Compliance Registry Criteria (Revision 5.0) and not a person operating a generator.
Yes
Group
Midwest ISO Standards Collaborators
Jason Marshall
Yes
Yes
No
To be consistent with other recently approved standards, we suggest changing "performing reliability-related tasks" to "meeting its functional obligations". This is the language used in the recently approved R1 EOP-008-1 and then ties the requirement back to the functional model which is task specific. We do also note that the term System Operator includes generator operators in the definition. However, generator operators are not covered in the standard in a specific requirement. This could cause some confusion on exactly to whom that standard applies.
Yes
The requirements regarding the minimum competencies are misapplied to the functional entities. They should apply to the ERO. The ERO should be required to create and maintain a certification program that meets the minimum competencies identified within the standard. Then the functional entities should simply be required to staff their System Operator positions with staff that has become certified and maintained that certification through NERC. While some argue that standards cannot apply to the ERO, we would point out that the results-based standards approach approved by the NERC BOT does appear to allow requirements on the ERO. As an example, the recently posted Project 2009-01 Impact Event and Disturbance Assessment, Analysis, and Reporting includes many requirements on the ERO and is following the results-based approach.
Group
SERC OC-SOS Standards Review Group
Margaret Stambach
Yes
Yes
No

Our group continues to believe that the term "competency" should not be used to describe an operator who has simply become certified through the NERC System Operator Certification Program. The certification process only assures that an operator is "capable" of perform reliability-related tasks. To deem the operator "competent" in performing such tasks, one would have to observe performance over a long period of time and under unexpected operating conditions. Changing the word "competency" to "capability" would make the statement above accurate. We also see the listing of specific technical areas under each requirement as problematic and prescriptive. By listing the areas, a process is set up that will potentially be very hard to manage. If a topic needs to be added or subtracted, the exam would be changed accordingly; however, then the standard would have to be changed, including creation of a SAR followed by industry comment, balloting periods, and approvals. The areas of capability for each function are all included in the certification exam requirements, and need not be listed in this draft standard. Furthermore, the fact that each technical area is numbered indicates that each one is a sub-requirement of the standard. Yet, there are no measures associated with the technical areas. So how can it be determined that an entity is compliant or non-compliant with this part of the standard? Our group suggests that the standard drafting team consider making the following changes to each of the three requirements: -- In the requirement statement, replace the word "competency" with "capability" and strike the phrase "in the areas listed". -- Strike the section "Areas of Competency". If these technical areas must be listed, change the heading to "Areas of Capability", use bullets instead of numbers, and move to an appendix of this standard.

No

In the Measure statement, the word "competency" should be changed to "capability" for the reasons given in our response to Question 3 above. For M 1.1, our group feels that maintaining a list of specific operating position titles as evidence may lead to confusion among the auditors. System operators who perform the same reliability functions will undoubtedly have different titles at different entities. These title differences could lead to unnecessary and lengthy discussions during the audit process. Our feeling is that the position title itself should not matter as long as an entity can show evidence that each operator is NERC-certified and in what specific credential. A good solution to streamline the measures and avoid confusion during an audit would be to fold both measures M 1.1 and M 1.2 into M 1.4. In M 1.4, add the phrase "NERC-certified" before "System Operators". The work schedules/work logs evidence required by M 1.4 will identify each operator assigned to perform Real-time reliability functions, as well as his/her Real-time operating position. M 1.1 & M 1.2 evidence is redundant and these measures can be eliminated. For M 1.3 – Our group strongly feels that maintaining a paper or electronic copy of each operator's actual NERC certificate is unnecessary and can be problematic, since only the operator has access to his/her actual certificate. Instead, the evidence of certification for System Operators should be simply a list of the certificate numbers and the issuance/expiration dates. If an employer does not have this information and cannot obtain it from the operator, the employer does have recourse to get confirmation from NERC that an individual holds a valid NERC certificate (Ref: p.14 of System Operator Certification Program Manual, updated November 2009). We realize that M 1.3 requires as evidence EITHER a copy OR the number/expiration date for the certificate; however the implication is that, if an actual copy cannot be produced, the entity is not complying as well with the standard as those entities that CAN produce a copy. This group feels that, for consistency and fairness to all entities, the certificate copy evidence should be eliminated. Therefore, we ask the standard drafting team to please consider changing the statement for M 1.3 to: M 1.3 NERC certificate number with expiration date for each System Operator.

To better identify the operators to whom this standard applies, please consider changing the title of the standard to "Real-time Operating Personnel Credentials" To be consistent with other reliability standards, please consider adjusting the numbering of the measures to be the same as the numbering of the requirements. The standard drafting team is to be commended for their thoughtful consideration of comments from the last review cycle, and their response to every concern from the industry. "The comments expressed herein represent a consensus of the views of the above named members of the SERC OC-SOS Standards Review Group only and should not be construed as the position of SERC Reliability Corporation, its board or its officers."

Individual
Darryl Curtis
Oncor Electric Delivery
Yes
Yes
Yes
Yes
Individual
Val Lehner
ATC
Yes

Yes
No
Although ATC appreciates the drafting team's attempt to provide clarity we disagree with the inclusion of the list of minimum competencies (Requirement 1.1, 2.1 and 3.1). An entity may be able to demonstrate the minimum competencies requirements by showing that all System Control Operators (SCO) have a valid NERC certificate, but we have major concerns that if an auditor asked for additional evidence an entity would not be able to comply. The NERC Certification test is developed and administered by the ERO (i.e. NERC). As a Registered Entity we have no ability to ensure that the minimum competency requirements are covered by the NERC Certification Test. But since they are identified as Requirements we are required to demonstrate compliance. NERC Standard PER-005 addresses the issue of continual education using a systematic approach to training. It is ATC strong opinion that the minimum competencies requirements be deleted from the standard and that NERC demonstrates to FERC that they address these minimum competencies in the NERC Certification exam. ATC believes that this standard should only require that SCO (RC, TOP and BA) be NERC Certified.
No
Clarity should be provided in M1.1. Is this a list of positions that could perform real-time operating positions or a job description? In addition changing the statement to read "Each Reliability Coordinator, Transmission Operator and Balancing Authority may use the following evidence…" will indicate that the entity may use other evidence to demonstrate compliance and that these are only examples. The measures should not be prescriptive or limiting
ATC recommends that the footnote be changed to read "Personnel learning or observing the tasks of an operating position must be under the direct supervision of a NERC Certified System Operator at that operating position who has the sole responsibility for the performance of the reliability-related task." Delete the words "non-NERC certified". ATC is concerned that the qualifying term "non-NERC Certified" is too prescriptive in identifying who qualifies as a trainee. Entities may have a trainee that is NERC Certified but has not been cleared to work the desk. The qualifying term (non-NERC Certified) would make it unnecessarily difficult for entities to identify those individuals as a trainee.