

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

Please **DO NOT** use this form. Please use the [electronic form](#) located at the link below to submit comments on the draft Operating Personnel Credentials standard. Comments must be submitted by **September 24, 2010**. If you have questions please contact **Darrel Richardson** at [Darrel.Richardson@nerc.net](mailto:Darrel.Richardson@nerc.net) or by telephone at 609-613-1848.

[http://www.nerc.com/filez/standards/Certifying\\_SOs\\_Project\\_2007-04.html](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 or Transmission Operator have demonstrated minimum competency through the NERC Certification Process when in an 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 is to provide greater clarity in who exactly needs to be certified and what certificate is needed to operate the Bulk Electric System for those System Operators who work for an entity registered as a Reliability Coordinator, Balancing Authority or Transmission Operator. The Standard Drafting Team has responded to comments on an initial draft of the standard and has modified the draft standard.

The Drafting Team would like to receive industry comments on this standard. Accordingly, we request that you include your comments on the electronic form and submit them by **September 24, 2010**.

## Unofficial Comment Form — Operating Personnel Credentials Standard

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1. The SDT has modified the Purpose statement of the draft standard. The Purpose statement now reads “To ensure that System Operators performing the reliability-related tasks of the Reliability Coordinator, Balancing Authority or Transmission Operator are certified through the NERC System Operator Certification Program when filling a Real-time operating position responsible for control of the Bulk Electric System”.

Do you agree that the modified Purpose statement provides greater clarity as to who is affected and how certification is to be accomplished? If not, please explain in the comment area.

Yes

No

Comments:

2. Although the industry as a whole did not request additional time for the implementation of this standard, the SDT responded to those entities that requested additional time. The SDT determined that there may be instances where existing certificate holders may need to obtain a different certificate, and, consequently, modified the effective date of the draft standard to be twelve months after regulatory approval/or BOT approval where there is no regulatory approval required.

Do you agree that this additional time is sufficient for all entities to comply with the standard? If not, please explain in the comment area.

Yes

No

Comments:

3. The SDT has modified the body of all three Requirements to provide additional clarity as to who is to be certified. The body of the Requirement(s) now reads:

“Each [operating entity] shall staff its Real-time operating positions performing [operating entity] reliability-related tasks with System Operators who have demonstrated minimum competency in the areas listed by obtaining and maintaining one of the following valid NERC certificates:”.

Do you agree that this modification clearly states who is to be certified and clarifies that the obtaining and maintaining the certificate is how competence is demonstrated? If not, please explain in the comment area.

Yes

No

Comments:

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.

4. The SDT has modified the Measure to better align with the Requirement(s). The Measure now reads “Each Reliability Coordinator, Transmission Operator and Balancing Authority shall have the following evidence to show that it staffed its Real-time operating positions performing reliability-related tasks with System Operators who have demonstrated the applicable minimum competency by obtaining and maintaining the appropriate, valid NERC certificate (R1, R2, R3):
- M1.1 A list of Real-time operating positions.
  - M1.2 A list of System Operators assigned to its Real-time operating positions.
  - M 1.3 A copy of each of its System Operator’s NERC certificate or NERC certificate number with expiration date.
  - M 1.4 Work schedules, work logs, or other equivalent evidence showing which System Operators were assigned to work in Real-time operating positions.

Do you agree that the Measure is now better aligned with the Requirement(s)? If not, please explain in the comment area.

- Yes  
 No

Comments:

5. 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:

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.