

# Project 2010-01 Training Industry Webinar FAQ

October 22, 2013

## Introduction

Proposed Reliability Standard PER-005-2 is currently posted for its second comment and ballot period. NERC and the standard drafting team (SDT) held a webinar on October 7, 2013 to discuss revisions that the SDT made to the draft standard in response to industry comments on the initial draft of the proposed standard. As a follow-up to that webinar and to provide additional information on the proposed standard for those stakeholders that were unable to attend the webinar, this document provides the SDT's responses to the most frequently asked questions from the webinar. For any stakeholders that would like further clarification on these responses or to discuss any other issues related to the proposed standard, please contact the NERC Standards Developer for Project 2010-01, Jordan Mallory, or one of the SDT members.

As background, the purpose of Project 2010-01 is to revise PER-005-1 to address FERC directives from Order Nos. 693<sup>1</sup> and 742.<sup>2</sup> Those directives include, among other things, extending the training requirements to (i) certain dispatch personnel of a Generator Operator (GOP), (ii) certain operations support personnel, and (iii) certain local transmission control center personnel of a Transmission Owner. In the FERC proceeding leading to Order No. 693, industry argued that certain FERC directives, including the extension of the training standard to certain GOP dispatch personnel and certain operations support personnel, were not necessary. FERC, however, rejected these arguments in Order No. 693. Further, when PER-005-1 was initially developed in response to FERC's directives in Order No. 693, industry again sought to push back on FERC directives and moved forward with a standard that did not extend the training requirement to operations support personnel or certain GOP dispatch personnel.<sup>3</sup> In Order No. 742 FERC refused to address industry arguments and directed NERC to modify PER-005-1 to address these directives. (See the PER Technical White Paper, [Appendix A: Industry Arguments and FERC Responses](#)). As such, industry carries the burden of proof to demonstrate that these directives are no longer necessary for reliability.

During the course of developing PER-005-2, with the exception of arguments related to the directive to consider whether there is a need to train EMS personnel, the SDT did not identify any new arguments as to why it need not respond to the outstanding directives.<sup>4</sup> As such, the SDT concluded it was obligated to

<sup>1</sup> *Mandatory Reliability Standards for the Bulk-Power System*, 118 FERC ¶ 61,218, FERC Stats. & Regs. ¶ 31,242 (Order No. 693), *order on reh'g, Mandatory Reliability Standards for the Bulk-Power System*, 120 FERC ¶ 61,053 (Order No. 693-A) (2007).

<sup>2</sup> *System Personnel Training Reliability Standards*, 118 FERC ¶ 61,159, FERC Stats. & Regs. ¶ 31,242 (Order No. 742).

<sup>3</sup> In its petition, NERC committed to continue addressing these directives in its standards development process.

<sup>4</sup> With respect to the EMS personnel directive, the SDT determined, based on data provided by NERC's Events Analysis group, that there was sufficient evidence to argue that EMS personnel need not be trained under the standards.

draft a standard that responded to FERC's directives. The SDT has sought to respond to FERC directives in a manner that is acceptable to industry and addresses concerns related to the scope of the training requirement. The SDT has worked diligently to draft the standard narrowly, as reflected in its responses to the questions raised at the webinar, as provided below.

Pursuant to a Notice of Extension of time granted by FERC in February 2012, NERC has until September 30, 2014 to complete Project 2010-01 pursuant to Order No. 742.<sup>5</sup>

## Questions

### **Question 1: What is the benefit of not putting certain new terms in the NERC Glossary of Terms? We believe that any definitions that are in the standards should be located in NERC Glossary of Terms.**

NERC and the SDT generally agree that when a standard uses a defined term, the defined term should be included in the NERC Glossary of Terms. However, there are situations, as is the case in PER-005-2, where terms are defined for a particular standard and such definitions are not appropriate for use across all standards. In these limited situations, the terms would be standard-specific and not be included in the NERC Glossary. As explained below, the PER-005-2 SDT created standard-specific terms that were not appropriate for wider use.

- The standard-only term "System Personnel" was created to group "System Operators," as defined in the NERC Glossary, with the local transmission control center personnel identified by the Commission in Order Nos. 693 and 742 into a single defined term so as to create a more concise and readable standard. Because the term "System Personnel" is a grouping unique to PER-005-2 rather than a definition that could be widely used in other standards, it is not appropriate to include the term in the NERC Glossary.
- The standard-only term "Operations Support Personnel" is defined to include only those support personnel identified in FERC Order Nos. 693 and No. 742 that are required to be trained under the standard. The SDT concluded that the term "Operations Support Personnel" should remain standard-specific because the definition was created as an efficient way to refer to the support personnel that were identified by FERC to be included in the standard and was not intended as a global definition that encompasses all operations support personnel.

Additionally, please note that the applicability section includes Transmission Owners (TO) and Generation Operators (GOP) that have certain type of personnel that FERC directed be trained under the standard. The standard does not modify the definition of TO or GOP set forth in the functional model; rather, the standard narrows its applicability by limiting the TOs and GOPs subject to the standard to those identified in the applicability section.

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<sup>5</sup> See Notice of Extension of Time, Docket No. RM09-25-000 (Feb. 15, 2012).

**Question 2: Why are Transmission Owners as described in PER-005-2 not registered as Transmission Operators?**

Generally, the TOs identified in PER-005-2 are registered as TOPs. However, there are some instances where there is an agreement between a TO and TOP that allows the TO to perform some TOP functions. The actions of the TO pursuant to these agreements do not require it to be registered as a TOP. TOs were added to PER-005-2 to address situations where TOs are making decisions and therefore require training. FERC is aware of these situations, which led to the directive to add TOs to the PER-005 standard.

There are several ways that a registered entity's functional responsibilities can be transferred to another entity: through an agreement or through registration – either a coordinated functional registration (CFR), or as a joint registration organization (JRO). For this standard, the objective is to ensure that personnel performing the functions are trained.

Section 501 of the NERC ROP provides that the NERC Compliance Registry (NCR) will set forth the identity and functions performed for each organization responsible for meeting requirements/sub-requirements of the Reliability Standards. A generation or transmission cooperative, a joint-action agency or another organization may register as a Joint Registration Organization (JRO), in lieu of each of the JRO's members or related entities being registered individually for one or more functions. Additionally, multiple entities may each register using a Coordinated Functional Registration (CFR) for one or more Reliability Standard(s) and/or for one or more Requirements/sub-Requirements within particular Reliability Standard(s) applicable to a specific function pursuant to a written agreement for the division of compliance responsibility.<sup>6</sup>

**Question 3: Why did the Standard Drafting Team (SDT) change the wording in the System Operator definition from “monitor and control” to “operates or directs?”**

The phrase “monitor and control” was ambiguous but at the same time narrowly focused. The SDT used the term “operates or directs” to more accurately reflect the duties performed by the System Operator. As an example, the System Operator is constantly monitoring the BES and reacting to varying system conditions, thus “operates” which incorporates the term “monitor and control.” The System Operator is again reacting to varying system conditions by modifying system configurations, generator output, transmission loadings, and guiding field personnel in the performance of their duties regarding the BES, thus “directs”, which incorporates the term “control.”

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<sup>6</sup> See section 501 of the NERC Rules of Procedure at: [http://www.nerc.com/FilingsOrders/us/RuleOfProcedureDL/NERC\\_ROP\\_Effective\\_20131004.pdf](http://www.nerc.com/FilingsOrders/us/RuleOfProcedureDL/NERC_ROP_Effective_20131004.pdf)

**Question 4: Is the definition of System Operator intended to include, let's say a General Manager who might direct an operating move to be made by personnel on the operating desk?**

This depends on the organizational structure of the entity and how it runs its part of the system. The definition was intended for operators, not managers. However, if an entity has a manager that directs NERC certified personnel in the operation of the system, then that manager should be included in the training and should be subject to PER-003-1.

**Question 5: Could you provide more details on the Transmission Owner aspect of System Personnel - BA, RC, and TOP make sense, but TOs are not as clear.**

The purpose of adding TOs to PER-005-2 is to address FERC directives from Orders Nos. 693 and 742 to develop training requirements for local transmission control center personnel. These local control center personnel are TO personnel that may not also be a TOP. See response to Question 2. The standard does not modify the definition of TO's set forth in the functional model; rather, the standard limits the TOs subject to the standard to those with the personnel identified in the applicability section.

**Question 6: Are GOPs going to be required to become NERC certified?**

PER-005-2 does not address certification. This standard focuses solely on training. PER-003-1 governs certification. Requiring GOPs to be NERC certified is not being considered as an addition to the certification standard.