

Unofficial Comment Form for Operating Personnel Credentials Standard (Project 2007-04)

Please **DO NOT** use this form. Please use the [electronic comment form](#) located at the link below to submit comments on the draft Operating Personnel Credentials standard. Comments must be submitted by **November 20, 2009**. If you have questions please contact **Darrel Richardson** at Darrel.Richardson@nerc.net or by telephone at 609-613-1848.

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

Background Information:

The Operating Personnel Credentials standard is designed to ensure that System Operators performing the reliability-related tasks of the Reliability Coordinator, Balancing Authority and Transmission Operator have demonstrated competency through the Certification Process when filling the operating position responsible for control of the Bulk Electric System. This standard will replace standard PER-003-0 once it is approved by the appropriate entities. The focus of this standard has been to provide greater clarity in who exactly needs to be certified and what certificate is needed to operate the Bulk Electric System as a Reliability Coordinator, Balancing Authority or Transmission Operator.

The Drafting Team would like to receive industry comments on this standard. Accordingly, we request that you include your comments on this form by **November 20, 2009**.

- 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.

Yes

No

Comments: 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.

- 2. 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.

Yes

No

Comments:

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.

Yes

No

Comments:

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 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.

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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 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. 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.

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.

Yes

No

Comments:

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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

- Reliability Operator
- Balancing, Interchange and Transmission Operator
- Transmission Operator

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 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.

5. Requirement R3 of the draft standard reads:

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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.

Yes

No

Comments:

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

- Reliability Operator
- Balancing, Interchange and Transmission Operator
- Balancing and Interchange Operator

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 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

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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 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.

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

Yes

No

Comments:

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.

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.

Yes

No

Comments:

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.

Yes

No

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Comments:

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

Yes

No

Comments:

10. 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:

- A. Certification ensures that System Operators with responsibility for real-time operations have a minimum level of knowledge that assists in their achieving reliable operations. As the ERO, NERC has responsibility for ensuring the real-time operation of the Bulk Electric System. Passing a certification examination is NERC's only available method to verify the minimum knowledge level of a System Operator.
- B. While a concern was expressed about experienced system operators not being able to pass an examination, there was no evidence provided to support this concern.

The SDT researched a sample of actual industry experience with the NERC System Operator Certification pass rates. The SDT members work within the industry and are associated with control centers across three North American Interconnections; therefore, researching the pass rates within their own organizations provides a valid sampling across the industry. The results of the survey are reflected in the following table.

System Operator Passing Rates			
Operators that took a NERC Certification Exam	Operators that successfully passed a NERC Certification Exam	Operators that required more than one attempt to pass a NERC Certification Exam	Operator with previous experience operating the BES unable to pass a NERC Certification Exam
200	196	14	0

These results led the SDT to the conclusion that the concern about experienced operators being unable to pass a NERC Certification exam were not well founded, when considering a sampling across the industry.

Grandfathering would greatly diminish the validity and defensibility of the NERC System Operator Certification Program. In doing the research, the SDT was unable to find evidence that the grandfathering would have a positive impact on either the NERC Certification Program or the reliability of the Bulk Electric System.

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- C. A concern was raised that industry employers may have labor relations issues due to requiring portions of their workforce to hold a NERC System Operator Certification.

PER-003-1 applicability impacts the population of System Operators that are already NERC certified under PER-003-0. There should not be a large scale scope change impacting non-NERC certified personnel. Overall labor relations issues that arose due to the NERC System Operator Certification requirements have, for the most part, already been settled.

There are several members on the SDT that have had experience with the NERC System Operator Certification requirement being imposed on bargaining unit personnel within their organization. Their experience has been that it did open some discussion between management and the collective bargaining entity, but it was resolved equitable within their organizations. Most collective bargaining agreements have some provision that addresses regulatory or legal changes that affect the organization personnel.

- D. Another concern was raised about small industry entities retaining personnel within their organization once they have become better qualified by obtaining a NERC System Operator Certification. The concern appears to be that the System Operators would become more “marketable” and would possibly be enticed to leave smaller organizations to join larger organizations that typically have a higher pay scale.

As stated above, the target population for NERC System Operator Certification already holds a NERC Certification. There will not be a significant number of individuals who will become immediately more marketable than they were previously.

The NERC System Operator Certification Program is designed to ensure that System Operators who are making decisions impacting the operation of the Bulk Electric System have at least a minimum knowledge level. Whether a System Operator works for a large or small entity, verifying their minimum knowledge level has a very positive impact on the Bulk Electric System reliability. While personnel retention is an issue within the industry, reducing requirements on verifying and improving the capabilities of System Operators is not an appropriate corrective action.

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

Yes

No

Comments:

The MRO NSRS agrees that grandfathering should not be allowed as a replacement for a valid NERC certification.

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.

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Yes

No

Comments:

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 § 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.

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.

13. 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.

Comments: