

Comment Report

Project Name: 2016-EPR-01 Enhanced Periodic Review of PER Standards | Templates for PER-003-1 and PER-004-2
Comment Period Start Date: 1/10/2017
Comment Period End Date: 2/23/2017
Associated Ballots:

There were 28 sets of responses, including comments from approximately 86 different people from approximately 63 companies representing 10 of the Industry Segments as shown in the table on the following pages.

Questions

1. The PER PRT recommends that a clarifying footnote be added to PER-003-1 to ensure that stakeholders (now and in the future) understand (i) the connection between the Standard and the NERC System Operator Certification Program Manual; and (ii) that the certifications referenced under PER-003-1 are those under the NERC System Operator Certification Program. Do you agree with the recommendation? If not, please explain in the comment area below.

2. The PER PRT recommends that PER-004-2 be retired. The PER PRT believes that the requirements in PER-004-2 are duplicative with several other standards as outlined in the PER-004-2 EPR template. Do you agree with the recommendation? If not, please explain in the comment area below.

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
ACES Power Marketing	Brian Van Gheem	6	NA - Not Applicable	ACES Standards Collaborators	Mark Peter	Hoosier Energy Rural Electric Cooperative, Inc.	1	RF
					Shari Heino	Brazos Electric Power Cooperative, Inc.	1,5	Texas RE
					Tara Lightner	Sunflower Electric Power Corporation	1	SPP RE
					John Shaver	Arizona Electric Power Cooperative, Inc.	1	WECC
					Ryan Strom	Buckeye Power, Inc.	4	RF
					Greg Froehling	Rayburn Country Electric Cooperative, Inc.	3	SPP RE
					Amber Skillern	East Kentucky Power Cooperative	1,3	SERC
					Amber Skillern	East Kentucky Power Cooperative	1,3	SERC
Duke Energy	Colby Bellville	1,3,5,6	FRCC,RF,SERC	Duke Energy	Doug Hills	Duke Energy	1	RF
					Lee Schuster	Duke Energy	3	FRCC
					Dale Goodwine	Duke Energy	5	SERC
					Greg Cecil	Duke Energy	6	RF
Southern Company - Southern Company Services, Inc.	Marsha Morgan	1,3,5,6	SERC	Southern Company	Katherine Prewitt	Southern Company Services, Inc	1	SERC
					Jennifer Sykes	Southern Company Generation and Energy Marketing	6	SERC

					R Scott Moore	Alabama Power Company	3	SERC
					William Shultz	Southern Company Generation	5	SERC
California ISO	Richard Vine	2		ISO/RTO Council Standards Review Committee	Ali Miremadi	California ISO	2	WECC
					Greg Campoli	NYISO	2	NPCC
					Kathleen Goodman	ISONE	2	NPCC
					Liz Axson	ERCOT	2	Texas RE
					Terry Bilke	MISO	2	MRO
					Ben Li	IESO	2	NPCC
					Mark Holman	PJM	2	RF
					Charles Yeung	SPP	2	SPP RE
Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	RSC no Dominion and Eversource	Paul Malozewski	Hydro One.	1	NPCC
					Guy Zito	Northeast Power Coordinating Council	NA - Not Applicable	NPCC
					Randy MacDonald	New Brunswick Power	2	NPCC
					Wayne Sipperly	New York Power Authority	4	NPCC
					Glen Smith	Entergy Services	4	NPCC
					Brian Robinson	Utility Services	5	NPCC
					Bruce Metruck	New York Power Authority	6	NPCC
					Alan Adamson	New York State Reliability Council	7	NPCC
					Edward Bedder	Orange & Rockland Utilities	1	NPCC
					David Burke	UI	3	NPCC
					Michele Tondalo	UI	1	NPCC

					Sylvain Clermont	Hydro Quebec	1	NPCC
					Si Truc Phan	Hydro Quebec	2	NPCC
					Helen Lainis	IESO	2	NPCC
					Laura Mcleod	NB Power	1	NPCC
					Michael Forte	Con Edison	1	NPCC
					Kelly Silver	Con Edison	3	NPCC
					Peter Yost	Con Edison	4	NPCC
					Brian O'Boyle	Con Edison	5	NPCC
					Greg Campoli	NY-ISO	2	NPCC
					Kathleen Goodman	ISO-NE	2	NPCC
					Silvia Parada Mitchell	NextEra Energy, LLC	4	NPCC
					Michael Schiavone	National Grid	1	NPCC
					Michael Jones	National Grid	3	NPCC
					David Ramkalawan	Ontario Power Generation Inc.	5	NPCC
Southwest Power Pool, Inc. (RTO)	Shannon Mickens	2	SPP RE	SPP Standards Review Group	Shannon Mickens	Southwest Power Pool Inc.	2	SPP RE
					Kevin Giles	Westar Energy	1	SPP RE
					Lonnie Lindekugel	Southwest Power Pool Inc.	2	SPP RE
					Mike Kidwell	Empire District Electric Company	1,3,5	SPP RE
					Jim Nail	City of Independence, Power and Light Department	5	SPP RE
Santee Cooper	Shawn Abrams	1,3,5,6		Santee Cooper	Tom Abrams	Santee Cooper	1	SERC
					Rene' Free	Santee Cooper	1	SERC
					Diana Scott	Santee Cooper	1	SERC

					Heugnette Bostic Santee Cooper	1	SERC
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1. The PER PRT recommends that a clarifying footnote be added to PER-003-1 to ensure that stakeholders (now and in the future) understand (i) the connection between the Standard and the NERC System Operator Certification Program Manual; and (ii) that the certifications referenced under PER-003-1 are those under the NERC System Operator Certification Program. Do you agree with the recommendation? If not, please explain in the comment area below.

LeRoy Patterson - Public Utility District No. 2 of Grant County, Washington - 1,4,5,6

Answer No

Document Name

Comment

This recommendation may be suitable if the standard was being revised for a substantive reason, but to make a change to the standard to implement this recommendation is unwarranted. The footnote is unnecessary for any RC, TOP, and/or BA stakeholder worthy of performing functions to which this standard applies.

The purpose statement in PER-003-1 specifically states the standard is "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."

In addition, requirement 1 specifically references a "...valid NERC Reliability Operator certificate...", while requirements 2 and 3 specifically references "...obtaining and maintaining one of the following valid NERC certificates..." and specifically lists applicable NERC certifications for each requirement.

Further, the PER-003 RSAW has auditor guidance that the "...Audit Team may contact NERC to confirm the certification information is valid." This guidance points to the NERC System Operator Certification Program and associated manual. It would require a tortured argument to point these references to certifications or a certification program other than NERC.

Considering the above references, coupled with historic precedent from previous audits, there should be no need to include a footnote to ensure BAs, TOPs, and RCs "understand (i) the connection between the Standard and the NERC System Operator Certification Program Manual; and (ii) that the certifications referenced under PER-003-1 are those under the NERC System Operator Certification Program."

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 3,5

Answer No

Document Name

Comment

AEP believes the standard is sufficiently clear in this regard as currently written. The current version of these requirements all specify NERC certificates, so a direct correlation to the NERC System Operator Certification Program Manual should already be clear. While AEP does not entirely

object to the concept of explicitly referencing the SOC Program Manual in PER-003-1, care should be taken to ensure that additional obligations aren't unintentionally implied (say, from the content of the manual itself) by doing so.

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion and Eversource

Answer

No

Document Name

Comment

While we do not feel strongly one way or the other with the proposed addition of a clarifying footnote, we are unclear on where that footnote will be added, i.e., is it under R1, R2 or R3 or all of the above. We wonder if a seemingly minor change would provide sufficient reliability improvement to warrant the effort needed to effect the change (e.g., forming a drafting team, going through the approval process, etc.). Also, the PER-003-1 EPR template indicates sub-parts (a) to (g), which are not found in the PER-003 standard. This needs to be clarified in the SAR.

There is already a footnote related to each requirement R1, R2 and R3 in PER-003-1 which ties to the NERC Operator Certification Program.

FN1 of PER-003-1 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.

Likes 0

Dislikes 0

Response

Richard Vine - California ISO - 2, Group Name ISO/RTO Council Standards Review Committee

Answer

No

Document Name

Comment

For PER-003-1, it is unclear as to where this footnote will be added, i.e., is it under R1, R2 or R3, or all of the above. This needs to be clarified but the SRC questions whether it is worth the effort in creating a SAR given that there is significant effort involved in creating a SAR, forming a drafting team and processing the proposed changes through the NERC and FERC regulatory processes. SRC is of the opinion that the proposed footnote addition does not provide enough of a justification for the amount of effort needed for the industry to put out a SAR, form a drafting team, recommend changes and get the proposed changes through the NERC and regulatory process.

Likes 0

Dislikes 0

Response

Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

BPA has no objections to this proposed edit for clarification.

Likes 0

Dislikes 0

Response

Oliver Burke - Entergy - Entergy Services, Inc. - 1,5

Answer Yes

Document Name

Comment

Entergy Agrees with adding a footnote to PER-003-1 Standard.

Likes 0

Dislikes 0

Response

Quintin Lee - Eversource Energy - 1,3,5

Answer Yes

Document Name

Comment

We don't think this has been an issue in the past, however we do not object to the clarifying footnote being added.

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer Yes

Document Name

Comment

The suggested clarification to highlight that certifications required under PER-003-1 must be NERC certifications appears reasonable, particularly in light of the proposed retirement of PER-004-2.

Likes 0

Dislikes 0

Response

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group

Answer Yes

Document Name

Comment

The SPP Standards Review Group agrees with the Periodic Review Team's (PRT) recommendation for adding a footnote to provide more clarity in the Standard. Additionally, we suggest the drafting team add a Guideline and Technical Basis (GTB) Section to the Standard to help provide clarity in reference to the Requirements. Also, we suggest reformatting the Measurements in the current Standard. We feel this will help provide consistency with the current formatting of newly developed and revised Standards in reference to the Requirement and Measurement Process. The best example of the current formatting process would be demonstrated in the IRO-002-4 Standard.

Likes 0

Dislikes 0

Response

Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable, Group Name ACES Standards Collaborators

Answer Yes

Document Name NERC 2012 Exam Study Guide.pdf

Comment

(1) We agree that a footnote should be added to NERC Reliability Standard PER-003-1 that clarifies its dependency on the NERC System Operator Certification Program. However, we feel the Periodic Review Team (PRT) has neglected to address an urgent compliance gap present following recent changes to the NERC System Operator Certification Program, and urge the PRT to revise its recommendation to identify that a revision to the standard is necessary.

(2) We observe no complementary mechanism that ties the NERC System Operator Certification Program back to this reliability standard. At a minimum, we expect direct, one-for-one alignment between the areas of competencies and the content domains identified as the framework used to ensure the content validity of each NERC certification exam. From what we observe, these content domains were updated recently in the 2017 NERC Exam Resource Materials posted on the NERC web site (<http://www.nerc.com/pa/Train/SysOpCert/Pages/default.aspx>). For comparison, we attached a similar list of content domains from 2012. Without this alignment and when the requirements within this standard are taken verbatim, then industry is burdened to demonstrate that a minimum competency has been obtained for applicable staff performing Real-time, company-specific, reliability-related tasks.

(3) The current approach to the interdependencies between this reliability standard and the NERC Continuing Education Program relies on the assumption that all registered entities are also NERC Continuing Education Providers. We find this is not always the case. We believe the minimum set of competencies System Operators must maintain are already addressed by the systematic training approach required by their employers in NERC Reliability Standard PER-005-2. At a minimum, we ask the PRT to document in its recommendations that further coordination with the NERC Personnel Certification Governance Committee is necessary to update the list of Recognized Operator Training Topics, as identified in Appendix A of the NERC System Operator Certification Program Manual. We feel this list needs to be revised with current industry concerns, situation awareness and human performance-centric themes, and available technologies.

(4) We ask the PRT to expand its recommendation to include a footnote reference to the NERC Personnel Certification Governance Committee (PCGC) and the importance of its role in monitoring the performance of the NERC System Operator Certification Program.

Likes 0

Dislikes 0

Response

John Williams - Tallahassee Electric (City of Tallahassee, FL) - 1,3,5

Answer Yes

Document Name

Comment

Likes 1

Tallahassee Electric (City of Tallahassee, FL), 5, Webb Karen

Dislikes 0

Response

Karen Webb - Tallahassee Electric (City of Tallahassee, FL) - 1,3,5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Daniel Herring - DTE Energy - Detroit Edison Company - 3,4,5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Karie Barczak - DTE Energy - Detroit Edison Company - 3,4,5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jeffrey DePriest - DTE Energy - Detroit Edison Company - 3,4,5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Rick Applegate - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response**Glen Farmer - Avista - Avista Corporation - 1,3,5****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Shawn Abrams - Santee Cooper - 1,3,5,6, Group Name Santee Cooper****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Preston Walker - PJM Interconnection, L.L.C. - 2 - SERC,RF****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response

Michelle Amarantos - APS - Arizona Public Service Co. - 1,3,5,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Douglas Webb - Great Plains Energy - Kansas City Power and Light Co. - 1,3,5,6 - SPP RE

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Lauren Price - American Transmission Company, LLC - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Sean Bodkin - Dominion - Dominion Resources, Inc. - 3,5,6

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Laura Nelson - IDACORP - Idaho Power Company - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

sean erickson - Western Area Power Administration - 1,6**Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

Response**Scott Downey - Peak Reliability - 1****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

Response

2. The PER PRT recommends that PER-004-2 be retired. The PER PRT believes that the requirements in PER-004-2 are duplicative with several other standards as outlined in the PER-004-2 EPR template. Do you agree with the recommendation? If not, please explain in the comment area below.

Scott Downey - Peak Reliability - 1

Answer No

Document Name

Comment

Peak respectfully disagrees with the recommendation that PER-004-2 be retired. PER-004-2 R1 states that each Reliability Coordinator shall be staffed 24 hours per day, seven days per week. This requirement is not adequately captured in other standards outlined in the PER-004-2 EPR template. Peak suggests consideration be given to incorporating the 24x7 staffing language into PER-003-1 R1.

Likes 0

Dislikes 0

Response

Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable, Group Name ACES Standards Collaborators

Answer Yes

Document Name

Comment

Thank you for the opportunity to comment.

Likes 0

Dislikes 0

Response

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group

Answer Yes

Document Name

Comment

We truly appreciate the efforts of the Periodic Review Team (PRT) on identifying the Paragraph 81 Criteria associated with this particular Standard. The SPP Standards Review Group is in agreeance with the recommendation of retirement of this Standard.

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer Yes

Document Name

Comment

Both PER-004-2 requirements do appear to be substantially addressed by other reliability requirements.

Likes 0

Dislikes 0

Response

Quintin Lee - Eversource Energy - 1,3,5

Answer Yes

Document Name

Comment

We agree that the requirements of PER-004-2 are duplicative and that it can be retired

Likes 0

Dislikes 0

Response

Oliver Burke - Entergy - Entergy Services, Inc. - 1,5

Answer Yes

Document Name

Comment

Entergy agrees on the retirement of the PER-004 Standard.

Likes 0

Dislikes 0

Response

LeRoy Patterson - Public Utility District No. 2 of Grant County, Washington - 1,4,5,6

Answer Yes

Document Name

Comment

However, this organization is not a Reliability Coordinator so PER-004 does not apply to us.

Likes 0

Dislikes 0

Response

Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC

Answer Yes

Document Name

Comment

BPA believes that this Standard is for Reliability Coordinators and does not apply to BPA, therefore BPA has no objections to this proposed recommendation.

Likes 0

Dislikes 0

Response

Richard Vine - California ISO - 2, Group Name ISO/RTO Council Standards Review Committee

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion and Eversource

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
sean erickson - Western Area Power Administration - 1,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Laura Nelson - IDACORP - Idaho Power Company - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

Sean Bodkin - Dominion - Dominion Resources, Inc. - 3,5,6

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Lauren Price - American Transmission Company, LLC - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Douglas Webb - Great Plains Energy - Kansas City Power and Light Co. - 1,3,5,6 - SPP RE

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer

Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Preston Walker - PJM Interconnection, L.L.C. - 2 - SERC,RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Shawn Abrams - Santee Cooper - 1,3,5,6, Group Name Santee Cooper	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Glen Farmer - Avista - Avista Corporation - 1,3,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

Rick Applegate - Tacoma Public Utilities (Tacoma, WA) - 1,3,4,5,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jeffrey DePriest - DTE Energy - Detroit Edison Company - 3,4,5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Karie Barczak - DTE Energy - Detroit Edison Company - 3,4,5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Daniel Herring - DTE Energy - Detroit Edison Company - 3,4,5

Answer Yes

Document Name

Comment	
Likes 0	
Dislikes 0	
Response	
Karen Webb - Tallahassee Electric (City of Tallahassee, FL) - 1,3,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
John Williams - Tallahassee Electric (City of Tallahassee, FL) - 1,3,5	
Answer	Yes
Document Name	
Comment	
Likes 1	Tallahassee Electric (City of Tallahassee, FL), 5, Webb Karen
Dislikes 0	
Response	