

Consideration of Comments on Initial Ballot — Certifying System Operators (Project 2007-04)
Date of Initial Ballot: December 2-13, 2010

Summary Consideration:

If you feel that the drafting team overlooked your comments, please let us know immediately. Our goal is to give every comment serious consideration in this process. If you feel there has been an error or omission, you can contact the Vice President and Director of Standards, Herb Schrayshuen, at 609-452-8060 or at herb.schrayshuen@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

Voter	Entity	Segment	Vote	Comment
Rodney Phillips	Allegheny Power	1	Negative	This standard has not successfully answered the question of who is required to be certified.
Paul B. Johnson	American Electric Power	1	Affirmative	AEP recommends that footnote number 1 should be removed from this standard. If it is to remain, AEP recommends that the language should be as follows: The NERC Certified System Operator has ultimate responsibility for the performance of the reliability-related tasks. If our recommendations are not accepted, then the term "operating position" needs to be formally defined or removed. Footnote change is acceptable.
Jason Shaver	American Transmission Company, LLC	1	Negative	ATC supports the change to M1.3, however, the change to Footnote 1 has added more confusion rather than added clarity. To be clear, Footnote 1 should be revised to read, "Non-NERC certified System Operators in-training performing any reliability related tasks of a real-time operating position must be under the direct supervision of a NERC Certified System Operator stationed at that operating position in the Control Center; the NERC Certified System Operator at that operating position has ultimate responsibility for the performance of the reliability-related task."
John Bussman	Associated Electric Cooperative, Inc.	1	Affirmative	Comments have been addressed
John J. Moraski	Baltimore Gas & Electric Company	1	Affirmative	(See comment form for BGE comments)
Tony Kroskey	Brazos Electric Power Cooperative, Inc.	1	Negative	Additional clarification is needed.

¹ The appeals process is in the Reliability Standards Development Procedure: http://www.nerc.com/files/RSDP_V6_1_12Mar07.pdf.

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Paul Rocha	CenterPoint Energy	1	Affirmative	CenterPoint Energy was pleased with the revisions that clarified the direct supervision of non-NERC certified personnel as well as the changes to M1.3. Therefore, CenterPoint Energy is changing its vote from "negative" to "affirmative".
Danny McDaniel	Cleco Power LLC	1	Affirmative	None
Gordon Pietsch	Great River Energy	1	Negative	The definition of "System Operator" in the NERC Glossary includes "Generator Operator", however generator operators are not covered in any specific requirement in the standard. We believe the term "Generator Operator" should be removed from the definition of "System Operator", or specifically noted as not applicable for this standard, to remove any ambiguity in the implementation of this standard. GRE believes that it is important to note that the Generator Operator is the Registered Entity that performs the functions as listed in the NERC Statement of Compliance Registry Criteria (Revision 5.0) and not the person operating the generator. If the drafting team believes that System Operators require a valid NERC Certificate to fill Real-time operating positions responsible for control of the BES and that they be certified through the NERC System Operator Certification Program and that these System Operators meet certain competencies then it should be a requirement of the ERO to develop a System Operator Certification program that includes these competencies where by obtaining the requisite certification the System Operator would have demonstrated these competencies. While some argue that standards cannot apply to the ERO, we would point out that the results-based standards approach approved by the NERC BOT does appear to allow the ERO to be set as an applicable entity. An example of this is the recently posted Project 2009-01 Impact Event and Disturbance Assessment, Analysis, and Reporting which includes a number of requirements applicable to the ERO and is following the results-based approach.
Michael Moltane	International Transmission Company Holdings Corp	1	Negative	The list of skills added, generally speaking, give little value to this revision as they do nothing but define general areas that are included in the NERC exam. The compliance comes from being certified, and showing only certified folks are working; therefore our compliance proof will not change.
Terry Harbour	MidAmerican Energy Co.	1	Negative	MidAmerican believes that if wording about "positions performing Transmission Operator reliability-related tasks" cannot be included or the PER-003 standard effective date must be extended out beyond the current PER-005 date to avoid advancing incorrectly advancing NERC compliance on reliability related tasks already identified in a FERC Order.
Brad Chase	Orlando Utilities Commission	1	Abstain	It is unclear as to what evidence is required to prove "demonstrated minimum competency" since this level of competency is not defined and is clearly up to interpretation. Additionally it would appear that by the wording of the main

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				requirements, obtaining and maintaining a valid NERC certification itself demonstrates the minimum competencies (through use of the word "by") alleviating the need for the competencies sub-requirements. If evidence of system operators demonstrating minimum competencies is expected to presented during a compliance audit, entities need to have a reasonable expectation of what will be expected. This is currently not the case.
Lawrence R. Larson	Otter Tail Power Company	1	Negative	The proposed purpose statement does not align with the requirements as proposed, and the proposed measurements only focus on the Registered Entity (RE) ensuring each real-time operating position is staffed with properly NERC certified staff according to the function performed, with no reference of any measurements to the competency lists identified in each requirement. A NERC System operator certification credential does not alone guarantee operational competency. Competency encompasses a combination of knowledge, skills, and behaviors to perform a specific role. Furthermore the NERC System Operator Certification Program is a knowledge based assessment, as it does not clearly define the assessment of skills and behaviors related to the high-level competencies listed in the certification exam content outlines. This is further demonstrated by the Standard Drafting Team stating in consideration of comments received on the draft, under question 10A, that "Certification ensures that System Operators with responsibility for real-time operations have a minimum level of knowledge that assists in their achieving reliable operations." The current verbiage leaves too much open for interpretation, and should be further defined to alleviate any inconsistency in the application and interpretation of this standard. This standard should focus on requiring System Operators (associated with RC, TOP and BA) to be NERC certified and should not address the competency list per function as a requirement of the RC, TOP, and BA Function. This standard should instead address this issue through the NERC system operator certification program as administered through the NERC Personnel Certification Governance Committee (PCGC). The PCGC has a well defined process that ensures the applicability of competencies to each credential through the use of job analysis, a well established process as provided by National Organization for Competency Assurance (NOCA) and American National Standard Institute (ANSI) guidelines. The defined requirements as listed 1 through 3 (with the omission of the competency lists) could stand, thus ensuring that the RE of the function is required to staff the real-time operating positions with individuals currently certified with the proper NERC Certificates as defined in each requirement.
Frank F. Afranji	Portland General Electric Co.	1	Affirmative	I agree with the changes proposed.

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Catherine Koch	Puget Sound Energy, Inc.	1	Negative	PSE appreciates the SDTs need to include the areas of competency described in R1.1 and R2.1 as directed by FERC. However the structure of these competencies are included leave the applicable entities in a vulnerable predicament as what is included in the NERC System Operator Certification program is not in their control. It could be that the program at some point doesn't meet the R1.1 and R2.1 leaving the entities to determine then how best to meet these requirements. We suggest at minimum, that NERC becomes an entity for this this standard is applicable (to be noted in the applicability section) and a sentence describing NERC's role in assuring these competencies are addressed in their program be added. There are other standards such as the CIP standards in which NERC is listed in the applicability section. This would seem to ensure a gap doesn't inadvertently develop. Additionally, the proposed standard uses several capitalized terms without proposing definitions for them, including "NERC System Operator Certification Program", "Reliability Operator, "Balancing, Interchange and Transmission Operator" and "Balancing and Interchange Operator." These terms still need to be defined within the standard at minimum or the NERC Glossary. Also the footnote formulation is different on p. 2 and p. 3. The formulation on p. 3 should be used in both places if we have to use one or the other, but an even better formulation is set forth in M1.1 of the current standard. Finally, a small issue is that the subsections to the requirements are not labeled with a preceeding "R" for consistency with other standards.
Rich Salgo	Sierra Pacific Power Co.	1	Affirmative	The SDT satisfactorily addressed our prior concern that an audit approach could conceivably require some yet-to-be-defined demonstration of competency, beyond the evidence of valid certification.
Horace Stephen Williamson	Southern Company Services, Inc.	1	Negative	Ref R1-3 We believe the term "competency" should be changed to "capability" to more accurately reflect the purpose of the statement. The certification process assures that an operator is "capable" of performing reliability related tasks, not that the operator is "competent" in performing those tasks. In order to determine "competency", the operator would need to be observed over a long period of time to capture performance measures during various unexpected operating conditions. Therefore, the term "competency" should not be used in describing an operator who has simply been certified through the NERC System Operator Certification Program. Therefore we suggest changing the term "competency" to "capability" in each of the three requirements. We believe that listing the specific technical "Areas of Competency" under each requirement will be problematic and very hard to manage. By this method, in order to change a topic on the exam, you would also have to change the standard, creating a new SAR, comment period, ballot, and approval. The technical capabilities are already listed in the exam and should be left there where they are more easily updated. Further issues with this draft listing the "Areas

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				<p>of Competency” are that each listed area is numbered as a sub-requirement of the standard, yet no measure exists that is related to each of these sub-requirements. This in effect creates an issue of how to determine compliance. Therefore, we suggest striking the entire sub-section “Areas of Competency” from each of the three requirements. However, if the drafting team chooses to keep these sections, we request the heading be changed to “Areas of Capability” (in line with our previous comment), that bullets be used instead of numbers, and that the list be moved to the appendix instead of being listed as a sub section in each of the three requirements. Ref M1-4 Again, in line with our previous comment , we request that “competency” be changed to “capability”. M1.1 asks for a “list of Real-time operating positions”. Those titles are unique to each entity that creates them and will undoubtedly vary across industry. This inconsistency will only lead to confusion during audits as each title will have to be explained for that specific entity. The specific position title should not matter as long as the entity can provide evidence of each operator’s NERC certification and specific credentials. Therefore we suggest that M1.1 be removed from the list of measures. M1.2 requests a “list of System Operators assigned to its Real-time operating positions” while M1.4 requests “evidence showing which System Operators were assigned to work in Real-time operating positions.” We feel that M1.2 is inherently present in M1.4, since the evidence provided in M1.4 will identify the list of Operators requested in M1.2, and therefore the two measures should be combined. To further clarify the term “NERC Certified” should precede the term “System Operators” in the new combined measure. M1.3 asks for “a copy of each of its System Operator’s NERC Certificate” OR “NERC certificate number with expiration date.” We feel that attempting to maintain a copy of each operator’s certificate could be problematic since only the operator has access to the actual certificate. A simpler solution would be to just maintain a list of NERC certificate numbers and the issuance/expiration dates associated. In the event this information is not readily available from the operator, the employer then has recourse to get confirmation from NERC that an individual in fact holds a valid NERC certificate. (Ref: p.14 of the System Operator Certification Program Manual, updated Nov. 2009) While the current draft is phrased as one or the other, we feel that appearances could be created that an entity is not fully complying with the measure if the copy cannot be produced. Therefore we request that the first part of the statement referencing copies of the certificate be removed and just the list of certificate numbers be used for measure. The revised M1.3 would read “NERC certificate number with issuance & expiration date for each System Operator.” Additional For consistency and to better identify the application of the standard, we suggest changing the title to “Real-time Operating Personnel Credentials” Also for consistency with other standards, we suggest changing the</p>

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				measure numbering to directly reflect the corresponding requirement numbering.
John Tolo	Tucson Electric Power Co.	1	Affirmative	We support these changes
Gregory L Pieper	Xcel Energy, Inc.	1	Negative	Xcel Energy votes negative, primarily because the standard continues to list competencies required, though the entities have no control over what competencies are actually covered in the testing to obtain the certificates listed. The standard should be simple and uncluttered and list the certifications required for each functional entity. If there is a need to list competencies that are covered by the certification process, then the governing criteria for that certification process should be assigned that obligation.
Mark B Thompson	Alberta Electric System Operator	2	Negative	The requirements and measures should be reworded to eliminate the term "competency". The competency lists should not be included in the standard. Competency is ensured by The Systematic Approach to Training required by PER-005, which requires that training programs are developed based on specific tasks.
Jason L Marshall	Midwest ISO, Inc.	2	Affirmative	We don't agree with the response to our comments from the SDT during the initial ballot regarding our suggestion to change the phrase "performing Reliability Coordinator reliability-related tasks" to "meeting its functional obligations". The SDT indicated that the Function Model contains other tasks than reliability related tasks. The primary purpose of the Functional Model is to identify reliability related tasks to facilitate standards development. However, we don't believe this single issue probably warrants us to persist in our negative vote. We continue to believe that the competencies areas should apply to the ERO since it manages the certification program. Contrary to the SDT response to our comments, we don't believe that applying these requirements to the ERO threatens the autonomy of the certification program or weakens it in any way. In fact, identification of the areas of competency and application of the areas of competency to the ERO probably strengthens the program and improves the autonomy because it creates a common set of expectations. We do believe that application of the areas of competency to the responsible entities does create an unnecessary risk that NERC could change the certification program in a way that does not meet those areas of competency and thus, causes the responsible entity to be non-compliant. However, we are confident that NERC will work with the responsible entities to ensure this does not happen.
Charles H Yeung	Southwest Power Pool	2	Negative	We do not support the standard as written. Please refer to the comments submitted by the IRC Standards Review Committee for our concerns.

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Richard J. Mandes	Alabama Power Company	3	Negative	<p>Ref R1-3 We believe the term "competency" should be changed to "capability" to more accurately reflect the purpose of the statement. The certification process assures that an operator is "capable" of performing reliability related tasks, not that the operator is "competent" in performing those tasks. In order to determine "competency", the operator would need to be observed over a long period of time to capture performance measures during various unexpected operating conditions. Therefore, the term "competency" should not be used in describing an operator who has simply been certified through the NERC System Operator Certification Program. Therefore we suggest changing the term "competency" to "capability" in each of the three requirements. We believe that listing the specific technical "Areas of Competency" under each requirement will be problematic and very hard to manage. By this method, in order to change a topic on the exam, you would also have to change the standard, creating a new SAR, comment period, ballot, and approval. The technical capabilities are already listed in the exam and should be left there where they are more easily updated. Further issues with this draft listing the "Areas of Competency" are that each listed area is numbered as a sub-requirement of the standard, yet no measure exists that is related to each of these sub-requirements. This in effect creates an issue of how to determine compliance. Therefore, we suggest striking the entire sub-section "Areas of Competency" from each of the three requirements. However, if the drafting team chooses to keep these sections, we request the heading be changed to "Areas of Capability" (in line with our previous comment), that bullets be used instead of numbers, and that the list be moved to the appendix instead of being listed as a sub section in each of the three requirements. Ref M1-4 Again, in line with our previous comment , we request that "competency" be changed to "capability". M1.1 asks for a "list of Real-time operating positions". Those titles are unique to each entity that creates them and will undoubtedly vary across industry. This inconsistency will only lead to confusion during audits as each title will have to be explained for that specific entity. The specific position title should not matter as long as the entity can provide evidence of each operator's NERC certification and specific credentials. Therefore we suggest that M1.1 be removed from the list of measures. M1.2 requests a "list of System Operators assigned to its Real-time operating positions" while M1.4 requests "evidence showing which System Operators were assigned to work in Real-time operating positions." We feel that M1.2 is inherently present in M1.4, since the evidence provided in M1.4 will identify the list of Operators requested in M1.2, and therefore the two measures should be combined. To further clarify the term "NERC Certified" should precede the term "System Operators" in the new combined measure. M1.3 asks for "a copy of each of its System Operator's NERC Certificate" OR "NERC certificate number with expiration date." We feel that attempting to</p>

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Bob Reeping	Allegheny Power	3	Negative	This standard has not successfully answered the question of who is required to be certified.
Michelle A Corley	Cleco Corporation	3	Affirmative	None
David A. Lapinski	Consumers Energy	3	Negative	We believe footnote (1) to be either unclear or incorrect as written. Of particular concern is the phrase "at that position". This can be taken literally to mean a qualified operator is required to sit behind the trainee. We believe the Trainee can be sufficiently supervised by a NERC Certified Operator who has the responsibility for overseeing the position and is monitoring the position.
Anthony L Wilson	Georgia Power Company	3	Negative	Ref R1-3 We believe the term "competency" should be changed to "capability" to more accurately reflect the purpose of the statement. The certification process assures that an operator is "capable" of performing reliability related tasks, not that the operator is "competent" in performing those tasks. In order to determine "competency", the operator would need to be observed over a long period of time to capture performance measures during various unexpected operating conditions. Therefore, the term "competency" should not be used in describing an operator who has simply been certified through the NERC System Operator Certification Program. Therefore we suggest changing the term "competency" to "capability" in each of the three requirements. We believe that listing the specific technical "Areas of Competency" under each requirement will be problematic and very hard to manage. By this method, in order to change a topic on the exam, you would also have to change the standard, creating a new SAR, comment period, ballot, and approval.

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Gwen S Frazier	Gulf Power Company	3	Negative	<p>Ref R1-3 We believe the term "competency" should be changed to "capability" to more accurately reflect the purpose of the statement. The certification process assures that an operator is "capable" of performing reliability related tasks, not that the operator is "competent" in performing those tasks. In order to determine "competency", the operator would need to be observed over a long period of time to capture performance measures during various unexpected operating conditions. Therefore, the term "competency" should not be used in describing an operator who has simply been certified through the NERC System Operator Certification Program. Therefore we suggest changing the term "competency" to "capability" in each of the three requirements. We believe that listing the specific technical "Areas of Competency" under each requirement will be problematic and very hard to manage. By this method, in order to change a topic on the exam, you would also have to change the standard, creating a new SAR, comment period, ballot, and approval. The technical capabilities are already listed in the exam and should be left there where they are more easily updated. Further issues with this draft listing the "Areas of Competency" are that each listed area is numbered as a sub-requirement of the standard, yet no measure exists that is related to each of these sub-requirements. This in effect creates an issue of how to determine compliance. Therefore, we suggest striking the entire sub-section "Areas of Competency" from each of the three requirements. However, if the drafting team chooses to keep these sections, we request the heading be changed to "Areas of Capability" (in line with our previous comment), that bullets be used instead of numbers, and that the list be moved to the appendix instead of being listed as a sub section in each of the three requirements. Ref M1-4 Again, in line with our previous comment , we request that "competency" be changed to "capability". M1.1 asks for a "list of Real-time operating positions". Those titles are unique to each entity that creates them and will undoubtedly vary across industry. This inconsistency will only lead to confusion during audits as each title will have to be explained for that specific entity. The specific position title should not matter as long as the entity can provide evidence of each operator's NERC certification and specific credentials. Therefore we suggest that M1.1 be removed from the list of measures. M1.2 requests a "list of System Operators assigned to its Real-time operating positions" while M1.4 requests "evidence showing which System Operators were assigned to work in Real-time operating positions." We feel that M1.2 is inherently present in M1.4, since the evidence provided in M1.4 will identify the list of Operators requested in M1.2, and therefore the two measures should be combined. To further clarify the term "NERC</p>

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Charles A. Freibert	Louisville Gas and Electric Co.	3	Negative	<p>Operators must successfully complete the NERC Reliability Operator or other appropriate NERC certification process. Including Areas of Competency in the requirements is at best superfluous and at worst confusing. If demonstration of minimum competency is different from the NERC certification process then criteria for demonstrating such competencies need to be set forth in R1, if not then the term should be removed from the requirements. E.ON U.S. suggests the wording of R1 (and R2 and R3 as appropriate) be revised to: 'Each Reliability Coordinator shall staff its real-time operating positions with System Operators who hold a valid NERC Reliability Operator certificate.' References to Areas of Competency and minimum competency relate to certification examination topics and are more appropriately set forth in documents directly related to the content and testing topics of the various certification examinations, e.g., NERC's Rules of Procedure."</p>
Don Horsley	Mississippi Power	3	Negative	<p>Ref R1-3 We believe the term "competency" should be changed to "capability" to more accurately reflect the purpose of the statement. The certification process assures that an operator is "capable" of performing reliability related tasks, not that the operator is "competent" in performing those tasks. In order to determine "competency", the operator would need to be observed over a long period of time to capture performance measures during various unexpected operating conditions. Therefore, the term "competency" should not be used in describing an operator who has simply been certified through the NERC System Operator Certification Program.</p>

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John S Bos	Muscatine Power & Water	3	Affirmative	MP&W appreciates the thoughtful consideration of the STD on this project.
Scott Peterson	San Diego Gas & Electric	3	Negative	1. The term "NERC System Operator Certification Program" needs to be defined. 2. In R2, "Transmission Operator reliability-related tasks" need to be clearly defined and/or identified. Additionally, the following insertions (in bold red) need to be made to the text: ". . . in the areas listed in R2.1 by obtaining and maintaining one of the following valid NERC certificates listed in R2.2". 3. Measures: How about emergency exceptions? The previous version of this standard, PER-003-0, allows for emergency exceptions in M1.2 during control center transfers. 4. Violation Severity Levels - there has to be some variations to VSLs. Currently, only Severe VSLs are defined. The previous version of this standard, PER-003-0, specified variations in the Levels of Non-Compliance.
James R. Keller	Wisconsin Electric Power Marketing	3	Affirmative	The NERC Reliability Standards Development Procedure requires that Data Retention indicate the Measurement to which it applies. Please make the correction that the Data Retention applies to M1.
Michael Ibold	Xcel Energy, Inc.	3	Negative	Xcel Energy votes negative, primarily because the standard continues to list competencies required, thought the entities have no control over what competencies are actually covered in the testing to obtain the certificates listed. The standard should be simple and uncluttered and list the certifications required for each functional entity. If there is a need to list competencies that are covered by the certification process, then the governing criteria for that certification process should be assigned that obligation.
David Frank Ronk	Consumers Energy	4	Negative	We believe footnote (1) to be either unclear or incorrect as written. Of particular concern is the phrase "at that position". This can be taken literally to mean a qualified operator is required to sit behind the trainee. We believe the Trainee can be sufficiently supervised by a NERC Certified Operator who has the responsibility for overseeing the position and is monitoring the position.
Joseph G. DePoorter	Madison Gas and Electric	4	Negative	I agree with the Requirements within the proposed Standard but do not agree with the expansion of the foot note concerning non NERC Certified System Operators. If

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	Co.			the foot note must be maintained, recommend that it read: "Non-NERC certified personnel in-training performing any reliability related tasks of a real-time operating position must be under the direct supervision of a NERC Certified System Operator; the NERC Certified System Operator at that operating position has ultimate responsibility for the performance of the reliability-related task." Rational: Non NERC certified personnel will never have the reliability related responsibilities as a NERC Certified System Operator; there are too many training responsibilities that must be accomplished, even for a NERC Certified System Operator. The SDT proposed foot note may be interpreted in a way that a NERC Certified System Operator must always be at a "station" and could never leave the "station" for any reason.
Henry E. LuBean	Public Utility District No. 1 of Douglas County	4	Negative	Competency requirements and measures are not stated properly and are too difficult to measure adequately. Competency should be determined based on whether certification has been obtained or not in this industry. Each entity must determine whether a person is qualified to work as a system operator and this should not be based on whether competency is declared by some number of hours obtained in a classroom; it would help in determining full qualification but not to prevent it; certification can help in determining qualification but an undefined competency rule just compounds the issue unnecessarily. As for VSLs, being certified (and competent?) or not may or may not directly affect the BPS (BES) and therefore should not be at the highest level; medium or lower would be better. This issue is not as black or white as is a SOL violation and shouldn't be held to the same level of violation or penalty.
Anthony Jankowski	Wisconsin Energy Corp.	4	Affirmative	"The NERC Reliability Standards Development Procedure requires that Data Retention indicate the Measurement to which it applies. Please make the correction that the Data Retention applies to M1."
Daniel Mason	City and County of San Francisco	5	Negative	As reflected in many pre-ballot comments, there is no need for competencies to be included in this standard. Registered Entities have no authority over the areas of competency demonstrated by obtaining and maintaining a valid NERC System Operator certificate. This standard should only require the applicable Registered Entity to staff its Real-time operating positions which are responsible for the control of the Bulk Electric System, with System Operators who possess the appropriate current and valid NERC System Operator certificate. Including competencies in PRC-003-1 only creates potential interpretation issues, added cost of compliance, with no obvious reliability benefit.
Stephanie Huffman	Cleco Power	5	Affirmative	None
James B Lewis	Consumers Energy	5	Negative	We believe footnote (1) to be either unclear or incorrect as written. Of particular concern is the phrase "at that position". This can be taken literally to mean a

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				qualified operator is required to sit behind the trainee. We believe the Trainee can be sufficiently supervised by a NERC Certified Operator who has the responsibility for overseeing the position and is monitoring the position.
Christopher Schneider	MidAmerican Energy Co.	5	Negative	MidAmerican believes that if wording about "positions performing Transmission Operator reliability-related tasks" cannot be included or the PER-003 standard effective date must be extended out beyond the current PER-005 date to avoid incorrectly advancing NERC compliance on reliability related tasks already identified in a FERC Order.
Richard Kinas	Orlando Utilities Commission	5	Affirmative	It is unclear as to what evidence is required to prove "demonstrated minimum competency" since this level of competency is not defined and is clearly up to interpretation. Additionally it would appear that by the wording of the main requirements, obtaining and maintaining a valid NERC certification itself demonstrates the minimum competencies (through use of the word "by") alleviating the need for the competencies sub-requirements. If evidence of system operators demonstrating minimum competencies is expected to be presented during a compliance audit, entities need to have a reasonable expectation of what will be expected. This is currently not the case.
Linda Horn	Wisconsin Electric Power Co.	5	Affirmative	The NERC Reliability Standards Development Procedure requires that Data Retention indicate the Measurement to which it applies. Please make the correction that the Data Retention applies to M1.
Robert Hirschak	Cleco Power LLC	6	Affirmative	None
Daryn Barker	Louisville Gas and Electric Co.	6	Negative	Operators must successfully complete the NERC Reliability Operator or other appropriate NERC certification process. Including Areas of Competency in the requirements is at best superfluous and at worst confusing. If demonstration of minimum competency is different from the NERC certification process then criteria for demonstrating such competencies need to be set forth in R1, if not then the term should be removed from the requirements. E.ON U.S. suggests the wording of R1 (and R2 and R3 as appropriate) be revised to: 'Each Reliability Coordinator shall staff its real-time operating positions with System Operators who hold a valid NERC Reliability Operator certificate.' References to Areas of Competency and minimum competency relate to certification examination topics and are more appropriately set forth in documents directly related to the content and testing topics of the various certification examinations, e.g., NERC's Rules of Procedure."
Joseph O'Brien	Northern Indiana Public Service Co.	6	Affirmative	Concerns of previous ballot have been addressed by SDT

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Alan R. Johnson	NRG Energy, Inc.	6	Negative	The standard fails to mention anything about restricting support personnel from being able to perform certain actions, such as control. EMS system support personnel can always use tools to manipulate database parameters, allowing themselves control ability. They all have database tools that are needed to manipulate systems in times of emergency support. The standard should address this.
Dennis Sismaet	Seattle City Light	6	Affirmative	Appropriate to change the language to indicate NERC certification as the requirement.
David F. Lemmons	Xcel Energy, Inc.	6	Negative	Xcel Energy votes negative, primarily because the standard continues to list competencies required, though the entities have no control over what competencies are actually covered in the testing to obtain the certificates listed. The standard should be simple and uncluttered and list the certifications required for each functional entity. If there is a need to list competencies that are covered by the certification process, then the governing criteria for that certification process should be assigned that obligation.
James A Maenner		8	Affirmative	Listing Areas of Competency and Certificates as requirements in the standard does not add much value. Necessary competencies and applicable certificates are described in the NERC System Operator Certification Program manual and are established through the ERO not by individuals required to be certified. In addition, including Areas of Competency and Certificates in the standard may require revisions to the standard when updated in the program.

END OF REPORT