Unofficial Comment Form

Project 2016-EPR-01 Enhanced Periodic Review of Personnel Performance, Training, and Qualifications Standards (PER)

Do not use this form for submitting comments. Use the electronic form to submit comments on the Project 2016-EPR-01 PER project. The electronic form must be submitted by 8 p.m. Eastern, Thursday, February 23, 2017.

Documents and information about this project are available on the Project 2016-EPR-01 PER page. If you have questions, contact Senior Standards Developer, Darrel Richardson (via email) or at (609) 613-1848.

Background

This periodic review project will review the following three PER standards:

- PER-001-0.2 – Operating Personnel Responsibility and Authority;
- PER-003-1 – Operating Personnel Credentials; and
- PER-004-2 – Reliability Coordination – Staffing.

The PER periodic review team (PER PRT) will use the background information, along with any associated worksheets or reference documents (such as the Independent Expert Review Project report, and Paragraph 81 criteria) to guide a comprehensive review that results in a recommendation from one of the following three choices:

1. Recommend re-affirming the standard;
2. Recommend revising the standard; or
3. Recommend retirement of the standard.

If the PER PRT recommends a revision to, or a retirement of, the standard, it must also submit a Standard Authorization Request to the Standards Committee outlining the proposed scope and technical justification for the revision or retirement.

PER-001-0.2 was initially included in this project. However, the standard was subsequently approved for retirement under FERC Order 817. Therefore this project will only review PER-003-1 and PER-004-2.
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.

☐ Yes
☒ No

Comments:

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.

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.

☒ Yes
☐ No

Comments: