

**Comment Form — SAR to Revise PER-003, Operating Personnel Credentials
 (Project 2007-04)**

Please use this form to submit comments on the proposed SAR to revise PER-003, Operating Personnel Credentials (Project 2007-04). Comments must be submitted by **January 31, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "Operating Personnel Credentials" in the subject line. If you have questions please contact Darrel Richardson at darrel.richardson@nerc.net or by telephone at (609) 613-1848.

Individual Commenter Information (Complete this page for comments from one organization or individual.)		
Name:	William J. Smith	
Organization:	Allegheny Power	
Telephone:	(724) 838-6552	
E-mail:	wsmith1@alleghenypower.com	
NERC Region (check all Regions in which your company operates)		Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input checked="" type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Background Information

In response to stakeholder comments, the Certifying System Operators SAR Drafting Team modified the Certifying System Operators SAR to clarify that the proposed revisions to PER-003 **will not** include requirements for certification of generator operators or local control center operators.

Because these changes are significant, the Standards Committee directed the SAR DT to post the revised SAR for another comment period. Please review the revised SAR and then answer the following question, using this form. Please e-mail the form to sarcomm@nerc.net with the subject "Operating Personnel Credentials" by **Thursday, January 31, 2008**.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

- 1. Do you agree with the modifications made to the SAR to eliminate any requirements for NERC certification of generator operators and local control center operators? If not, please explain in the comment area.**

- Yes
 No

Comments: Allegheny Power agrees with the modifications that eliminates the applicability of this standard to GOPs and LCCs. However NERC should specify that it is the responsibility of the ISO/RTOs to certify those entities. The minimum requirements for those certification program should be specified in a NERC Standard to ensure consistant certification through out the entire grid for those entities.

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Individual Commenter Information (Complete this page for comments from one organization or individual.)		
Name:	Kirit S. Shah	
Organization:	Ameren	
Telephone:	(314)554-3542	
E-mail:	kshah@ameren.com	
NERC Region (check all Regions in which your company operates)	Registered Ballot Body Segment (check all industry segments in which your company is registered)	
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
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1. Do you agree with the modifications made to the SAR to eliminate any requirements for NERC certification of generator operators and local control center operators? If not, please explain in the comment area.

- Yes
- No

Comments: Generator Operators, Transmission Operators, Balancing Authority Operators, and Reliability Coordinators have the primary responsibility for the real-time reliability of the Bulk Electric System. Each of these entities must have provincial knowledge of their systems AND must have knowledge of how their systems fit in with the overall interconnected system*. While it seems nice to think that TOPs, BAs, and RCs can effectuate presumptive actions at a GOP, there is no doubt that most such actions are, in fact, responsive. It is precisely for this reason that NERC certifications exist. And if certifications are necessary for TOP, BA, and RCs then it should be needed for GOP. However, it is equally clear that the current certifications (which have, for all intents and purposes, been in place before the functional model was developed) do not offer a Generator Operator certification that is appropriate for the requirements put forth in the NERC standards and needed for all Generator Operators. Rather than remove the certification requirement for GOPs, it is incumbent to develop the PROPER certification for GOPs. Such certification should only include generation systems and their impact on the Bulk Electric System. We envisage that such certification would entail perhaps 1/3 of the material in a BA/TOP certification and would carry with it a reduced set of certification hours, perhaps 50-90 hours of renewal training accumulated over three years for the review of Standards and Bulk Electric System concepts. We would also expect that each GO would determine, based on their organizational structure, for which positions certification is appropriate.

*TOPs, BAs, and RCs do not know what traps may be created by a GOP(until it is too late). For example, a GOP might be having difficulty with a control function which is limiting output to less than maximum. The problem seems to be related to frequency response. Is there a possibility that a unknowing GOP would disable the droop component to maximize output until they can get the control problem fixed? If yes, such action would then obviously undermine BES reliability. Having the GOP function certified would obviate this.

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Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	Thad K. Ness
Organization:	AEP
Telephone:	614-716-2053
E-mail:	tkness@aep.com
NERC Region (check all Regions in which your company operates)	Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input checked="" type="checkbox"/> ERCOT	<input checked="" type="checkbox"/> 1 — Transmission Owners
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- Yes
 No

Comments: Due to the potential impact of a Generation Operator's actions on the ability of the other Functional Entities to perform their functions in maintaining reliable operation of the Bulk Electric System, it would be appropriate to include NERC certification for the Generator Operator. In developing the Generator Operator certification, it should be understood that the need for maintaining at least a high level of demonstrated understanding of the effect of each Functional Entity's impact on the other reliability functions. From the real-time reliable operating perspective, the related impact for maintaining reliability among the responsible Functional Entities cannot be separated, because of the inherent effect each one has on the other.

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Chris Norton	
Organization:	American Municipal Power - Ohio, Inc.	
Telephone:	(614)337-6222	
E-mail:	cnorton@amp-ohio.org	
NERC Region (check all Regions in which your company operates)		Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
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- Yes
 No

Comments: AMP-Ohio agrees with eliminating the current requirements as they currently apply to generator operators. To the extent that a certification or training standard is applied to generator operators it should be tailored to the functions and activities that generator operators actually conduct. Generator operator personnel should not be required to test on detailed functions and activities that take place at the Reliability Coordinator, Balancing Authority or Transmission Operator. In other words generator operators should not be required to pass the balancing authority, transmission operator or reliability coordinator test. A new test should be developed that is targeted towards generator operators and the functions they actually perform.

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Individual Commenter Information (Complete this page for comments from one organization or individual.)		
Name:	Jason Shaver	
Organization:	American Transmission Co.	
Telephone:	262 506 6885	
E-mail:	jshaver@atcllc.com	
NERC Region (check all Regions in which your company operates)	Registered Ballot Body Segment (check all industry segments in which your company is registered)	
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
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- Yes
 No

Comments: ATC believes that any system operator who is allowed to take independent action on the bulk power system should be NERC certified.

By removing this provision from the SAR is the Standard Drafting Team saying that local control center's system operators do not take independent action on the bulk power system?

If this is the case then we agree with the changes to the SAR.

Additional comments:

Issue 1:

The SAR needs to be expanded to include NERC Standards PER-001 and PER-002. Doing so is the only way to insure the development of a comprehensive set of personnel standards.

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	John Neagle	
Organization:	Associated Electric Cooperative Inc.	
Telephone:	(417) 885-9233	
E-mail:	jneagle@aeci.org	
NERC Region (check all Regions in which your company operates)	Registered Ballot Body Segment (check all industry segments in which your company is registered)	
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
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Comment Form — Certifying System Operators SAR (Project 2007-04)

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region *	Segment *

*If more than one Region or Segment applies, please list all that apply. Regional acronyms and segment numbers are shown on prior page.

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Yes

No

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Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	Allen Czerkiewicz
Organization:	Northern Star Generation services, Inc.
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E-mail:	allen.czerkiewicz@nsgen.com
NERC Region (check all Regions in which your company operates)	Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 – Transmission Owners
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Contact Segment:

Contact Telephone:

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- Yes
 No

Comments: The Certifying System Operators Drafting Team properly deleted the originally-proposed requirement for certification of generator operators and local control center operators. There is no justification for any such requirement. First, there has been no NERC proceeding establishing whether there is any need for such uniform certification. Second, the original PER-003 certification proposal was the subject of a great deal of disagreement within the industry, and presented a litany of implementation difficulties, which FERC recognized in Order No. 693 (at para. 1395); in fact, the FERC acknowledged that certain elements of the proposed personnel certification plan presented implementation difficulties, and did not originally propose to require generator operator personnel to be NERC-certified (at para. 1407). Third, the PER-003 proposed certifications were never agreed to by a consensus of the Bulk Power System Users. Fourth, the usefulness of any such certification requirement is questionable, particularly since the physical equipment, communications systems, and controls in place at different generators widely differs. The captioned filers strongly support the modifications made to the SAR to eliminate any requirements for NERC certification of generator operators and local control center operators.

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Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	J. Andrew Dodge
Organization:	Baltimore Gas and Electric Company
Telephone:	410-597-7210
E-mail:	JAndrew.Dodge@bge.com
NERC Region (check all Regions in which your company operates)	Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/> 1 — Transmission Owners
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- Yes
 No

Comments: We recommend that the revised standard be clear as to who is responsible at the requirement level as well. For example, Transmission Operator delegated tasks to Transmission Owners/Local Control Centers should not require Transmission Owner System Operators to be NERC certified. The Transmission Operator should be responsible for ensuring that the Transmission Owner/Local Control Center System Operators are qualified to perform their delegated tasks.

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Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	Tony Kroskey
Organization:	Brazos Electric Power Cooperative
Telephone:	254-750-6357
E-mail:	tkroskey@brazoselectric.com
NERC Region (check all Regions in which your company operates)	Registered Ballot Body Segment (check all industry segments in which your company is registered)
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Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	Brad Calhoun
Organization:	CenterPoint Energy
Telephone:	713-207-2744
E-mail:	brad.calhoun@CenterPointEnergy.com
NERC Region (check all Regions in which your company operates)	Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input checked="" type="checkbox"/> ERCOT	<input checked="" type="checkbox"/> 1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/> 2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/> 3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/> 4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/> 5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/> 6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/> 7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/> 8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/> 9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/> 10 — Regional Reliability Organizations and Regional Entities

Background Information

In response to stakeholder comments, the Certifying System Operators SAR Drafting Team modified the Certifying System Operators SAR to clarify that the proposed revisions to PER-003 **will not** include requirements for certification of generator operators or local control center operators.

Because these changes are significant, the Standards Committee directed the SAR DT to post the revised SAR for another comment period. Please review the revised SAR and then answer the following question, using this form. Please e-mail the form to sarcomm@nerc.net with the subject "Operating Personnel Credentials" by **Thursday, January 31, 2008**.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

- 1. Do you agree with the modifications made to the SAR to eliminate any requirements for NERC certification of generator operators and local control center operators? If not, please explain in the comment area.**

- Yes
 No

Comments: CenterPoint Energy strongly believes that the proposed modifications to the SAR are appropriate and consistent with FERC's determination in Order No. 693 paragraph 1407 "not to require generator operators and transmission operators at local control centers to be NERC Certified at this time".

**Comment Form — SAR to Revise PER-003, Operating Personnel Credentials
 (Project 2007-04)**

Please use this form to submit comments on the proposed SAR to revise PER-003, Operating Personnel Credentials (Project 2007-04). Comments must be submitted by **January 31, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "Operating Personnel Credentials" in the subject line. If you have questions please contact Darrel Richardson at darrel.richardson@nerc.net or by telephone at (609) 613-1848.

Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	Alan Gale
Organization:	City of Tallahassee
Telephone:	(850) 891-3025
E-mail:	alan.gale@talgov.com
NERC Region (check all Regions in which your company operates)	Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 – Transmission Owners
<input checked="" type="checkbox"/> FRCC	<input type="checkbox"/> 2 – RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/> 3 – Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/> 4 – Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input checked="" type="checkbox"/> 5 – Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/> 6 – Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/> 7 – Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/> 8 – Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/> 9 – Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/> 10 – Regional Reliability Organizations and Regional Entities

Background Information

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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

- 1. Do you agree with the modifications made to the SAR to eliminate any requirements for NERC certification of generator operators and local control center operators? If not, please explain in the comment area.**

Yes

No

Comments:

**Comment Form — SAR to Revise PER-003, Operating Personnel Credentials
 (Project 2007-04)**

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Steve Rose	
Organization:	City Water Light & Power	
Telephone:	217-321-1392	
E-mail:	steve.rose@cwlp.com	
NERC Region (check all Regions in which your company operates)		Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input checked="" type="checkbox"/> SERC	<input checked="" type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input checked="" type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Comment Form — Certifying System Operators SAR (Project 2007-04)

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region*	Segment*

*If more than one Region or Segment applies, please list all that apply. Regional acronyms and segment numbers are shown on prior page.

Background Information

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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree with the modifications made to the SAR to eliminate any requirements for NERC certification of generator operators and local control center operators? If not, please explain in the comment area.

- Yes
- No

Comments: Transmission Operators, Balancing Authority Operators, Reliability Coordinators, and Generator Operators must have knowledge of these systems and the Bulk Electric System. TOP, BA, and RCs NERC Certification should also extend to GOP. A proper certification for GOP is needed rather than remove the certification requirement for GOP's. In an effort to reduce the burden of GOP certification on the entire Bulk Electric System the proper GOP certification should also have a requirement of a generator capacity connected to the Bulk Electric System. For example all generators at 100 MW or greater would be required to have the new GOP NERC Certification. The new GOP requirement would also extend to generators less than 100 MW that are determined to be "Critical Generators" or "Black Start Units" by Transmission Owner, Balancing Authority, Reliability Coordinator and NERC Region to the Bulk Electric System. All other smaller generators would be excluded from the GOP NERC Certification. The PROPER GOP Certification requirement would achieve a higher level of competency and increase the level Bulk Electric System situational awareness by the GOP which is the intent of the NERC Standards.

**Comment Form — SAR to Revise PER-003, Operating Personnel Credentials
 (Project 2007-04)**

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Karl Kohlrus	
Organization:	City Water, Light & Power	
Telephone:	217-321-1391	
E-mail:	karl.kohlrus@cwlp.com	
NERC Region (check all Regions in which your company operates)		Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input checked="" type="checkbox"/> SERC	<input checked="" type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Comment Form — Certifying System Operators SAR (Project 2007-04)

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region *	Segment *

*If more than one Region or Segment applies, please list all that apply. Regional acronyms and segment numbers are shown on prior page.

Background Information

In response to stakeholder comments, the Certifying System Operators SAR Drafting Team modified the Certifying System Operators SAR to clarify that the proposed revisions to PER-003 **will not** include requirements for certification of generator operators or local control center operators.

Because these changes are significant, the Standards Committee directed the SAR DT to post the revised SAR for another comment period. Please review the revised SAR and then answer the following question, using this form. Please e-mail the form to sarcomm@nerc.net with the subject "Operating Personnel Credentials" by **Thursday, January 31, 2008**.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree with the modifications made to the SAR to eliminate any requirements for NERC certification of generator operators and local control center operators? If not, please explain in the comment area.

Yes

No

Comments: I agree with the changes to eliminate the requirements for NERC certification of generator operators, but not for eliminating the requirement for certification of local control system operators.

There are many sizes and types of generator operators. Where would you draw the line? Voltage? Size? Type? Our system has a 128 MW generator connected to the 138 kV system, whereas a neighbor has a 260 MW generator connected to the 69 kV system. There are thousands of personnel who operate various sizes and types of generators. Requiring NERC certification for all of them would be an administrative burden and not add to reliability.

Certifying local control center operators, however, should be kept. Most problems start and are addressed locally. If untrained personnel are operating the system, this could result in reliability problems. For example, the 24 BAs in MISO, many of which are also TOPs, will be operating as Local Balancing Authorities after the MISO Ancillary Services Market begins operation. If a local TOP operates 100 kV or higher facilities, that person should be certified.

**Comment Form — SAR to Revise PER-003, Operating Personnel Credentials
 (Project 2007-04)**

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Individual Commenter Information (Complete this page for comments from one organization or individual.)		
Name:	Russell A. Noble	
Organization:	Cowlitz County PUD No. 1	
Telephone:	360-577-7541	
E-mail:	rnoble@cowlitzpud.org	
NERC Region (check all Regions in which your company operates)		Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input checked="" type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Comment Form — Certifying System Operators SAR (Project 2007-04)

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region *	Segment *

*If more than one Region or Segment applies, please list all that apply. Regional acronyms and segment numbers are shown on prior page.

Background Information

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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

- 1. Do you agree with the modifications made to the SAR to eliminate any requirements for NERC certification of generator operators and local control center operators? If not, please explain in the comment area.**

Yes

No

Comments:

**Comment Form — SAR to Revise PER-003, Operating Personnel Credentials
 (Project 2007-04)**

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Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	Jalal Babik
Organization:	Dominion Resources Inc.
Telephone:	8042734109
E-mail:	Jalal.Babik@dom.com
NERC Region (check all Regions in which your company operates)	Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/> 2 — RTOs and ISOs
<input checked="" type="checkbox"/> MRO	<input type="checkbox"/> 3 — Load-serving Entities
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/> 4 — Transmission-dependent Utilities
<input checked="" type="checkbox"/> RFC	<input checked="" type="checkbox"/> 5 — Electric Generators
<input checked="" type="checkbox"/> SERC	<input type="checkbox"/> 6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/> 7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/> 8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/> 9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/> 10 — Regional Reliability Organizations and Regional Entities

Comment Form — Certifying System Operators SAR (Project 2007-04)

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region *	Segment *

*If more than one Region or Segment applies, please list all that apply. Regional acronyms and segment numbers are shown on prior page.

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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

- 1. Do you agree with the modifications made to the SAR to eliminate any requirements for NERC certification of generator operators and local control center operators? If not, please explain in the comment area.**

Yes

No

Comments:

**Comment Form — SAR to Revise PER-003, Operating Personnel Credentials
 (Project 2007-04)**

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Greg Rowland	
Organization:	Duke Energy	
Telephone:	704-382-5348	
E-mail:	gdrowland@dukeenergy.com	
NERC Region (check all Regions in which your company operates)		Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
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<input checked="" type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Comment Form — Certifying System Operators SAR (Project 2007-04)

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region*	Segment*

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Yes

No

Comments:

**Comment Form — SAR to Revise PER-003, Operating Personnel Credentials
 (Project 2007-04)**

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Individual Commenter Information (Complete this page for comments from one organization or individual.)		
Name:	Greg Mason	
Organization:	Dynergy	
Telephone:	217 872-2301	
E-mail:	gregory.mason@dynergy.com	
NERC Region (check all Regions in which your company operates)	Registered Ballot Body Segment (check all industry segments in which your company is registered)	
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input checked="" type="checkbox"/> RFC	<input checked="" type="checkbox"/>	5 — Electric Generators
<input checked="" type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

- 1. Do you agree with the modifications made to the SAR to eliminate any requirements for NERC certification of generator operators and local control center operators? If not, please explain in the comment area.**

- Yes
 No

Comments: The Certifying System Operators SAR Drafting Team correctly cited FERC Order 693 and the NERC Functional Model Version 3 definitions as key reasons for eliminating any requirements for NERC certification of generator operators and local control center operators.

**Comment Form — SAR to Revise PER-003, Operating Personnel Credentials
 (Project 2007-04)**

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Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	H. Vann Weldon
Organization:	ERCOT Inc.
Telephone:	512-248-3133
E-mail:	vweldon@ercot.com
NERC Region (check all Regions in which your company operates)	Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input checked="" type="checkbox"/> ERCOT	<input type="checkbox"/> 1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/> 2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/> 3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/> 4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/> 5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/> 6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/> 7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/> 8 — Small Electricity End Users
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	<input type="checkbox"/> 10 — Regional Reliability Organizations and Regional Entities

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Yes

No

Comments:

**Comment Form — SAR to Revise PER-003, Operating Personnel Credentials
 (Project 2007-04)**

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Chris Scanlon	
Organization:	Exelon	
Telephone:	630-576-6926	
E-mail:	christopher.scanlon@exeloncorp.com	
NERC Region (check all Regions in which your company operates)		Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
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<input checked="" type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Background Information

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- 1. Do you agree with the modifications made to the SAR to eliminate any requirements for NERC certification of generator operators and local control center operators? If not, please explain in the comment area.**

Yes

No

Comments:

FERC final Rule 693 does not require certification for Local Control Center Transmission Owner / Operators or Generation Plant or Control Center Operators. Under Commission Determination, Paragraph 1407 of Order 693, Commissioners state " The Commission understands these (industry) concerns and is persuaded not to require generator operators or transmission operators at local control centers to be NERC certified at this time". Exelon agrees with FERC that it is the Balancing Authority, Reliability Coordinator and Transmission Operator, entities who have been certified by NERC per the guidelines in Appendix 5, Organization Registration and Certification of the NERC Rules Of Procedure, to whom the Standard should apply.

**Comment Form — SAR to Revise PER-003, Operating Personnel Credentials
 (Project 2007-04)**

Please use this form to submit comments on the proposed SAR to revise PER-003, Operating Personnel Credentials (Project 2007-04). Comments must be submitted by **January 31, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "Operating Personnel Credentials" in the subject line. If you have questions please contact Darrel Richardson at darrel.richardson@nerc.net or by telephone at (609) 613-1848.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Sam Ciccone	
Organization:	FirstEnergy Corp.	
Telephone:	(330) 252-6383	
E-mail:	sciccone@firstenergycorp.com	
NERC Region (check all Regions in which your company operates)		Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input checked="" type="checkbox"/> RFC	<input checked="" type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input checked="" type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Comment Form — Certifying System Operators SAR (Project 2007-04)

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region*	Segment*
Dave Folk	FE FERC Compliance		
Doug Hohlbaugh	FE FERC Compliance		
Larry Hartley	FE Solutions		

*If more than one Region or Segment applies, please list all that apply. Regional acronyms and segment numbers are shown on prior page.

Background Information

In response to stakeholder comments, the Certifying System Operators SAR Drafting Team modified the Certifying System Operators SAR to clarify that the proposed revisions to PER-003 **will not** include requirements for certification of generator operators or local control center operators.

Because these changes are significant, the Standards Committee directed the SAR DT to post the revised SAR for another comment period. Please review the revised SAR and then answer the following question, using this form. Please e-mail the form to sarcomm@nerc.net with the subject "Operating Personnel Credentials" by **Thursday, January 31, 2008**.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree with the modifications made to the SAR to eliminate any requirements for NERC certification of generator operators and local control center operators? If not, please explain in the comment area.

- Yes
- No

Comments: The modifications made to the SAR to eliminate the NERC certification requirements for Generator Operators and local control center operators is consistent with the FERC view of the matter as communicated in Order 693. We agree that certification should be focused on expectations, tailored towards specific job functions, and reflect the impact that an operators actions can have on the reliability of the Bulk Electric System.

Local control center operators that have at their unrestrained control the ability to perform switching on the Bulk Electric System, to shed load, or to restore load through the use of supervisory control or through the direct or indirect communication with a field switchman under some circumstances can have a profound impact on the reliability of the Bulk Electric System and should be certified. However, local control center operators in remote locations that are prohibited from developing and taking independent action during a normal, emergency or restoration conditions should not be required to be certified.

The Generator Operator (the operator at the controls of a plant or unit) should not be required to be certified. However, the Generator Operator (the operator on duty at a centrally located control center with control over a fleet of generators located at two or more power plants) can have a profound impact on the reliability of the Bulk Electric System and should be certified.

Both the Generator Operator and local control center operator requiring certification as outlined above should be subject to the certification requirements of a reliability organization such as NERC or a Regional Entity. These entities have the authority to develop and enforce standards compelling certification for all personnel with an impact on reliability.

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Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	Alessia Dawes
Organization:	Hydro One Networks
Telephone:	416-345-5286
E-mail:	alessia.dawes@hydroone.com
NERC Region (check all Regions in which your company operates)	Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/> 1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/> 2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input checked="" type="checkbox"/> 3 — Load-serving Entities
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/> 4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/> 5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/> 6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/> 7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/> 8 — Small Electricity End Users
<input type="checkbox"/> NA — Not Applicable	<input type="checkbox"/> 9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/> 10 — Regional Reliability Organizations and Regional Entities

Comment Form — Certifying System Operators SAR (Project 2007-04)

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region*	Segment*

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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

- 1. Do you agree with the modifications made to the SAR to eliminate any requirements for NERC certification of generator operators and local control center operators? If not, please explain in the comment area.**

- Yes
 No

Comments: Generator Operators or Local Control Centre Operators could operate a BES element. If so, they should require NERC certification.

Similar to how Generator Operators are referred to in the proposed EOP-005-2 on System Restoration and Blackstart Resources - Operations, include Generator Operators and Local Control Center Operators in the PER-003-0 standard Applicability section. In the Requirements section, write "Each Generator Operator who operates a Bulk Electricity System element ..."

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Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	Ron Falsetti
Organization:	IESO
Telephone:	905-855-6187
E-mail:	ron.falsetti@ieso.ca
NERC Region (check all Regions in which your company operates)	Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/> 2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/> 3 — Load-serving Entities
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<input type="checkbox"/> RFC	<input type="checkbox"/> 5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/> 6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/> 7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/> 8 — Small Electricity End Users
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	<input type="checkbox"/> 10 — Regional Reliability Organizations and Regional Entities

Comment Form — Certifying System Operators SAR (Project 2007-04)

Group Comments (Complete this page if comments are from a group.)			
Group Name:			
Lead Contact:			
Contact Organization:			
Contact Segment:			
Contact Telephone:			
Contact E-mail:			
Additional Member Name	Additional Member Organization	Region*	Segment*

*If more than one Region or Segment applies, please list all that apply. Regional acronyms and segment numbers are shown on prior page.

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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

- 1. Do you agree with the modifications made to the SAR to eliminate any requirements for NERC certification of generator operators and local control center operators? If not, please explain in the comment area.**

- Yes
 No

Comments: The IESO supports the SAR DT position not to mandate certification of local control centers (LCC) and Generator Operators.

The Generator Operator and the LCC Operator should not be subject to NERC certification requirements since they do not have the decision-making authority for the real-time operation of the Bulk-Power System.

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Kathleen Goodman	
Organization:	ISO New England	
Telephone:	(413) 535-4111	
E-mail:	kgoodman@iso-ne.com	
NERC Region (check all Regions in which your company operates)		Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Comment Form — Certifying System Operators SAR (Project 2007-04)

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region*	Segment*

*If more than one Region or Segment applies, please list all that apply. Regional acronyms and segment numbers are shown on prior page.

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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

- 1. Do you agree with the modifications made to the SAR to eliminate any requirements for NERC certification of generator operators and local control center operators? If not, please explain in the comment area.**

- Yes
 No

Comments: ISO New England supports the position not to mandate certification of LLCs and Generator Operators.

ISO New England believes that NERC standards only apply to Registered Entities identified in the Functional Model. Since "local control center" is not an entity defined in the NERC Functional Model and the definition of what exactly a local control center is varies across the country, creating a Standard that is applicable to this undefined entity would be problematic.

Given the divergence in both areas of operations and technology to be operated, ISO New England believes that the best approach is to not require Generator Operator certification, but leave this responsibility to the plant/station owners who have a strong business purpose for ensuring their operating personnel are proficient.

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region (check all Regions in which your company operates)		Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
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Comment Form — Certifying System Operators SAR (Project 2007-04)

Group Comments (Complete this page if comments are from a group.)

Group Name: ISO/RTO Council (IRC)

Lead Contact: Charles Yeung

Contact Organization: SPP

Contact Segment: 2

Contact Telephone: (832) 724-6142

Contact E-mail: cyeung@spp.org

Additional Member Name	Additional Member Organization	Region*	Segment*
Patrick Brown	PJM	RFC/SERC	2
Jim Castle	NYISO	NPCC	2
Ron Falsetti	IESO	NPCC	2
Matt Goldberg	ISO-NE	NPCC	2
Brent Kingsford	CAISO	WECC	2
Anita Lee	AESO	WECC	2
Steve Myers	ERCOT	ERCOT	2
Bill Phillips	NISO	RFC/SERC/MRO	2

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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

- 1. Do you agree with the modifications made to the SAR to eliminate any requirements for NERC certification of generator operators and local control center operators? If not, please explain in the comment area.**

- Yes
 No

Comments: The IRC supports the SAR DT position not to mandate certification of LLCs and Generator Operators.

The DT's position as regards to LLC's is consistent with the IRC's position that NERC standards only apply to Functional Entities identified in the Functional Model. Since "local control center" is not an entity defined in the NERC Functional Model and understanding of what exactly a local control center is varies across the country, registration of this undefined group would be inappropriate.

The concept of not mandating NERC-certification of Generator Operators (that would have concentrated on the few generalized NERC standards that apply to operating generators) is consistent with the position that a one-size fits all approach for generator operators may not be the best approach. The SAR DT position allows a decentralized but more focused program approach for the areas in which the operators must work.

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Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	Steve Rainwater
Organization:	Lower Colorado River Authority
Telephone:	512-482-6295
E-mail:	steve.rainwater@lcra.org
NERC Region (check all Regions in which your company operates)	Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input checked="" type="checkbox"/> ERCOT	<input checked="" type="checkbox"/> 1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/> 2 — RTOs and ISOs
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Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region *	Segment *

*If more than one Region or Segment applies, please list all that apply. Regional acronyms and segment numbers are shown on prior page.

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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

- 1. Do you agree with the modifications made to the SAR to eliminate any requirements for NERC certification of generator operators and local control center operators? If not, please explain in the comment area.**

- Yes
 No

Comments: Local control center operator needs to be defined. What exactly is a "local control center operator"? Will that mean that Transmission Operators in ERCOT will not need to be NERC certified since ERCOT itself performs the control area function? Also, in the LCRA system there are numerous transmission lines that are owned by COOP's but are operated by LCRA. Does this mean that distribution operators at the COOP's can operate their transmission lines without being certified, yet an LCRA transmission operator would be required to have a certification? As you can see much clarification is needed here. In addition, generator operators can have a major impact on the transmission system, yet their training may or may not address the transmission system itself. I spent 9 years in power plant operations, yet knew relatively little about the transmission system in relation to the detailed knowledge I possessed with respect to plant operations. Since coming to work in a transmission control center it has been my experience that transmission operators know much more concerning generation than generator operators know about transmission. This is most likely due to the fact that transmission operators, at LCRA anyhow, tend to have more prior work experience, and more importantly, the NERC Certification Program and Continuing Education Program stress that knowledge. The same could be done for generator operators in my opinion.

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Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	Tom Foreman
Organization:	Lower Colorado River Authority
Telephone:	512-473-3387
E-mail:	Generation_Compliance@lcra.org
NERC Region (check all Regions in which your company operates)	Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input checked="" type="checkbox"/> ERCOT	<input type="checkbox"/> 1 – Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/> 2 – RTOs and ISOs
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Group Name:

Lead Contact:

Contact Organization:

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Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region *	Segment *

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Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	Joseph DePoorter
Organization:	Madison Gas and Electric Company
Telephone:	608-252-1581
E-mail:	jdepoorter@mge.com
NERC Region (check all Regions in which your company operates)	Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 — Transmission Owners
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Contact Organization:

Contact Segment:

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Comments:

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Leo St. Hilaire	
Organization:	Manitoba Hydro (MHEB)	
Telephone:	204-487-5326	
E-mail:	lasthilaire@hydro.mb.ca	
NERC Region (check all Regions in which your company operates)	Registered Ballot Body Segment (check all industry segments in which your company is registered)	
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input checked="" type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	
<input type="checkbox"/> SERC	<input checked="" type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SPP	<input checked="" type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> WECC	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	8 — Small Electricity End Users
	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Comment Form — Certifying System Operators SAR (Project 2007-04)

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region *	Segment *

*If more than one Region or Segment applies, please list all that apply. Regional acronyms and segment numbers are shown on prior page.

Comment Form — Certifying System Operators SAR (Project 2007-04)

Background Information

In response to stakeholder comments, the Certifying System Operators SAR Drafting Team modified the Certifying System Operators SAR to clarify that the proposed revisions to PER-003 **will not** include requirements for certification of generator operators or local control center operators.

Because these changes are significant, the Standards Committee directed the SAR DT to post the revised SAR for another comment period. Please review the revised SAR and then answer the following question, using this form. Please e-mail the form to sarcomm@nerc.net with the subject "Operating Personnel Credentials" by **Thursday, January 31, 2008**.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

- 1. Do you agree with the modifications made to the SAR to eliminate any requirements for NERC certification of generator operators and local control center operators? If not, please explain in the comment area.**

Yes

No

Comments: The revisions to the SAR better represent the intent of the PER-003.

**Comment Form — SAR to Revise PER-003, Operating Personnel Credentials
 (Project 2007-04)**

Please use this form to submit comments on the proposed SAR to revise PER-003, Operating Personnel Credentials (Project 2007-04). Comments must be submitted by **January 31, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "Operating Personnel Credentials" in the subject line. If you have questions please contact Darrel Richardson at darrel.richardson@nerc.net or by telephone at (609) 613-1848.

Individual Commenter Information (Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region (check all Regions in which your company operates)		Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
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Comment Form — Certifying System Operators SAR (Project 2007-04)

Group Comments (Complete this page if comments are from a group.)

Group Name: Midwest ISO Stakeholders Standards Collaborators

Lead Contact: Marie Knox

Contact Organization: Midwest ISO

Contact Segment: 2

Contact Telephone: 317-249-5264

Contact E-mail: mknox@midwestiso.org

Additional Member Name	Additional Member Organization	Region *	Segment *
Jason Marshall	Midwest ISO	RFC, SERC, MRO, SPP	2
Barb Kedrowski	We Energies	RFC	5
Jim Cryulewski	JDRJC Associates	RFC	8
Carol Gerou	Minnesota Power	MRO	1,3,5
Alisha Anker	CWLP	SERC	1,3,5

*If more than one Region or Segment applies, please list all that apply. Regional acronyms and segment numbers are shown on prior page.

Background Information

In response to stakeholder comments, the Certifying System Operators SAR Drafting Team modified the Certifying System Operators SAR to clarify that the proposed revisions to PER-003 **will not** include requirements for certification of generator operators or local control center operators.

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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree with the modifications made to the SAR to eliminate any requirements for NERC certification of generator operators and local control center operators? If not, please explain in the comment area.

- Yes
- No

Comments: Training should be focused on expectations and tailored towards specific job functions. The plant operator and the local control center operator should not be subject to NERC certification requirements. It is not necessary for operators located in remote locations, who are not primarily responsible for the real-time operation of the Bulk-Power System, to be certified in real-time operations Reliability Standards because they are not involved in the functions in which this disciplined training would be advantageous. There is an exception though. Some entities have local control centers that actually do work, such as switching, that the main control center would normally do. To the extent this happens, the local control center operators should be certified. If it is done under the supervision of a NERC certified operator, no certification would be needed.

**Comment Form — SAR to Revise PER-003, Operating Personnel Credentials
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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region (check all Regions in which your company operates)		Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
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<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
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Comment Form — Certifying System Operators SAR (Project 2007-04)

Group Comments (Complete this page if comments are from a group.)

Group Name: MRO NSRS

Lead Contact: Michael Brytowski

Contact Organization: MRO

Contact Segment: 10

Contact Telephone: 651-855-1728

Contact E-mail: mj.brytowski@midwestreliability.org

Additional Member Name	Additional Member Organization	Region *	Segment *
Neal Balu	WPA	MRO	3,4,5,6,
Terry Bilke	MISO	MRO	2
Robert Coish	MHEB	MRO	1,3,5,6
Carol Gerou	MP	MRO	1,3,5,6
Jim Haigh	WAPA	MRO	1,6
Ken Goldsmith	ALTW (TDU)	MRO	4
Tom Mielnik	MEC	MRO	1,3,5,6
Pam Oreschnick	XCEL	MRO	1,3,5,6
Dave Rudolph	BEPC	MRO	1,3,5,6
Eric Ruskamp	LES	MRO	1,3,5,6
Joseph Knight	GRE	MRO	1,3,5,6
Larry Brusseau	MRO	MRO	10
Michael Brytowski	MRO	MRO	10
27 additional members	not mentioned above	MRO	10

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Background Information

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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

- 1. Do you agree with the modifications made to the SAR to eliminate any requirements for NERC certification of generator operators and local control center operators? If not, please explain in the comment area.**

- Yes
 No

Comments: Following the NERC functional model. As long as an entity is not performing a critical function. ie: Reliability Coordinator, Transmission Operator, and Balancing Authority. The term "Local Control Center" is not a defined NERC function and is unclear what is meant by "Local Control Center".

General Comment:

On page 3 of the SAR under the V0 Industry Comments section, the second comment reads "R1 - Suggestion to be incorporated into next version (version 1): ...". This comment further states "The operation position is to be filled by a person holding the appropriate level certification." The MRO believes the example given after this sentence to explain this sentence does not fully clarify who might hold an appropriate level certificate. The MRO believes the example should be expanded to included other appropriate level certificates such that the example should read "For example, a person that is acting as the Reliability Coordinasator will need to hold a Reliability Coordinator operator certificate and a person acting as a Transmission Operator would need to hold a Tranmission Operator certificate, a Balancing Interchange Transmission Operator certificate, and/or Reliability Coordinator certificate."

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 (Project 2007-04)**

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Individual Commenter Information (Complete this page for comments from one organization or individual.)		
Name:	Rick Koch	
Organization:	Nebraska Public Power District	
Telephone:	402-845-5210	
E-mail:	rlkoch@nppd.com	
NERC Region (check all Regions in which your company operates)	Registered Ballot Body Segment (check all industry segments in which your company is registered)	
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input checked="" type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 — Load-serving Entities
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<input type="checkbox"/> SPP	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> WECC	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	8 — Small Electricity End Users
	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Comment Form — Certifying System Operators SAR (Project 2007-04)

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region *	Segment *

*If more than one Region or Segment applies, please list all that apply. Regional acronyms and segment numbers are shown on prior page.

Background Information

In response to stakeholder comments, the Certifying System Operators SAR Drafting Team modified the Certifying System Operators SAR to clarify that the proposed revisions to PER-003 **will not** include requirements for certification of generator operators or local control center operators.

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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

- 1. Do you agree with the modifications made to the SAR to eliminate any requirements for NERC certification of generator operators and local control center operators? If not, please explain in the comment area.**

- Yes
 No

Comments: I believe that NERC certification of GOP and LCC operating personnel is appropriate if and only if a new certification is developed that is relevant to their job functions and their ability to impact the BES. In my opinion, the requirement for NERC certification of generator operators and local control center operators should be removed from Standard PER-003 until the new certification(s) have been developed and approved. Including the requirement at this time would result in the need to certify to one of the existing certifications. Reintroducing the requirement after approval of the new certification would allow owners, operators, and users of the bulk power system to know exactly what is being proposed before making it mandatory and enforceable.

An alternate approach would be to retain the requirement with a "phased-in" implementation schedule where the development of the appropriate certification(s) is the first phase. The risk of this approach is that an unknown certification becomes mandatory and enforceable. This is similar to writing a blank check.

**Comment Form — SAR to Revise PER-003, Operating Personnel Credentials
 (Project 2007-04)**

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Individual Commenter Information (Complete this page for comments from one organization or individual.)		
Name:	David Mahlmann	
Organization:	NYISO	
Telephone:	518-356-6110	
E-mail:	dmahlmann@nyiso.com	
NERC Region (check all Regions in which your company operates)		Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
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<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Comment Form — Certifying System Operators SAR (Project 2007-04)

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region *	Segment *

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Background Information

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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

- 1. Do you agree with the modifications made to the SAR to eliminate any requirements for NERC certification of generator operators and local control center operators? If not, please explain in the comment area.**

Yes

No

Comments:

**Comment Form — SAR to Revise PER-003, Operating Personnel Credentials
 (Project 2007-04)**

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Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	Ted Pappas
Organization:	New York State Reliability Council, Reliability Rules Subcommittee
Telephone:	516-545-4011
E-mail:	tpappas@service.lipower.org
NERC Region (check all Regions in which your company operates)	Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 – Transmission Owners
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Comment Form — Certifying System Operators SAR (Project 2007-04)

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Yes

No

Comments:

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Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	Rick White
Organization:	Northeast Utilities
Telephone:	860-665-2572
E-mail:	whitefb@nu.com
NERC Region (check all Regions in which your company operates)	Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/> 1 — Transmission Owners
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Comment Form — Certifying System Operators SAR (Project 2007-04)

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Group Name:

Lead Contact:

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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree with the modifications made to the SAR to eliminate any requirements for NERC certification of generator operators and local control center operators? If not, please explain in the comment area.

- Yes
- No

Comments: We do agree Generator Operators need not be NERC certified. However, the SAR should recognize NERC certification of Transmission Operators in a Local Control Center (LCC) may be appropriate. Several New England LCCs are registered TOPs who run studies, monitor the system, switch components in & out of service including reactive resources, address real-time contingencies including load shedding, perform system restoration, have backup centers, direct other control centers to take action, etc. All actions/activities are closely coordinated with the RC/BA who is also registered as a TOP. Responsibilities and chain-of-command are documented and clear. It is recognized other Areas may not allow LCCs to take action alone, they act only when directed. The SAR needs to accomodate the different models that exist. Any operator that can take unilateral action on the bulk power system should be NERC certified. The revised "clean" SAR does not appear to specifically prevent LCCs from having certified operators, but this modification implies that could be the case.

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Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	Douglas A. Jensen
Organization:	Vandolah Power Company L.L.C.
Telephone:	863-773-2277 x2222
E-mail:	doug.jensen@nsgsen.com
NERC Region (check all Regions in which your company operates)	Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 – Transmission Owners
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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree with the modifications made to the SAR to eliminate any requirements for NERC certification of generator operators and local control center operators? If not, please explain in the comment area.

- Yes
- No

Comments: The Certifying System Operators Drafting Team properly deleted the originally-proposed requirement for certification of generator operators and local control center operators. There is no justification for any such requirement. First, there has been no NERC proceeding establishing whether there is any need for such uniform certification. Second, the original PER-003 certification proposal was the subject of a great deal of disagreement within the industry, and presented a litany of implementation difficulties, which FERC recognized in Order No. 693 (at para. 1395); in fact, the FERC acknowledged that certain elements of the proposed personnel certification plan presented implementation difficulties, and did not originally propose to require generator operator personnel to be NERC-certified (at para. 1407). Third, the PER-003 proposed certifications were never agreed to by a consensus of the Bulk Power System Users. Fourth, the usefulness of any such certification requirement is questionable, particularly since the physical equipment, communications systems, and controls in place at different generators widely differs. The captioned filers strongly support the modifications made to the SAR to eliminate any requirements for NERC certification of generator operators and local control center operators.

**Comment Form — SAR to Revise PER-003, Operating Personnel Credentials
 (Project 2007-04)**

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	George Brady	
Organization:	Ohio Valley Electric Corporation	
Telephone:	740-289-7297	
E-mail:	gbrady@ovec.com	
NERC Region (check all Regions in which your company operates)		Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
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<input checked="" type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Comment Form — Certifying System Operators SAR (Project 2007-04)

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region *	Segment *

*If more than one Region or Segment applies, please list all that apply. Regional acronyms and segment numbers are shown on prior page.

Background Information

In response to stakeholder comments, the Certifying System Operators SAR Drafting Team modified the Certifying System Operators SAR to clarify that the proposed revisions to PER-003 **will not** include requirements for certification of generator operators or local control center operators.

Because these changes are significant, the Standards Committee directed the SAR DT to post the revised SAR for another comment period. Please review the revised SAR and then answer the following question, using this form. Please e-mail the form to sarcomm@nerc.net with the subject "Operating Personnel Credentials" by **Thursday, January 31, 2008**.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

- 1. Do you agree with the modifications made to the SAR to eliminate any requirements for NERC certification of generator operators and local control center operators? If not, please explain in the comment area.**

Yes

No

Comments:

**Comment Form — SAR to Revise PER-003, Operating Personnel Credentials
 (Project 2007-04)**

Please use this form to submit comments on the proposed SAR to revise PER-003, Operating Personnel Credentials (Project 2007-04). Comments must be submitted by **January 31, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "Operating Personnel Credentials" in the subject line. If you have questions please contact Darrel Richardson at darrel.richardson@nerc.net or by telephone at (609) 613-1848.

Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	Stan Southers / Ellis Rankin
Organization:	Oncor Electric Delivery Company LLC
Telephone:	214-486-2084 / 214-743-6825
E-mail:	stan.southers@oncor.com / erankin@oncor.com
NERC Region (check all Regions in which your company operates)	Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input checked="" type="checkbox"/> ERCOT	<input checked="" type="checkbox"/> 1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/> 2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/> 3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/> 4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/> 5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/> 6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/> 7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/> 8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/> 9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/> 10 — Regional Reliability Organizations and Regional Entities

Comment Form — Certifying System Operators SAR (Project 2007-04)

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region*	Segment*

*If more than one Region or Segment applies, please list all that apply. Regional acronyms and segment numbers are shown on prior page.

Background Information

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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

- 1. Do you agree with the modifications made to the SAR to eliminate any requirements for NERC certification of generator operators and local control center operators? If not, please explain in the comment area.**

- Yes
 No

Comments: Oncor endorses the modifications made to the previous version of this draft standard.

**Comment Form — SAR to Revise PER-003, Operating Personnel Credentials
 (Project 2007-04)**

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Individual Commenter Information (Complete this page for comments from one organization or individual.)		
Name: James T Murray		
Organization: ORLANDO COGEN LIMITED (NORTHERNSTAR GENERATION SERVICE)		
Telephone: 407-851-1350		
E-mail: jim.murray@nsgen.com		
NERC Region (check all Regions in which your company operates)		Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 – Transmission Owners
<input checked="" type="checkbox"/> FRCC	<input type="checkbox"/>	2 – RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 – Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 – Transmission-dependent Utilities
<input checked="" type="checkbox"/> RFC	<input checked="" type="checkbox"/>	5 – Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 – Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 – Large Electricity End Users
<input checked="" type="checkbox"/> WECC	<input type="checkbox"/>	8 – Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 – Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 – Regional Reliability Organizations and Regional Entities

Comment Form — Certifying System Operators SAR (Project 2007-04)

Group Comments (Complete this page if comments are from a group.)

Group Name: N/A

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region *	Segment *

*If more than one Region or Segment applies, please list all that apply. Regional acronyms and segment numbers are shown on prior page.

Background Information

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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

- 1. Do you agree with the modifications made to the SAR to eliminate any requirements for NERC certification of generator operators and local control center operators? If not, please explain in the comment area.**

- Yes
 No

Comments: The Certifying System Operators Drafting Team properly deleted the originally-proposed requirement for certification of generator operators and local control center operators. There is no justification for any such requirement. First, there has been no NERC proceeding establishing whether there is any need for such uniform certification. Second, the original PER-003 certification proposal was the subject of a great deal of disagreement within the industry, and presented a litany of implementation difficulties, which FERC recognized in Order No. 693 (at para. 1395); in fact, the FERC acknowledged that certain elements of the proposed personnel certification plan presented implementation difficulties, and did not originally propose to require generator operator personnel to be NERC-certified (at para. 1407). Third, the PER-003 proposed certifications were never agreed to by a consensus of the Bulk Power System Users. Fourth, the usefulness of any such certification requirement is questionable, particularly since the physical equipment, communications systems, and controls in place at different generators widely differs. The captioned filers strongly support the modifications made to the SAR to eliminate any requirements for NERC certification of generator operators and local control center operators.

**Comment Form — SAR to Revise PER-003, Operating Personnel Credentials
 (Project 2007-04)**

Please use this form to submit comments on the proposed SAR to revise PER-003, Operating Personnel Credentials (Project 2007-04). Comments must be submitted by **January 31, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "Operating Personnel Credentials" in the subject line. If you have questions please contact Darrel Richardson at darrel.richardson@nerc.net or by telephone at (609) 613-1848.

Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	Larry Larson
Organization:	Otter Tail Power Company
Telephone:	218-739-2809
E-mail:	llarson@otpc.com
NERC Region (check all Regions in which your company operates)	Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/> 1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/> 2 — RTOs and ISOs
<input checked="" type="checkbox"/> MRO	<input checked="" type="checkbox"/> 3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/> 4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input checked="" type="checkbox"/> 5 — Electric Generators
<input type="checkbox"/> SERC	<input checked="" type="checkbox"/> 6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/> 7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/> 8 — Small Electricity End Users
<input type="checkbox"/> NA — Not Applicable	<input type="checkbox"/> 9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/> 10 — Regional Reliability Organizations and Regional Entities

Background Information

In response to stakeholder comments, the Certifying System Operators SAR Drafting Team modified the Certifying System Operators SAR to clarify that the proposed revisions to PER-003 **will not** include requirements for certification of generator operators or local control center operators.

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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree with the modifications made to the SAR to eliminate any requirements for NERC certification of generator operators and local control center operators? If not, please explain in the comment area.

- Yes
- No

Comments: GOPs should have proper GOP certification that focuses on their duties with an understanding of the impact on BES reliability. Similarly, LCCs should have LCC certification that focuses on their specific duties and their impact on BES reliability. We believe NERC certification is an important part of reliable operations but expect that the industry would be better served with specific certification which properly address duties of GOPs and LCCs since the functional model clearly draws a line between the duties of those two entities and those of a BA. The NERC Certification is a "baseline" of knowledge demonstrated through a written exam. We encourage others to not only endorse this certification need, but also to use this as a "baseline" for their training programs. With the turn-over of System Operations Personnel soon to come to our industry it is essential we maintain a basic level of knowledge among all personnel that effect the operation of the BES.

**Comment Form — SAR to Revise PER-003, Operating Personnel Credentials
 (Project 2007-04)**

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Individual Commenter Information (Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region (check all Regions in which your company operates)		Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Comment Form — Certifying System Operators SAR (Project 2007-04)

Group Comments (Complete this page if comments are from a group.)

Group Name: Pepco Holdings, Inc. Affiliates

Lead Contact: Richard Kafka

Contact Organization: Pepco Holdings, Inc

Contact Segment: 1

Contact Telephone: 301-469-5274

Contact E-mail: rjkafka@pepcoholdings.com

Additional Member Name	Additional Member Organization	Region *	Segment *
Valerie Hildebrand	Potomac Electric Power Company	RFC	1
John Keller	Atlantic City Electric	RFC	1
Vic Davis	Delmarva Power	RFC	1

*If more than one Region or Segment applies, please list all that apply. Regional acronyms and segment numbers are shown on prior page.

Background Information

In response to stakeholder comments, the Certifying System Operators SAR Drafting Team modified the Certifying System Operators SAR to clarify that the proposed revisions to PER-003 **will not** include requirements for certification of generator operators or local control center operators.

Because these changes are significant, the Standards Committee directed the SAR DT to post the revised SAR for another comment period. Please review the revised SAR and then answer the following question, using this form. Please e-mail the form to sarcomm@nerc.net with the subject "Operating Personnel Credentials" by **Thursday, January 31, 2008**.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

- 1. Do you agree with the modifications made to the SAR to eliminate any requirements for NERC certification of generator operators and local control center operators? If not, please explain in the comment area.**

Yes

No

Comments:

**Comment Form — SAR to Revise PER-003, Operating Personnel Credentials
 (Project 2007-04)**

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Lauri Jones	
Organization:	Pacific Gas and Electric Company	
Telephone:	415-973-0918	
E-mail:	llj8@pge.com	
NERC Region (check all Regions in which your company operates)		Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input checked="" type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input checked="" type="checkbox"/>	7 — Large Electricity End Users
<input checked="" type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Background Information

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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

- 1. Do you agree with the modifications made to the SAR to eliminate any requirements for NERC certification of generator operators and local control center operators? If not, please explain in the comment area.**

Yes

No

Comments:



NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION

**Comment Form — SAR to Revise PER-003, Operating Personnel Credentials
(Project 2007-04)**

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Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	Patrick Brown
Organization:	PJM Interconnection
Telephone:	610-666-4597
E-mail:	brownp@pjm.com
NERC Region (check all Regions in which your company operates)	Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/> 2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/> 3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/> 4 — Transmission-dependent Utilities
<input checked="" type="checkbox"/> RFC	<input type="checkbox"/> 5 — Electric Generators
<input checked="" type="checkbox"/> SERC	<input type="checkbox"/> 6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/> 7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/> 8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/> 9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/> 10 — Regional Reliability Organizations and Regional Entities

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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

- 1. Do you agree with the modifications made to the SAR to eliminate any requirements for NERC certification of generator operators and local control center operators? If not, please explain in the comment area.**

- Yes
 No

Comments: PJM agrees with this modification. We, as do many other entities, have an internal certification process for GOs and LCCs that are specific to the PJM system.

**Comment Form — SAR to Revise PER-003, Operating Personnel Credentials
 (Project 2007-04)**

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Individual Commenter Information (Complete this page for comments from one organization or individual.)		
Name:	Annette M. Bannon	
Organization:	PPL Generation, LLC	
Telephone:	610-774-2064	
E-mail:	ambannon@pplweb.com	
NERC Region (check all Regions in which your company operates)		Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input checked="" type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input checked="" type="checkbox"/> RFC	<input checked="" type="checkbox"/>	5 — Electric Generators
<input checked="" type="checkbox"/> SERC	<input checked="" type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input checked="" type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input checked="" type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Comment Form — Certifying System Operators SAR (Project 2007-04)

Group Comments (Complete this page if comments are from a group.)

Group Name: PPL Supply
Lead Contact: Annette Bannon
Contact Organization: PPL Generation
Contact Segment: 5, 6
Contact Telephone: 610-774-2064
Contact E-mail: ambannon@pplweb.com

Additional Member Name	Additional Member Organization	Region*	Segment*
Mark Bryant	PPL Eastern Fossil & Hydro	RFC	5
		NPCC	5
Joe Kisela	PPL Eastern Fossil & Hydro	RFC	5
		NPCC	5
David Gladey	PPL Susquehanna	RFC	5
Tom Olson	PPL Montana	WECC	5
Mark Heimbach	PPL EnergyPlus	RFC	6
		NPCC	6
		MRO	6
		SERC	6
		SPP	6
Jon Williamson	PPL EnergyPlus	WECC	6
John Cummings	PPL EnergyPlus	WECC	6

*If more than one Region or Segment applies, please list all that apply. Regional acronyms and segment numbers are shown on prior page.

Background Information

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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

- 1. Do you agree with the modifications made to the SAR to eliminate any requirements for NERC certification of generator operators and local control center operators? If not, please explain in the comment area.**

- Yes
 No

Comments: PPL Supply Groups agree with the changes made by the SAR drafting team to eliminate the requirements for generator operator and local control center operators to be NERC certified.

**Comment Form — SAR to Revise PER-003, Operating Personnel Credentials
 (Project 2007-04)**

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Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	Kenneth D. Brown
Organization:	PSEG Companies
Telephone:	973-430-6470
E-mail:	Kenneth.Brown@PSEG.com
NERC Region (check all Regions in which your company operates)	Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input checked="" type="checkbox"/> ERCOT	<input checked="" type="checkbox"/> 1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/> 2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input checked="" type="checkbox"/> 3 — Load-serving Entities
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/> 4 — Transmission-dependent Utilities
<input checked="" type="checkbox"/> RFC	<input checked="" type="checkbox"/> 5 — Electric Generators
<input type="checkbox"/> SERC	<input checked="" type="checkbox"/> 6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/> 7 — Large Electricity End Users
<input checked="" type="checkbox"/> WECC	<input type="checkbox"/> 8 — Small Electricity End Users
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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

- 1. Do you agree with the modifications made to the SAR to eliminate any requirements for NERC certification of generator operators and local control center operators? If not, please explain in the comment area.**

Yes

No

Comments:

**Comment Form — SAR to Revise PER-003, Operating Personnel Credentials
 (Project 2007-04)**

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Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	Thomas J Bradish
Organization:	Reliant Energy
Telephone:	724-597-8593
E-mail:	tbradish@reliant.com
NERC Region (check all Regions in which your company operates)	Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input checked="" type="checkbox"/> ERCOT	<input type="checkbox"/> 1 — Transmission Owners
<input checked="" type="checkbox"/> FRCC	<input type="checkbox"/> 2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/> 3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/> 4 — Transmission-dependent Utilities
<input checked="" type="checkbox"/> RFC	<input checked="" type="checkbox"/> 5 — Electric Generators
<input checked="" type="checkbox"/> SERC	<input type="checkbox"/> 6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/> 7 — Large Electricity End Users
<input checked="" type="checkbox"/> WECC	<input type="checkbox"/> 8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/> 9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/> 10 — Regional Reliability Organizations and Regional Entities

Comment Form — Certifying System Operators SAR (Project 2007-04)

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region *	Segment *

*If more than one Region or Segment applies, please list all that apply. Regional acronyms and segment numbers are shown on prior page.

Background Information

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Because these changes are significant, the Standards Committee directed the SAR DT to post the revised SAR for another comment period. Please review the revised SAR and then answer the following question, using this form. Please e-mail the form to sarcomm@nerc.net with the subject "Operating Personnel Credentials" by **Thursday, January 31, 2008**.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

- 1. Do you agree with the modifications made to the SAR to eliminate any requirements for NERC certification of generator operators and local control center operators? If not, please explain in the comment area.**

Yes

No

Comments:

**Comment Form — SAR to Revise PER-003, Operating Personnel Credentials
 (Project 2007-04)**

Please use this form to submit comments on the proposed SAR to revise PER-003, Operating Personnel Credentials (Project 2007-04). Comments must be submitted by **January 31, 2008**. You may submit the completed form by e-mail to sarcomm@nerc.net with the words "Operating Personnel Credentials" in the subject line. If you have questions please contact Darrel Richardson at darrel.richardson@nerc.net or by telephone at (609) 613-1848.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Mike Pfeister	
Organization:	Salt River Project	
Telephone:	602-236-3970	
E-mail:	Mike.Pfeister@srpnet.com	
NERC Region (check all Regions in which your company operates)		Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	
<input type="checkbox"/> SERC	<input checked="" type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SPP	<input checked="" type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input checked="" type="checkbox"/> WECC	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	8 — Small Electricity End Users
	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

- 1. Do you agree with the modifications made to the SAR to eliminate any requirements for NERC certification of generator operators and local control center operators? If not, please explain in the comment area.**

Yes

No

Comments:

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Individual Commenter Information (Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region (check all Regions in which your company operates)		Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
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<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Comment Form — Certifying System Operators SAR (Project 2007-04)

Group Comments (Complete this page if comments are from a group.)

Group Name: Santee Cooper
Lead Contact: Terry Blackwell
Contact Organization: Santee Cooper
Contact Segment: Transmission
Contact Telephone: 843-761-8000 ext. 5196
Contact E-mail: tblackw@santeecooper.com

Additional Member Name	Additional Member Organization	Region *	Segment *
Tom Abrams	Santee Cooper	SERC	1
Glenn Stephens	Santee Cooper	SERC	1
Rene' Free	Santee Cooper	SERC	1
Kristi Boland	Santee Cooper	SERC	1

*If more than one Region or Segment applies, please list all that apply. Regional acronyms and segment numbers are shown on prior page.

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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

- 1. Do you agree with the modifications made to the SAR to eliminate any requirements for NERC certification of generator operators and local control center operators? If not, please explain in the comment area.**

Yes

No

Comments:

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Individual Commenter Information (Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region (check all Regions in which your company operates)		Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
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<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
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Comment Form — Certifying System Operators SAR (Project 2007-04)

Group Comments (Complete this page if comments are from a group.)

Group Name: SERC OC Standards Review Group (Project 2007-04)

Lead Contact: Jim Griffith, Chair - SERC Operating Committee

Contact Organization: Southern Company Services, Inc.

Contact Segment: Transmission Owner

Contact Telephone: 205-257-6892

Contact E-mail: jsgriffi@southernco.com

Additional Member Name	Additional Member Organization	Region *	Segment *
Dan Jewell	LA Generating, LLC	SERC	3,4
Charlie Deleon	LA Generating, LLC	SERC	3,4
James Ford	Southern Co.	SERC	1,3
Alisha Anker	City of Springfield, IL - CWLP	SERC	1,3,5
Paul Hodges	GA System Operations Corporation	SERC	1,3
Wayne Pourciau	GA System Operations Corporation	SERC	1,3
Brian Haggard	GA System Operations Corporation	SERC	1,3
Gary Jenkins	GA System Operations Corporation	SERC	1,3
Wayne Mitchell	Entergy	SERC	1,3
Steve McElhaney	So. Miss. Elec. Power Assoc.	SERC	1,3
Charles Evans	So. Miss. Elec. Power Assoc.	SERC	1,3
Dan Kay	So. Miss. Elec. Power Assoc.	SERC	1,3
Alan Wilson	So. Miss. Elec. Power Assoc.	SERC	1,3
Gary Hutson	So. Miss. Elec. Power Assoc.	SERC	1,3
John Neagle	Assoc. Electric Cooperative, Inc.	SERC	1,3
James Vermillion	Assoc Electric Cooperative, Inc.	SERC	1,3
Robert Thomasson	Big Rivers Electric Corporation	SERC	1,3
Jeff Brown	Big Rivers Electric Corporation	SERC	1,3
John Rembold	Southern Illinois Power Cooperative	SERC	1,3
Jim Case	Entergy	SERC	1,3
Richard Chapman	Owensboro, KY Municipal Utilities	SERC	1,3
Margaret Stambach	SERC Reliability Corporation	SERC	10

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Comment Form — Certifying System Operators SAR (Project 2007-04)

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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

- 1. Do you agree with the modifications made to the SAR to eliminate any requirements for NERC certification of generator operators and local control center operators? If not, please explain in the comment area.**

Yes

No

Comments: We support this modification as it pertains to the functions that are applicable under PER-003.

Listed below are additional supporters of the comments that could not fit in the comment list.

Member Names	Member Organization	Region	Segment
Pat Huntley	SERC Reliability Corporation	SERC	10
Rene' Free	Santee Cooper	SERC	1
Kristi Boland	Santee Cooper	SERC	1
Mike Fielden	Tennessee Valley Authority	SERC	1,3,9
Sue Mangum Goins	Tennessee Valley Authority	SERC	1,3,9
Gene Delk	So. Carolina Electric & Gas	SERC	1,3
Steve Hebert	So. Carolina Electric & Gas	SERC	1,3
John Troha	SERC Reliability Corporation	SERC	10
Tim Hattaway	Alabama Electric Cooperative, Inc.	SERC	1,3
Richard McCall	No. Carolina Elec Membership Corp.	SERC	3,4,5
R. L. Williamson	Georgia Power Co.	SERC	1,3

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Operating Reliability Working Group (ORWG)	
Organization:	Southwest Power Pool	
Telephone:	501-614-3241	
E-mail:	rrhodes@spp.org	
NERC Region (check all Regions in which your company operates)	Registered Ballot Body Segment (check all industry segments in which your company is registered)	
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input checked="" type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input checked="" type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
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	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Comment Form — Certifying System Operators SAR (Project 2007-04)

Group Comments (Complete this page if comments are from a group.)

Group Name: Operating Reliability Working Group (ORWG)

Lead Contact: Robert Rhodes

Contact Organization: Southwest Power Pool

Contact Segment: 2

Contact Telephone: 501-614-3241

Contact E-mail: rrhodes@spp.org

Additional Member Name	Additional Member Organization	Region *	Segment *
Mike Anderson	AEP	SPP	1,3,5
Jason Atwood	Kelson Energy	SPP	5,6
Mike Gammon	KCPL	SPP	1,3,5
Pete Kuebeck	OG&E	SPP	1,3,5
Paul Lampe	City of Independence	SPP	1,3,5
Scott Lockwood	AEP	SPP	1,3,5
Jim Medford	Westar	SPP	1,3,5
Danny McDaniel	CLECO	SPP	1,3,5
Kyle McMenamin	SPS	SPP	1,3,5
Robert Rhodes	SPP	SPP	2
Jason Smith	SPP	SPP	2
Jim Useldinger	KCPL	SPP	1,3,5

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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree with the modifications made to the SAR to eliminate any requirements for NERC certification of generator operators and local control center operators? If not, please explain in the comment area.

- Yes
- No

Comments: Although we concur with elimination of the requirement to certify generator operators (the operator actually controlling the generator), we have concerns that there are certain situations where we need to be sure that accountability is assigned to the Generator Operator entity. This may require including Generator Operator in the applicability section of standards where they may not be currently listed.

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Stephen Joseph	
Organization:	Tampa Electric Company	
Telephone:	813-630-6510	
E-mail:	sjjoseph@tecoenergy.com	
NERC Region (check all Regions in which your company operates)		Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input checked="" type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 — Load-serving Entities
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Comment Form — Certifying System Operators SAR (Project 2007-04)

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region*	Segment*

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1. Do you agree with the modifications made to the SAR to eliminate any requirements for NERC certification of generator operators and local control center operators? If not, please explain in the comment area.

- Yes
- No

Comments: I feel NERC certification should be required for Generator Operators and Transmission Operators in a local control center. It is hard for me to believe that the entities listed above would not take corrective action for a realtime contingency or would let their system suffer a voltage collapse while waiting on direction from a NERC Certified ISO/RTO. If the entities listed above do take direct action to return thier system to a stable state, which I would expect them to do, without direction from the NERC Certified ISO/RTO, than they would be in violation of NERC Standards.