

**Comment Form
Proposed System Personnel Training Standard**

This form is to be used to submit comments on the proposed System Personnel Training Standard Authorization Request. Comments must be submitted by **March 20, 2006**. You may submit the completed form by e-mailing it to: sarcomm@nerc.com with the words "System Personnel Training SAR Comments" in the subject line. If you have questions please contact Mark Ladrow at mark.ladrow@nerc.net on 609-452-8060.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

- DO: **Do** enter text only, with no formatting or styles added.
 Do use punctuation and capitalization as needed (except quotations).
 Do use more than one form if responses do not fit in the spaces provided.
 Do submit any formatted text or markups in a separate WORD file.

- DO NOT: **Do not** insert tabs or paragraph returns in any data field.
 Do not use numbering or bullets in any data field.
 Do not use quotation marks in any data field.
 Do not submit a response in an unprotected copy of this form.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> MRO	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> RFC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SERC	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	

Comment Form – Proposed System Personnel Training Standard

Group Comments (Complete this page if comments are from a group.)
Group Name: Midwest Reliability Organization (MRO)
Lead Contact: Dick Pursley
Contact Organization: MRO for group (Great River Energy for lead contact)
Contact Segment: 2
Contact Telephone: (763) 241-2249
Contact E-mail: dpursley@grenergy.com

Additional Member Name	Additional Member Organization	Region*	Segment*
Al Boesch	NPPD	MRO	2
Terry Bilke	MISO	MRO	2
Robert Coish	MHEB	MRO	2
Dennis Florom	LES	MRO	2
Ken Goldsmith	Alliant Energy	MRO	2
Todd Gosnell	OPPD	MRO	2
Wayne Guttormson	SPC	MRO	2
Tom Mielnik	MEC	MRO	2
Jim Maenner	WPSC	MRO	2
Pam Oreschnick	XEL	MRO	2
Dave Rudolph	BEPC	MRO	2
Darrick Moe, Chair	WAPA	MRO	2
Joe Knight, Secretary	MRO	MRO	2
27 Additional MRO Members	Companies not named above	MRO	2

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

Background Information:

Posted for comments is the second draft of the System Personnel Training Standard Authorization Request (SAR). The approach proposed in this revised SAR is to be flexible to the industry in determining their unique training needs and not try to force a single set of training topics on a widely diversified audience. Rather than a “one-size fits all” list of requirements, this approach is based on the fact that quality training results from applying a systematic approach to training that includes training needs assessment, training development, delivery, and evaluation. The standard will provide the framework for a training program based on the tasks performed that impact reliability.

The requestor would like to gauge the level of consensus regarding the revised SAR and to obtain the input of the industry on the scope and applicability of the proposed standards. Accordingly, your comments included on this form, e-mailed with the subject “System Personnel Training SAR Comments” by March 20, 2006, would be appreciated.

Comment Form – Proposed System Personnel Training Standard

Regarding the scope of the SAR:

The SAR Drafting Team is proposing that this SAR will result in two standards:

- One standard will require training all personnel who perform 'real-time operating tasks' that directly impact the reliability of the Bulk Electric System (BES)
- One standard will require training personnel who perform 'support tasks' that directly impact reliability of the BES.

The SAR Drafting Team wants to develop the standard for the personnel who perform 'real-time operating tasks' first, then develop the standard for personnel who perform 'support tasks'.

1. Do you agree with the approach to the training standard to limit the scope of the initial standard to persons performing real-time operating tasks that directly impact reliability of the BES?

Yes

No

Comments

Regarding the applicability identified in the SAR:

For the Standard that will apply to the personnel who perform 'real-time' operating tasks, the SAR Drafting Team is proposing that the 'Operating Tasks Analysis' being conducted by the NERC Personnel Subcommittee serve as the basis for determining which types of organizations will be required to comply with the standard.

2. Do you agree with the SAR Drafting Team's approach to determining which types of organizations will be required to comply with the standard for personnel who perform 'real-time' operating tasks?

Yes

No

Comments

However, NERC needs to seriously address the accuracy and usability of the Functional Model.

Comment Form – Proposed System Personnel Training Standard

For the Standard that will apply to the personnel who perform 'support tasks', the SAR Drafting Team is proposing that an 'Operations Support Task Analysis' planned for development by the NERC Personnel Subcommittee serve as the basis for determining which support tasks directly impact reliability of the BES and for determining which types of organizations will be required to comply with the standard.

- 3. Do you agree with the approach proposed above to determine which support tasks directly impact reliability of the BES and for determining which types of organizations will be required to comply with the standard?**

Yes

No

Comments

Regarding the Focus of the Proposed SAR

The SAR Drafting Team proposes that the training standards require the use of a 'systematic' approach to developing training. The 'systematic' approach requires the following:

1. **Determining the needs for training** through a task analysis or job and task analysis process, followed by a training needs assessment. This step enables the organization to know what training its operators need.
2. **Designing and adjusting the training program** to make sure it directly correlates performance requirements, learning objectives, and learning evaluation to tasks. The training program must be designed to bring the system operators from their current level of competency to the organization's desired level of competency.
3. **Developing the training program** so that it includes effective learning experiences and delivery methods. The approach to this step, as well as step 2, will drive the requirements for training and operating staffs.
4. **Delivering the training to the personnel**; in other words, ensure that the training actually takes place as designed.
5. **Verifying and documenting the competency** that the personnel achieved through a documented assessment process

4. **Do you agree with the SAR Drafting Team that the training standards should require use of the 'systematic' approach to training as opposed to requiring specific topics be taught to all personnel for a specific number of hours?**

Yes

No

Comments

The concern we have with a "systematic" approach is training that is required in areas where Operator exposure in real time is sporadic (e.g. disturbances, restoration, frequency arrest, voltage collapse) may be sacrificed. A "systematic" approach in our view will tend to concentrate more on supporting daily operating functions, and ignore keeping Operators familiar with abnormal operations which is critical to maintaining the BES. Unfortunately a "systematic" approach has challenges in the compliance world whereas a specific number of hours is measurable and can easily fit in the compliance world.

Comment Form – Proposed System Personnel Training Standard

The SAR Drafting Team proposes that the training standard should not include a list of required training topics, because any list of training topics would not be applicable to all entities. Instead, the SAR Drafting Team proposes that each entity provide training to support competent performance of all reliability-related real-time tasks performed within that entity. The final determination of what tasks are performed within each entity, and therefore what tasks must be addressed in the training program needs to be determined by each entity.

5. Do you agree with the approach to a training standard that requires each entity to determine their specific training needs?

Yes

No

Comments

6. Please provide any additional comments on the revised SAR that you haven't already provided above.

Comments

It appears that this SAR is not a new standard as checked under SAR type on SAR-1 but is actually a revision to existing standard PER-002-0. The PER-002-0 standard would appear to be redundant and not needed after this standard has been developed. We are very pleased about the NERC Personnel Subcommittee's interest and efforts to clarify and develop standards concerning training of support personnel. We also applaud the responsiveness of the System Personnel Training SAR Drafting Team to the initial concerns with the first draft of the SAR.