

## Consideration of Comments on Initial Ballot — Certifying System Operators (Project 2007-04) Date of Initial Ballot: September 14-24, 2010

**Summary Consideration:** An initial ballot of PER-003-1 was conducted from September 14-24, 2010 and achieved a quorum with 92.73% of the ballot pool returning a ballot, and with a weighted segment approval of 79.17%.

The majority of the negative comments indicated that minimum competencies should not be included in the standard. FERC Order 693 contains a directive to modify the PER-003 standard to include minimum competencies. The “Areas of Competency” as used in the proposed standard represents the most efficient and effective method identified for meeting this FERC directive. The “Areas of Competency” identified in this standard are, by design, at a high enough level to ensure they will be included in any exam the NERC Certification Program will use both now and in the future. In addition, recertification through training will also touch upon one or more of these areas ensuring that anyone maintaining a valid NERC Certification has enhanced their ability to operate the Bulk Electric System.

Several balloters expressed concerns that the minimum competencies were not directly expressed in the measures. The “Areas of Competency” are implicitly included in the Measure M1 by the statement “demonstrated the applicable minimum competency by obtaining and maintaining the appropriate, valid NERC certificate”.

Several balloters indicated that Measure M1.1 and M1.2 are redundant to Measure M1.4 and therefore should be eliminated and that Measure M1.3 should only require the System Operator’s name and certificate number. Measures M1.1, M1.2, M1.3 and M1.4 are all necessary because entities have different job titles for their System Operators, and entities document their work schedules differently and that these measures would ensure the evidence was sufficient to prove compliance. Regarding the comment suggesting that measure M1.3 should only require the System Operator’s name and certificate number, the present wording allows for either “a copy of each of its System Operator’s NERC Certificate” OR “NERC certificate number with expiration date”. The wording of the measure allows an audited entity to determine the method of demonstrating compliance that best suits its needs. The Measure, as presently worded, allows an entity to use the method proposed by balloters.

Several balloters questioned the formatting used in the Requirements. The formatting used in the Requirements of the proposed standard is consistent with the guidance provided by NERC staff. Sub-requirements are no longer preceded by a capital, “R” and are now called, “Parts” of a requirement, rather than “Sub-requirements.”

Some balloters indicated that the term “System Operator” either should not be used in the standard or should be re-defined to exclude Generator Operators in the NERC Glossary definition. While the definition of the term System Operator in the NERC Glossary includes the parenthetical expression “(Balancing Authority, Transmission Operator, Generator Operator, Reliability Coordinator),” the applicability of the standard is clearly stated to be Reliability Coordinator, Balancing Authority, and Transmission Operator. In addition, there is a separate effort underway to remove “Generator Operator” from the definition of “System Operator.”

A couple balloters indicated that the footnote, as written, was either unclear or incorrect. Their particular concern was with the phrase “at that position” because it could be taken literally to mean a qualified operator is required to sit behind the trainee. The SDT intended the footnote to clarify that each individual in training must work under the immediate direction of the System Operator who holds a valid NERC certificate, located at the Real-time operating position and responsible for performing reliability-related tasks. This is necessary to ensure that all potential threats to the Bulk Electric System that occur simultaneously at one or more operating positions are managed by an operator possessing the minimum competencies to respond to the situation reliably. In addition, a few balloters wanted the footnote either removed or re-worded to read “The NERC Certified System Operator has ultimate responsibility for the performance of the reliability-related tasks”. The requested change could lead to the assumption that the intent of the footnote was to allow for one certification to cover more than one person performing reliability-related tasks.

Some entities could assume that the shift supervisor in a multi-person control room would be the only one required to hold a valid NERC certification and that the others in the room worked directly under that person’s supervision. This is not what was intended. Each System Operator filling a real-time position that performs reliability-related tasks must hold a valid NERC certificate. This is necessary to ensure that all potential threats to the Bulk Electric System that occur simultaneously at one or more desks are managed by a System Operator possessing the minimum competencies to respond to the situation reliably. Making the suggested modification would reduce clarity. The standard clearly identifies the operating position through the use of the phrase “Real-time operating positions performing (applicable entity) reliability-related tasks”. However, the SDT modified the footnote to provide further clarity. The footnote now reads “Non-NERC certified personnel performing any reliability-related task of a real-time operating position must be under the direct supervision of a NERC Certified System Operator stationed at that operating position; the NERC Certified System Operator at that operating position has ultimate responsibility for the performance of the reliability-related tasks.”

A few balloters indicated that the ERO should be required to create and maintain a certification program that meets the minimum competencies identified within the standard and recommended removing the competencies from the standard. NERC, as the ERO, currently provides the System Operator Certification Program on which this standard is based. This certification program, by design, is autonomous and already included in the NERC Rules of Procedure. Placing a requirement in this standard for the ERO to provide this System Operator Certification Program would compromise the autonomy of the certification program and weaken it.

A couple balloters wanted to change the phrase “performing reliability-related tasks” to “meeting its functional obligations”. The phrase “meeting its functional obligations” as described in the functional model, could include tasks that are not reliability-related and also tasks that are not required to be performed by System Operators. The SDT did not, therefore revise the standard in support of this suggestion.

Another couple of balloters indicated that this draft standard should contain variations in the VSLs. The requirements are binary in that the System Operator either holds the appropriate, valid certificate or does not. The Real-time operation of the power system is dynamic and the intent of this requirement is to ensure that there is a System Operator with at least a minimum set of competencies sitting in each RC, TOP, and BA control room at all times.

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, Herbert Schrayshuen, at 609-452-8060 or at herb.schrayshuen@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.<sup>1</sup>

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.

**Response:** The SDT believes that the standard clearly states “...System Operators performing the reliability-related tasks of the Reliability Coordinator, Balancing Authority and Transmission Operator...” must hold the appropriate, valid NERC certificate. Operating position titles can vary from entity to entity; therefore, the SDT feels the entity itself must identify those operating positions that perform Real-time reliability-related tasks.

<sup>1</sup> The appeals process is in the Reliability Standards Development Procedure: [http://www.nerc.com/files/RSDP\\_V6\\_1\\_12Mar07.pdf](http://www.nerc.com/files/RSDP_V6_1_12Mar07.pdf).  
November 30, 2010

Voter	Entity	Segment	Vote	Comment
John Bussman	Associated Electric Cooperative, Inc.	1	Negative	<p>Associated Electric Cooperative Inc (AECI) agrees with what it believes to be the intent of Footnote 1. However, a strict letter of the law interpretation of the proposed wording might result in undesirable consequences. It would seem the footnote, as written, could be construed so that supervision would be required for only those trainees holding certification from an entity other than NERC. Trainees with no certification whatsoever would not be covered by the footnote and, therefore, no supervision would be required.</p> <p>Also, some initial training for potential System Operators could be “learning the tasks of a real-time operating position”, in a classroom or self study setting. This would not require direct supervision of a NERC Certified System Operator.</p> <p>AECI suggests some of the language from Measure M1.1 of the current standard could be incorporated to something like, “While in training, personnel without proper NERC certification may not perform any tasks of a real-time operating position except under the direct, continuous supervision and observation of the NERC Certified System Operator at that operating position. The NERC Certified System Operator at that operating position has ultimate responsibility for the performance of the reliability-related tasks.”</p>
<p><b>Response:</b> The scope of this standard is limited to NERC certification. Therefore, the SDT has only addressed whether an individual is NERC certified or not NERC certified.</p> <p>The standard is not applicable to training provided in a classroom or self study setting. This standard only applies to Real-time operating positions performing reliability-related tasks.</p> <p>Your proposed wording from Measure M1.1 of the current standard introduces the possibility that an entity could misinterpret the standard to mean that if a non-NERC certified person performing the task has been determined by the entity to be fully trained, that trainee would not require “direct, continuous supervision and observation” to perform Real-time reliability-related tasks. The SDT feels that the revised footnote has sufficient clarity that would prohibit this situation. The present wording of the revised footnote is “Non-NERC certified personnel performing any reliability-related task of a real-time operating position must be under the direct supervision of a NERC Certified System Operator stationed at that operating position; the NERC Certified System Operator at that operating position has ultimate responsibility for the performance of the reliability-related tasks.”</p>				

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Scott Kinney	Avista Corp.	1	Negative	<p>Avista generally supports the modified standard but strongly believes that the addition of the competency section adds significant confusion and provides no value.</p> <p>There are no measures in the standard that address the competency requirements so the language doesn't add value. System Operator competency requirements are already addressed and measured in the NERC certification process and PER-005-1.</p>
<p><b>Response:</b> FERC Order 693 contains a directive to modify the PER-003 standard to include minimum competencies. The SDT believes that the "Areas of Competency" as used in the proposed standard represents the most efficient and effective method of meeting this FERC directive. The drafting team believes that the NERC Certification program provides the foundation for the minimum competency that a person must possess to operate the Bulk Electric System reliably. The "Areas of Competency" identified in this standard are, by design, at a high enough level to ensure they will be included in any exam the NERC Certification Program would use both now and in the future. In addition, recertification through training would also touch upon one or more of these areas ensuring that anyone maintaining a valid NERC Certification has enhanced their ability to operate the Bulk Electric System.</p> <p>You are correct that the "Areas of Competency" are not explicitly included in the Measure M1. However, the SDT believes that the "Areas of Competency" are implicitly included in Measure M1 by the statement "demonstrated the applicable minimum competency by obtaining and maintaining the appropriate, valid NERC certificate".</p>				
Tony Kroskey	Brazos Electric Power Cooperative, Inc.	1	Negative	Additional clarification is needed.
<p><b>Response:</b> The SDT thanks you for your comment. However, your comment does contain enough information for the SDT to respond.</p>				

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Gordon Pietsch	Great River Energy	1	Negative	<p>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.</p> <p>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.</p>
<p><b>Response:</b> While the definition of the term System Operator in the NERC Glossary includes the parenthetical expression "(Balancing Authority, Transmission Operator, Generator Operator, Reliability Coordinator)," the applicability of the standard is clearly stated to be Reliability Coordinator, Balancing Authority, and Transmission Operator. In addition, there is another effort underway to revise the definition of System Operator to remove the reference to "Generator Operator."</p> <p>NERC, the ERO, currently provides the System Operator Certification program on which this standard is based. This program, by design, is autonomous. This program is already included in the NERC Rules of Procedure. Placing a requirement in a standard for the ERO to provide this System Operator Certification program compromises the autonomy of this program and weakens it. The "Areas of Competency" identified in this standard are, by design, at a high enough level to ensure they will be included in any exam the NERC Certification Program would use both now and in the future. In addition, recertification through training would also touch upon one or more of these areas ensuring that anyone maintaining a valid NERC Certification has enhanced their ability to operate the Bulk Electric System.</p>				

Consideration of Comments on Initial Ballot of PER-003-1 – Operating Personnel Credentials (Project 2007-04)

Voter	Entity	Segment	Vote	Comment
Michael Moltane	International Transmission Company Holdings Corp	1	Negative	ITC is concerned with the use of the term "reliability-related tasks" in R2 and M1, a term also used in PER-005. By this going into place prior to PER - 005 implementation we may be forced to identify our reliability-related tasks a year earlier than PER-005 mandate.
<b>Response:</b> The SDT thanks you for your comment. However, regulatory approval and subsequent implementation of the reliability standard is outside the control of the SDT.				
Terry Harbour  Christopher Schneider	MidAmerican Energy Co.	1  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.
<b>Response:</b> The SDT thanks you for your comment. However, regulatory approval and subsequent implementation of the reliability standard is outside the control of the SDT.				

Voter	Entity	Segment	Vote	Comment
Lawrence R. Larson	Otter Tail Power Company	1	Negative	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>
<p><b>Response:</b> The drafting team believes that the NERC System Operator Certification Program provides the foundation for the minimum competency that a person must possess to operate the Bulk Electric System reliably. With this in mind, the drafting team believes the purpose statement " To ensure that System Operators performing the reliability-related tasks of the Reliability Coordinator, Balancing Authority and Transmission Operator are certified through the NERC System Operator Certification Program when filling a Real-time operating position responsible for control of the Bulk Electric System" is clear.</p>				

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				<p>Note that while the first version of the System Operator Certification test was focused on recall or knowledge questions, and focused primarily on recall of Operating Policies, as the test has evolved there are more “application” type questions that do assess a System Operator’s ability to apply fundamental knowledge of dynamic operations to real-life operating scenarios to assess some aspects of the individual’s competence. No paper-and-pencil test can accurately assess the level of competence required to assume all the responsibilities of a System Operator – this level of competence is addressed in PER-005-1-System Personnel Training. The requirements in PER-003-1 focus on “minimum competencies” and those competencies were identified by administering a continent-wide job and task analysis.</p> <p>You are correct that the “Areas of Competency” are not explicitly included in the Measure M1. However, the SDT believes that the “Areas of Competency” are implicitly included in the Measure M1 by the statement “demonstrated the applicable minimum competency by obtaining and maintaining the appropriate, valid NERC certificate”.</p> <p>The “Areas of Competency” identified in this standard are, by design, at a high enough level to ensure they will be included in any exam the NERC Certification Program would use both now and in the future. In addition, recertification through training would also touch upon one or more of these areas ensuring that anyone maintaining a valid NERC Certification has enhanced their ability to operate the Bulk Electric System. The drafting team also believes that experience, training, and skills demonstrations beyond the achievement of NERC Certification is a good business practice that is fulfilled by the recertification through the NERC Continuing Education Program in use by the NERC Certification Program.</p> <p>FERC Order 693 contains a directive to modify the PER-003 standard to include minimum competencies. The SDT believes that the “Areas of Competency” as used in the proposed standard represents the most efficient and effective method of meeting this FERC directive.</p>

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Catherine Koch	Puget Sound Energy, Inc.	1	Negative	<p>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.</p> <p>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.</p> <p>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.</p> <p>Finally, a small issue is that the subsections to the requirements are not labeled with a preceeding "R" for consistency with other standards.</p>
<p><b>Response:</b> The drafting team believes that the NERC System Operator Certification Program provides the foundation for the minimum competency that a person must possess to operate the Bulk Electric System reliably. With this in mind, the drafting team believes the purpose statement " To ensure that System Operators performing the reliability-related tasks of the Reliability Coordinator, Balancing Authority and Transmission Operator are certified through the NERC System Operator Certification Program when filling a Real-time operating position responsible for control of the Bulk Electric System" is clear.</p> <p>NERC, the ERO, currently provides the System Operator Certification program on which this standard is based. This program, by design, is autonomous. This program is already included in the NERC Rules of Procedure. Placing a requirement in a standard for the ERO to provide this System Operator Certification program compromises the autonomy of this program and weakens it. The "Areas of Competency" identified in this standard are, by design, at a high enough level to ensure they will be included in any exam the NERC Certification Program would use both now and in the future. In addition, recertification through training would also touch upon one or more of these areas ensuring that anyone maintaining a valid NERC Certification has enhanced their ability to operate the Bulk Electric System.</p> <p>The term NERC System Operator Certification Program is capitalized in the standard because it is the Title of the program in use by NERC for certifying system operators. The terms "Reliability Operator, "Balancing, Interchange and Transmission Operator" and "Balancing and</p>				

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<p>Interchange Operator” are capitalized in the standard because they are the Titles of the certificates used by the NERC System Operator Certification Program. While this capitalization may not be consistent with the grammar rules for NERC Standards, it is consistent with the rules of grammar for the English language.</p> <p>The SDT thanks you for noticing the error between the two footnotes. The SDT has reworded the footnote to provide additional clarity. The present wording of the revised footnote is “Non-NERC certified personnel performing any reliability-related task of a real-time operating position must be under the direct supervision of a NERC Certified System Operator stationed at that operating position; the NERC Certified System Operator at that operating position has ultimate responsibility for the performance of the reliability-related tasks.”</p> <p>The SDT appreciates your comments concerning the formatting used in the proposed draft standard. However, the formatting used in this draft standard is consistent with the guidance provided by NERC staff. Sub-requirements are no longer preceded by a capital, “R” and are now called, “Parts” of a requirement, rather than “Sub-requirements.”</p>				
Richard McLeon	South Texas Electric Cooperative	1	Negative	STEC feels that all Reliability Coordinators, Transmission Operators, and Balancing Authorities should staff their real-time operating positions with System Operators who have demonstrated minimum competency by obtaining and maintaining a valid NERC Reliability Operator certificate.
<p><b>Response:</b> The SDT recognizes that there are various organizational structures for the Real-time operating positions performing reliability-related tasks on the BES. This standard has been designed to fully utilize the flexibility provided by the NERC Certification Program.</p>				
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.
<p><b>Response:</b> FERC Order 693 contains a directive to modify the PER-003 standard to include minimum competencies. The SDT believes that the “Areas of Competency” as used in the proposed standard represents the most efficient and effective method of meeting this FERC directive. The drafting team believes that the NERC Certification program provides the foundation for the minimum competency that a person must possess to operate the Bulk Electric System reliably. The “Areas of Competency” identified in this standard are, by design, at a high enough level to ensure they will be included in any exam the NERC Certification Program would use both now and in the future. In addition, recertification through training would also touch upon one or more of these areas ensuring that anyone maintaining a</p>				

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<p>valid NERC Certification has enhanced their ability to operate the Bulk Electric System.</p>				
Jason L Marshall	Midwest ISO, Inc.	2	Negative	<p>The phrase "performing Reliability Coordinator reliability-related tasks" is a concern. We suggest to use the phrase "meeting its functional obligations" instead. The new version of EOP-008 uses similar wording to our proposal. In this way, it ties to what reliability tasks the standard applies directly back to the functional model.</p> <p>Furthermore, the functional model contains a list of reliability tasks. The competencies areas should apply to the ERO since it manages the certification program. Then there should be a requirement for functional entities to have NERC certified System Operators. This will ensure that the certification program only certifies that operators meet these competencies. The way the standard is currently written could allow the certification program to be deficient in some of the areas of competencies. There is a precedent that the new results based approach allows standards to have requirements that apply to the ERO. See the recently posted Project 2009-01 Impact Event and Disturbance Assessment, Analysis, and Reporting.</p>
<p><b>Response:</b> The wording "meeting its functional obligations" as described in the functional model, may include tasks that are not reliability-related and also tasks that are not required to be performed by System Operators; therefore the SDT does not see a need to revise the standard.</p> <p>NERC, the ERO, currently provides the System Operator Certification program on which this standard is based. This program, by design, is autonomous. This program is already included in the NERC Rules of Procedure. Placing a requirement in a standard for the ERO to provide this System Operator Certification program compromises the autonomy of this program and weakens it. The "Areas of Competency" identified in this standard are, by design, at a high enough level to ensure they will be included in any exam the NERC Certification Program would use both now and in the future. In addition, recertification through training would also touch upon one or more of these areas ensuring that anyone maintaining a valid NERC Certification has enhanced their ability to operate the Bulk Electric System.</p>				
Bob Reeping	Allegheny Power	3	Negative	<p>This standard has not successfully answered the question of who is required to be certified.</p>
<p><b>Response:</b> The SDT believes that the standard clearly states "...System Operators performing the reliability-related tasks of the Reliability Coordinator, Balancing Authority and Transmission Operator..." must hold the appropriate, valid NERC certificate. Operating position titles can vary from entity to entity; therefore, the SDT feels the entity itself must identify those operating positions that perform Real-time reliability-related tasks.</p>				

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Horace Stephen Williamson	Southern Company Services, Inc.	1	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.</p> <p>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.</p> <p>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.</p> <p>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</p>
Richard J. Mandes	Alabama Power Company	3		
Anthony L Wilson	Georgia Power Company	3		
Gwen S Frazier	Gulf Power Company	3		
Don Horsley	Mississippi Power	3		

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				<p>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.</p> <p>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 &amp; expiration date for each System Operator.”</p> <p>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 measure numbering to directly reflect the corresponding requirement numbering.</p>
<p><b>Response:</b> FERC Order 693 contains a directive to modify the PER-003 standard to include minimum competencies. The SDT believes that the “Areas of Competency” as used in the proposed standard represents the most efficient and effective method of meeting this FERC directive. The drafting team believes that the NERC Certification program provides the foundation for the minimum competency that a person must possess to operate the Bulk Electric System reliably. The “Areas of Competency” identified in this standard are, by design, at a high enough level to ensure they will be included in any exam the NERC Certification Program would use both now and in the future. In addition, recertification through training would also touch upon one or more of these areas ensuring that anyone maintaining a valid NERC Certification has enhanced their ability to operate the Bulk Electric System.</p> <p>You are correct that the “Areas of Competency” are not explicitly included in the Measure M1. However, the SDT believes that the “Areas of Competency” are implicitly included in the Measure M1 by the statement “demonstrated the applicable minimum competency by obtaining and maintaining the appropriate, valid NERC certificate”.</p> <p>The SDT appreciates your comments concerning the formatting used in the proposed draft standard. However, the formatting used in this draft standard is consistent with the guidance provided by NERC staff. Sub-requirements are no longer preceded by a capital, “R” and are now called, “Parts” of a requirement, rather than “Sub-requirements.”</p>				

Voter	Entity	Segment	Vote	Comment
<p>The SDT believes that Measures M1.1, M1.2, M1.3 and M1.4 are necessary because entities document their position titles and work schedules differently and this ensures that evidence is sufficient to prove compliance.</p> <p>M1.3 allows for either “a copy of each of its System Operator’s NERC Certificate” OR “NERC certificate number with expiration date”. This was done to allow the entity being audited to determine the method that best suits their needs. As written, the entity can choose the method you suggest of maintaining a list of NERC certificate numbers and the issuance/expiration dates associated.</p> <p>The SDT was given the title of the standard through the SAR process. The SDT believes that the title is appropriate with the content of the standard.</p>				
<p>Charles A. Freibert</p> <p>Daryn Barker</p>	<p>Louisville Gas and Electric Co.</p>	<p>3</p> <p>6</p>	<p>Negative</p>	<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>
<p><b>Response:</b> FERC Order 693 contains a directive to modify the PER-003 standard to include minimum competencies. The SDT believes that the “Areas of Competency” as used in the proposed standard represents the most efficient and effective method of meeting this FERC directive. The drafting team believes that the NERC Certification program provides the foundation for the minimum competency that a person must possess to operate the Bulk Electric System reliably. The “Areas of Competency” identified in this standard are, by design, at a high enough level to ensure they will be included in any exam the NERC Certification Program would use both now and in the future. In addition, recertification through training would also touch upon one or more of these areas ensuring that anyone maintaining a valid NERC Certification has enhanced their ability to operate the Bulk Electric System.</p>				
<p>John S Bos</p>	<p>Muscatine Power &amp; Water</p>	<p>3</p>	<p>Negative</p>	<p>There is no way for a Registered Entity to ensure minimum competencies are obtained through a NERC Certification test. NERC controls what is on each individual test, not the Registered Entity. To put the burden of obtaining minimum competency on the Registered Entity based on what is on the NERC Certification test, simply is unjust.</p>

Voter	Entity	Segment	Vote	Comment
<p><b>Response:</b> FERC Order 693 contains a directive to modify the PER-003 standard to include minimum competencies. The SDT believes that the "Areas of Competency" as used in the proposed standard represents the most efficient and effective method of meeting this FERC directive. The drafting team believes that the NERC Certification program provides the foundation for the minimum competency that a person must possess to operate the Bulk Electric System reliably. The "Areas of Competency" identified in this standard are, by design, at a high enough level to ensure they will be included in any exam the NERC Certification Program would use both now and in the future. In addition, recertification through training would also touch upon one or more of these areas ensuring that anyone maintaining a valid NERC Certification has enhanced their ability to operate the Bulk Electric System.</p>				
<p>Scott Peterson</p>	<p>San Diego Gas &amp; Electric</p>	<p>3</p>	<p>Negative</p>	<ol style="list-style-type: none"> <li>1. The term "NERC System Operator Certification Program" needs to be defined.</li> <li>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".</li> <li>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.</li> <li>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.</li> </ol>
<p><b>Response:</b> The NERC System Operator Certification Program is a defined program in both the Rules of Procedure Section 600 &amp; Appendix 6, System Operator Certification Program Manual.</p> <p>The SDT believes that reliability-related tasks can vary from entity to entity, so the entity itself must identify the tasks that it considers to be reliability-related. While the SDT appreciates your suggestion, the SDT does not believe that making the modification you are suggesting would provide any additional clarity.</p> <p>The drafting team believes that the transition to the backup control center is covered by EOP-008-0 Requirement R1.8 and in EOP-008-1 Requirements R1, R3 and R4.</p> <p>The SDT feels that the Requirement is binary in that the System Operator either holds the appropriate, valid certificate or does not. The SDT believes that the Real-time operation of the power system is dynamic and the intent of this requirement is to ensure that there is a System Operator with a minimum set of competencies sitting in each RC, TOP, and BA control room at all times.</p>				

Voter	Entity	Segment	Vote	Comment
Kenneth Goldsmith	Alliant Energy Corp. Services, Inc.	4	Negative	<p>The definition of System Operator includes "Generator Operator", however Generator Operators is not included 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 to not be applicable for this standard, to remove any ambiguity in the implementation of this standard.</p> <p>The requirements regarding the minimum competencies are misapplied to the functional entities. They should apply to the ERO. The ERO should be required to create and maintain a certification program that meets the minimum competencies identified within the standard. Then the functional entities should simply be required to staff their System Operator positions with personnel who have become certified and maintain that certification through NERC.</p>
<p><b>Response:</b> While the definition of the term System Operator in the NERC Glossary includes the parenthetical expression "(Balancing Authority, Transmission Operator, Generator Operator, Reliability Coordinator)," the applicability of the standard is clearly stated to be Reliability Coordinator, Balancing Authority, and Transmission Operator. In addition, there is a separate project underway working to revise the definition of "System Operator" to remove the reference to "Generator Operator."</p> <p>NERC, the ERO, currently provides the System Operator Certification program on which this standard is based. This program, by design, is autonomous. This program is already included in the NERC Rules of Procedure. Placing a requirement in a standard for the ERO to provide this System Operator Certification program compromises the autonomy of this program and weakens it. The "Areas of Competency" identified in this standard are, by design, at a high enough level to ensure they will be included in any exam the NERC Certification Program would use both now and in the future. In addition, recertification through training would also touch upon one or more of these areas ensuring that anyone maintaining a valid NERC Certification has enhanced their ability to operate the Bulk Electric System.</p>				

Voter	Entity	Segment	Vote	Comment
Joseph G. DePoorter	Madison Gas and Electric Co.	4	Negative	<p>Recommends that the SDT changes “performing reliability-related tasks” to “meeting its functional obligations” to reflect recent changes made to other approved standards.</p> <p>In addition, the definition of “System Operator” includes “Generator Operator”, however generator operators are not covered in any specific requirement in the standard. 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. Would also like to point out the Generator Operator is the Registered Entity that meet the obligations set in the NERC Statement of Compliance Registry Criteria (Revision 5.0) and not a person operating a generator.</p> <p>Recommends that the requirements regarding the “minimum competencies” are misapplied to the functional entities. As stated in R1, R2, and R3 a System operator has to demonstrate minimum competencies that are obtained by a valid NERC Reliability Operator certificate. Applicable entities have no ability to know if these “areas of Competency” are adequately addressed within the NERC Certification Program (the test) or not. If the SDT believes that System Operators require a valid NERC Certificate to operate a Real-time position responsible for control of the BES, it should be simply stated.</p>
<p><b>Response:</b> The wording “meeting its functional obligations” as described in the functional model, may include tasks that are not reliability-related and also tasks that are not required to be performed by System Operators; therefore the SDT does not see a need to revise the standard.</p> <p>While the definition of the term System Operator in the NERC Glossary includes the parenthetical expression “(Balancing Authority, Transmission Operator, Generator Operator, Reliability Coordinator),” the applicability of the standard is clearly stated to be Reliability Coordinator, Balancing Authority, and Transmission Operator. In addition, there is a separate project underway working to revise the definition of “System Operator” to remove the reference to “Generator Operator.”</p> <p>FERC Order 693 contains a directive to modify the PER-003 standard to include minimum competencies. The SDT believes that the “Areas of Competency” as used in the proposed standard represents the most efficient and effective method of meeting this FERC directive. The drafting team believes that the NERC Certification program provides the foundation for the minimum competency that a person must possess to operate the Bulk Electric System reliably. The “Areas of Competency” identified in this standard are, by design, at a high enough level to ensure they will be included in any exam the NERC Certification Program would use both now and in the future. In addition, recertification through training would also touch upon one or more of these areas ensuring that anyone maintaining a valid NERC Certification has enhanced their ability to operate the Bulk Electric System.</p>				

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Henry E. LuBean	Public Utility District No. 1 of Douglas County	4	Negative	<p>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.</p> <p>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.</p>
<p><b>Response:</b> FERC Order 693 contains a directive to modify the PER-003 standard to include minimum competencies. The SDT believes that the "Areas of Competency" as used in the proposed standard represents the most efficient and effective method of meeting this FERC directive. The drafting team believes that the NERC Certification program provides the foundation for the minimum competency that a person must possess to operate the Bulk Electric System reliably. The "Areas of Competency" identified in this standard are, by design, at a high enough level to ensure they will be included in any exam the NERC Certification Program would use both now and in the future. In addition, recertification through training would also touch upon one or more of these areas ensuring that anyone maintaining a valid NERC Certification has enhanced their ability to operate the Bulk Electric System.</p> <p>The SDT feels that the Requirement is binary in that the System Operator either holds the appropriate, valid certificate or does not. The SDT based the Violation Severity Level on the VSL Guidelines, Guideline 2 which states "A violation of a "binary" type requirement must be a "Severe" VSL." VRFs assess the criticality of a requirement with respect to reliability – VSLs assess the degree of noncompliance.</p>				
Daniel Mason	City and County of San Francisco	5	Negative	<p>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.</p>

Voter	Entity	Segment	Vote	Comment
<p><b>Response:</b> FERC Order 693 contains a directive to modify the PER-003 standard to include minimum competencies. The SDT believes that the "Areas of Competency" as used in the proposed standard represents the most efficient and effective method of meeting this FERC directive. The drafting team believes that the NERC Certification program provides the foundation for the minimum competency that a person must possess to operate the Bulk Electric System reliably. The "Areas of Competency" identified in this standard are, by design, at a high enough level to ensure they will be included in any exam the NERC Certification Program would use both now and in the future. In addition, recertification through training would also touch upon one or more of these areas ensuring that anyone maintaining a valid NERC Certification has enhanced their ability to operate the Bulk Electric System.</p>				
David A. Lapinski	Consumers Energy	3	Negative	<p>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.</p>
David Frank Ronk		4		
James B Lewis		5		
<p><b>Response:</b> The SDT intended the footnote to clarify that each trainee must work under the immediate direction of the System Operator who holds a valid NERC certificate, located at the Real-time operating position and responsible for performing reliability-related tasks. This is necessary to ensure that all potential threats to the Bulk Electric System that occur simultaneously at one or more operating positions are managed by an operator possessing the minimum competencies to respond to the situation reliably.</p> <p>Based on stakeholder comments, the SDT has revised the footnote to provide additional clarity. The present wording of the revised footnote is "Non-NERC certified personnel performing any reliability-related task of a real-time operating position must be under the direct supervision of a NERC Certified System Operator stationed at that operating position; the NERC Certified System Operator at that operating position has ultimate responsibility for the performance of the reliability-related tasks."</p>				
Martin Bauer P.E.	U.S. Bureau of Reclamation	5	Negative	<p>The standard language is not consistent with the definition of System Operator. System Operator includes Generator Operator. The standard did not modify the definition of the System Operator to eliminate the inconsistency.</p>
<p><b>Response:</b> While the definition of the term System Operator in the NERC Glossary includes the parenthetical expression "(Balancing Authority, Transmission Operator, Generator Operator, Reliability Coordinator)," the applicability of the standard is clearly stated to be Reliability Coordinator, Balancing Authority, and Transmission Operator. In addition, there is a separate project underway working to revise the definition of "System Operator" to remove the reference to "Generator Operator."</p>				

Voter	Entity	Segment	Vote	Comment
Paul B. Johnson	American Electric Power	1	Negative	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.
Raj Rana	American Electric Power	3		
Brock Ondayko	AEP Service Corp.	5		
Edward P. Cox	AEP Marketing	6		
<p><b>Response:</b> Your requested change could lead to the assumption that the intent of the footnote was to allow for one certification to cover more than one person performing reliability-related tasks. For example, some could assume that the Supervisor in a multi-person control room would be the only one required to hold a valid NERC certification and that the others in the room could work directly under that person's supervision. This is not what this drafting team intended. Each System Operator filling a real-time position that performs reliability-related tasks must hold a NERC certificate. This is necessary to ensure that all potential threats to the Bulk Electric System that occur simultaneously at one or more desks are managed by a System Operator possessing the minimum competencies to respond to the situation reliably.</p> <p>The SDT feels making the suggested modification would reduce clarity. The SDT believes the standard clearly identifies the meaning of "operating position" through the use of the phrase "Real-time operating positions performing (applicable entity) reliability-related tasks". However, the SDT modified the footnote to provide further clarity. The footnote now reads "Non-NERC certified personnel performing any reliability-related task of a real-time operating position must be under the direct supervision of a NERC Certified System Operator stationed at that operating position; the NERC Certified System Operator at that operating position has ultimate responsibility for the performance of the reliability-related tasks."</p>				
Joseph O'Brien	Northern Indiana Public Service Co.	6	Negative	See comments submitted under "Posted for Comment"
<p><b>Response:</b> The SDT thanks you for your comment. Please refer to the SDT's responses to your comments referenced.</p>				
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.

Voter	Entity	Segment	Vote	Comment
<p><b>Response:</b> This standard applies to Real-time operating positions. Support personnel should be prohibited by the responsible entity from operating any equipment in Real-time in accordance with the CIP standards.</p>				
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.
Michael Ibold		3		
David F. Lemmons		6		
<p><b>Response:</b> FERC Order 693 contains a directive to modify the PER-003 standard to include minimum competencies. The SDT believes that the "Areas of Competency" as used in the proposed standard represents the most efficient and effective method of meeting this FERC directive. The drafting team believes that the NERC Certification program provides the foundation for the minimum competency that a person must possess to operate the Bulk Electric System reliably. The "Areas of Competency" identified in this standard are, by design, at a high enough level to ensure they will be included in any exam the NERC Certification Program would use both now and in the future. In addition, recertification through training would also touch upon one or more of these areas ensuring that anyone maintaining a valid NERC Certification has enhanced their ability to operate the Bulk Electric System.</p>				
John J. Moraski	Baltimore Gas & Electric Company	1	Affirmative	(See comment form for BGE comments)
<p><b>Response:</b> The SDT thanks you for your affirmative response and clarifying comment. Please refer to the SDT's response to the aforementioned comments.</p>				
Frank F. Afranji	Portland General Electric Co.	1	Affirmative	I agree with the changes proposed.
<p><b>Response:</b> The SDT thanks you for your affirmative response and clarifying comment.</p>				
Richard J Kafka	Potomac Electric Power Co.	1	Affirmative	There are some minor improvements possible: Section 2.1 should be renamed "Reliability-related Tasks" and the subjects "Protection and Control" and "Voltage and Reactive" should be more specific.
<p><b>Response:</b> FERC Order 693 contains a directive to modify the PER-003 standard to include minimum competencies. The SDT believes that the "Areas of Competency" as used in the proposed standard represents the most efficient and effective method of meeting this FERC directive. The drafting team believes that the NERC Certification program provides the foundation for the minimum competency that a person must possess to operate the Bulk Electric System reliably. The "Areas of Competency" identified in this standard are, by design, at a high</p>				

Voter	Entity	Segment	Vote	Comment
<p>enough level to ensure they will be included in any exam the NERC Certification Program would use both now and in the future. In addition, recertification through training would also touch upon one or more of these areas ensuring that anyone maintaining a valid NERC Certification has enhanced their ability to operate the Bulk Electric System. Note that the topics listed under the "Areas of Competency" in the standard are identical to the content areas identified in the associated certification exam.</p>				
Richard Salgo	Sierra Pacific Power Co.	1	Affirmative	<p>In boiling down each of the three requirements, it is clear that the metric of compliance with each is that the System Operator obtain and maintain a valid NERC certification. The language, however, indicates that the System Operator must have "demonstrated minimum competency" in various areas. It is understood that this is a requirement of FERC Order 693, yet we are concerned that some yet to be defined demonstration criteria may be required in subsequent compliance audits beyond the mere evidence of certification. We would like clarification that audit evidence of compliance with this Standard will be limited to the specific items in section M1.1 through M1.4.</p>
<p><b>Response:</b> The SDT thanks you for your affirmative response and clarifying comment. The SDT believes that the requirement's phrase, ". . . System Operators who have demonstrated minimum competency in the areas listed by obtaining and maintaining a valid NERC . . . certificate" is clear that the metric for demonstrating competency is the applicable certificate.</p>				
Ballard Keith Mutters	Orlando Utilities Commission	3	Affirmative	<p>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.</p>
<p><b>Response:</b> The SDT believes that the requirement's phrase, ". . . System Operators who have demonstrated minimum competency in the areas listed by obtaining and maintaining a valid NERC . . . certificate" is clear that the metric for demonstrating competency is the applicable certificate. In addition, the SDT has modified the Measure M1.3 to provide clarification. The Measure M1.3 now reads "A copy of each of its System Operator's NERC certificate or NERC certificate number with expiration date which demonstrates compliance with the applicable Areas of Competency".</p>				

Voter	Entity	Segment	Vote	Comment
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 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.
Richard Kinas		5	Affirmative	
<p><b>Response:</b> The SDT believes that the requirement's phrase, ". . . System Operators who have demonstrated minimum competency in the areas listed by obtaining and maintaining a valid NERC . . . certificate" is clear that the metric for demonstrating competency is the applicable certificate. In addition, the SDT has modified the Measure M1.3 to provide clarification. The Measure M1.3 now reads "A copy of each of its System Operator's NERC certificate or NERC certificate number with expiration date which demonstrates compliance with the applicable Areas of Competency".</p>				
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.
Anthony Jankowski	Wisconsin Energy Corp.	4		
Linda Horn	Wisconsin Electric Power Co.	5		
<p><b>Response:</b> The SDT thanks you for your affirmative response and clarifying comment. The standard has only one measure that is covered by the Data Retention section.</p>				
Dennis Sismaet	Seattle City Light	6	Affirmative	Appropriate to change the language to indicate NERC certification as the requirement.
<p><b>Response:</b> The SDT thanks you for your affirmative response and clarifying comment.</p>				

Voter	Entity	Segment	Vote	Comment
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.
<p><b>Response:</b> FERC Order 693 contains a directive to modify the PER-003 standard to include minimum competencies. The SDT believes that the “Areas of Competency” as used in the proposed standard represents the most efficient and effective method of meeting this FERC directive. The drafting team believes that the NERC Certification program provides the foundation for the minimum competency that a person must possess to operate the Bulk Electric System reliably. The “Areas of Competency” identified in this standard are, by design, at a high enough level to ensure they will be included in any exam the NERC Certification Program would use both now and in the future. In addition, recertification through training would also touch upon one or more of these areas ensuring that anyone maintaining a valid NERC Certification has enhanced their ability to operate the Bulk Electric System.</p>				
Danny McDaniel	Cleco Power LLC	1	Affirmative	None
Michelle A Corley	Cleco Corporation	3	Affirmative	None
Stephanie Huffman	Cleco Power	5	Affirmative	None
Robert Hirschak	Cleco Power LLC	6	Affirmative	None