

**Compliance Questionnaire and**

**Reliability Standard Audit Worksheet**

**PER-004-2 — Reliability Coordination — Staffing**

**Registered Entity:** *(Must be completed by the Compliance Enforcement Authority)*

**NCR Number:** *(Must be completed by the Compliance Enforcement Authority)*

**Applicable Function(s): RC**

**Auditors:**

**Disclaimer**

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

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

# Subject Matter Experts

Identify your company’s subject matter expert(s) responsible for this Reliability Standard. Include the person's title, organization and the requirement(s) for which they are responsible. Insert additional lines if necessary.

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

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| --- | --- | --- | --- |
| **SME Name** | **Title** | **Organization** | **Requirement** |
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# Reliability Standard Language

 **PER‑004‑2 — Reliability Coordination** — **Staffing**

**Purpose:**

Reliability Coordinators must have sufficient, competent staff to perform the Reliability Coordinator functions.

**Applicability:**

 Reliability Coordinators

**NERC BOT Approval Date:**

**FERC Approval Date:**

**Reliability Standard Enforcement Date in the United States:**

**Requirements**:

1. Each Reliability Coordinator shall be staffed with adequately trained and NERC-certified Reliability Coordinator operators, 24 hours per day, seven days per week.

**Describe, in narrative form, how you meet compliance with this requirement: *(Registered Entity Response Required)***

**Data Request**:: Provide a list of all Reliability Coordinator operators. Provide the registered name, no aliases.

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

# R1 Supporting Evidence and Documentation

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

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|  |   **Provide the following:** **Document Title and/or File Name, Page & Section, Date & Version** |
| **Title** | **Date** | **Version** |
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| *Audit Team: Additional Evidence Reviewed:* |  |  |
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***This section must be completed by the Compliance Enforcement Authority.***

**Compliance Assessment Approach Specific to PER-004-2 R1.**

 \_\_\_Review the evidence provided by the entity to determine the positions identified that require NERC Reliability Coordinator level certification.

 \_\_\_Review work schedule to determine what specific personnel worked in those positions for the entire audit period and confirm they were all certified at the Reliability Coordinator level and adequately trained per the entity's training program.

 \_\_\_Contact NERC and confirm those NERC certifications are valid for the timeframe being reviewed.

 \_\_\_Review the evidence provided by the entity to determine if all personnel who are in positions identified above have received training as required by the entity’s training program.

**Detailed notes:**

1. Reliability Coordinator operating personnel shall place particular attention on SOLs and IROLs and inter-tie facility limits. The Reliability Coordinator shall ensure protocols are in place to allow Reliability Coordinator operating personnel to have the best available information at all times.

**Describe, in narrative form, how you meet compliance with this requirement: *(Registered Entity Response Required)***

# R2 Supporting Evidence and Documentation

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

|  |  |
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|  |   **Provide the following:** **Document Title and/or File Name, Page & Section, Date & Version** |
| **Title** | **Date** | **Version** |
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| *Audit Team: Additional Evidence Reviewed:* |  |  |
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***This section must be completed by the Compliance Enforcement Authority.***

**Compliance Assessment Approach Specific to PER-004-2 R2.**

 \_\_\_Review the evidence provided by the entity to confirm that the Reliability Coordinator has evidence that it places particular attention on SOLs and IROLs and inter‑tie facility limits.

 \_\_\_Review the evidence provided by the entity to determine if there are protocols in place to allow the Reliability Coordinator operating personnel the opportunity (through the ability to request and receive additional data in a timely manner) to have the best available information at all times.

**Detailed notes:**

# Supplemental Information

**Other ‑** The list of questions above is not all inclusive of evidence required to show compliance with the Reliability Standard. Provide additional information here**, as necessary that** demonstrates compliance with this Reliability Standard.

  **Entity** **Response: *(Registered Entity Response)***

# Compliance Findings Summary (to be filled out by auditor)

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

**Excerpts from FERC Orders -- For Reference Purposes Only**

**Updated Through October 11, 2011**

**PER-004-2**

**Order 693**

P 1324. The four proposed Personnel Performance, Training and Qualifications (PER) Reliability Standards are applicable to transmission operators, reliability coordinators and balancing authorities with the intention of ensuring the safe and reliable operation of the interconnected grid through the retention of suitably trained and qualified personnel in positions that can impact the reliable operation of the Bulk-Power System. The PER Reliability Standards address: (1) operating personnel responsibility and authority; (2) operating personnel training; (3) operating personnel credentials and (4) reliability coordination staffing.

P 1410. PER-004-1 ensures that reliability coordinator personnel are adequately trained, NERC-certified and staffed 24-hours a day, seven days a week, with properly trained and certified individuals.Further, reliability coordinator operating personnel must have a comprehensive understanding of the area of the Bulk-Power System for which they are responsible.

P 1417. We find that the Reliability Standard adequately addresses reliability coordinator staffing. Accordingly, the Commission approves Reliability Standard PER-004-1….

**Order No. 742, 18 CFR Part 40 Sys. Pers. Training Reliability Stds., 133 FERC ¶ 61,159 (2011) (November 18, 2010)**

1. Under section 215 of the Federal Power Act (FPA), n1 the Commission approves two Personnel Performance, Training and Qualifications (PER) Reliability Standards, PER-004-2 (Reliability Coordination -- Staffing) and PER-005-1 (System Personnel Training), submitted to the Commission for approval by the North American Electric Reliability Corporation (NERC), the Electric Reliability Organization (ERO) certified by the Commission. The approved Reliability Standards require reliability coordinators, balancing authorities, and transmission operators to establish a training program for their system operators, verify each of their system operators' capability to perform tasks, and provide emergency operations training to every system operator. The Commission also approves NERC's proposal to retire two existing PER Reliability Standards that are replaced by the standards approved in this Final Rule.

6. In Order No. 693, the Commission also approved Reliability Standard PER-004-1. n8 This Reliability Standard requires each reliability coordinator to be staffed with adequately trained, NERC-certified operators, 24 hours a day, seven days a week. Further, PER-004-1 requires reliability coordinator operating personnel to have a comprehensive understanding of the area of the Bulk-Power System for which they are responsible.

7. In a September 30, 2009 filing (NERC Petition), n9 NERC requests Commission approval of proposed Reliability Standards PER-005-1 (System Personnel Training) and PER-004-2 (Reliability Coordination -- Staffing), which were developed in response to the Commission's directives in Order No. 693 regarding currently effective Reliability Standard PER-002-0. n10 NERC seeks to concurrently retire currently effective Reliability Standards PER-002-0 and PER-004-1 upon the effective date of the two new Reliability Standards.

Proposed Reliability Standard PER-004-2

10. Proposed Reliability Standard PER-004-2 modifies PER-004-1 by deleting Requirements R2, R3, and R4, as these three Requirements are incorporated into proposed PER-005-1. Proposed Reliability Standard PER-004-2 simply carries forward, unchanged, the remaining provisions from currently effective PER-004-1, including the associated violation risk factor and violation severity level assignments.

16. The Commission adopts the NOPR proposal and approves Reliability Standard PER-004-2 and PER-005-1 as just, reasonable, not unduly discriminatory or preferential, and in the public interest. n17 By assigning a significant amount of structure to the training programs for the principal operators of the Bulk-Power System, namely reliability coordinators, balancing authorities and transmission operators, the two proposed Reliability Standards will enhance the reliability of the Bulk-Power System. Moreover, the two proposed Reliability Standards represent a step forward in implementing a key recommendation from the 2003 Blackout Report n18 [\*\*16] by addressing an identified gap where operations personnel were not adequately trained to maintain reliable operation under emergency conditions.

17. The Commission is not directing any modifications to the substantive requirements of the two new Reliability Standards, PER-005-1 or PER-004-2. Nevertheless, as discussed in greater detail below, the Commission has several concerns regarding certain training issues. To address these concerns, and as discussed in greater detail below, the Commission is issuing directives that the ERO: (1) consider the necessity of developing an implementation plan for entities that become subject to PER-005-1, Requirement R3.1 after Requirement R3.1 is in effect, and (2) develop a Reliability Standard, through the ERO's Reliability Standards development process, conducted pursuant to its Standard Processes Manual, establishing training requirements for local transmission control center operator personnel.

22. The Commission finds that the proposed staggered implementation schedule for PER-005-1 and PER-004-2 and the corresponding retirement schedule for PER-002-0 and PER-004-1 strikes a reasonable balance between the need for timely reform and the needs of the entities that will be subject to PER-005-1 to develop and implement training programs utilizing a systematic approach to training and use of simulators as a training tool. The effective and retirement date table provided by NERC in its comments and incorporated herein as Appendix B demonstrates that there are no apparent overlaps or gaps between the retirement of PER-002-0 and PER-004-1 and the effectiveness of the requirements in the [\*\*22] new Reliability Standards, PER-005-1 and PER-004-2.

23. The Commission finds that the commenters that advocate for a uniform effective date of 36 months have not adequately justified such a lengthy lead time for a Reliability Standard that will not impose entirely new requirements. Rather, PER-005-1 requires applicable entities to build upon and improve the existing training programs that are in place under currently effective PER-002-0. Accordingly, as approved, PER-004-2 in its entirety and PER-005-1, Requirement R3 shall become effective on the first day of the first calendar quarter after regulatory approval. n22 PER-005-1, Requirements R1, R1.1, R1.1.1, R1.2, R1.3, R1.4, R2, and R2.1 shall become effective on the first day of the first calendar quarter, twenty-four months after regulatory approval. And, finally, PER-005-1, Requirements R3.1 shall become effective on the first day of the first calendar quarter, thirty-six months after regulatory approval.

30. Based on NERC's explanation, the Commission agrees that [\*\*29] the existing requirements contained in PER-004-1, which require reliability coordinators to have a comprehensive understanding of the reliability coordinator area and interactions with neighboring reliability coordinator areas and an extensive understanding of the balancing authorities, transmission operators, and generation operators within the reliability coordinator area, are adequately captured and enforceable under proposed Reliability Standard PER-005-1.

**Revision History**

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| **Version** | **Date** | **Reviewers** | **Revision Description** |
| 1 | September 2011 | QRSAW WG | Original Document. |
| 1 | October 11, 2011 | NERC Legal | Updated Excerpts from FERC Orders from March 21, 2009 through and including October 11, 2011. |
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