Unofficial Comment Form
Project 2010-01 Training (PER) Revisions

Please DO NOT use this form for submitting comments. Please use the electronic form to submit comments on the draft PER-005-2 standard. The electronic comment form must be completed by 8:00 p.m. ET on Friday, January 17, 2014.

If you have questions please contact Jordan Mallory via email or by telephone at 404-446-9733.

The project page may be accessed by clicking here.

Background Information
On March 16, 2007 the Federal Energy Regulatory Commission (FERC) issued Order No. 693, Mandatory Reliability Standards for the Bulk-Power System and on November 18, 2010 FERC issued Order No. 742, System Personnel Training Reliability Standards. Five outstanding directives remain from those two orders (3 from Order No. 693 and 2 from Order No. 742), which are explained in detail in the PER White Paper contained in the SAR package.

The informal consensus building for PER began in February 2013. Specifically, the ad hoc group engaged stakeholders on how best to address the FERC directives, paragraph 81 candidates and results-based approaches (see page 4 of the PER White Paper regarding the paragraph 81 candidate). A discussion of the ad hoc group’s consensus building and collaborative activities are included in the PER White Paper (see SAR package).

Based on stakeholder outreach, the PER ad hoc group has developed one revised proposed reliability standards (PER-005-2) that address the FERC directives and recommendations for improving PER-005-1, which included creating results-based requirements and considering paragraph 81 criteria to ensure that the standards proposals did not include requirements that meet those criteria. A discussion of the ad hoc group’s consensus building and collaborative activities are included in the technical white paper.

This posting is soliciting comment on a pro forma standard and a Standard Authorization Request (SAR).

You do not have to answer all questions. Enter comments in simple text format. Bullets, numbers, and special formatting will not be retained.
Question

1. The drafting team has revised PER-005-2 in response to stakeholder comments. Do you agree with the revised Operations Support Personnel and System Operator definitions? If you do not agree or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments.

☐ Yes
☒ No

Comments: The proposed System Operator definition could apply to a segment of Operators that, while located in a Control Center, only operate BES elements at the direction of NERC Certified operators. The term ‘operate’ is too broad and may unnecessarily include personnel who do not perform the System Operator function. A System Operator is responsible for the Reliable Operation of the BES, and performs this function by controlling or directing the operation of the BES in Real-time.

The currently proposed definition would expand the applicability of Requirement 1 to Operators that are not responsible for independently performing real time reliability tasks. These Operators only perform switching of BES elements at the direction of certified Operators. In order to eliminate this unintended applicability, consider that the word “independently” be inserted immediately prior to the word “operates” in the System Operator definition. The definition would then become:

“An individual at a Control Center of a Balancing Authority, Transmission Operator, or Reliability Coordinator, who independently operates, or directs, the operation of the Bulk Electric System in Real-time.”

The Drafting Team must consider how emergencies are handled. For example, if there is a situation in the field that involves the safety of the public or industry personnel, there are entities that allow field personnel to do emergency switching. By the definition they would be considered System Operators.
2. The drafting team has revised PER-005-2 in response to stakeholder comments. Do you agree with the revised standard? If you do not agree or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments.

☐ Yes
☒ No

Comments: The term ‘operate’ is too broad. In Order No. 742 at P62, FERC clarified its understanding that local control center personnel “exercise control over a significant portion of the Bulk-Power System under the supervision of the personnel of the registered transmission operator.” This draft was to address the local transmission owners, however the SDT chose to use the term ‘operate,’ whereas Order 742 used ‘control.’ This term should be added to the NERC Glossary.

Suggest rewording the Applicability as follows to be in accordance with the FERC understanding:

4.1.4 Transmission Owner that has:
   4.1.4.1 Personnel, excluding field switching personnel, who can act independently to control or direct the operation of the Transmission Owner’s Bulk Electric System Transmission facilities in Real-time

Suggest deleting Requirement R5. EMS personnel have been excluded because the data does not support their inclusion. From page 4 of the White Paper (July 15, 2013):

“The argument for not including EMS personnel in the training standard at this time is based on a report provided by the Event Analysis Subcommittee (EAS). The EAS worked with the NERC Event Analysis (EA) staff to review the events that have been cause-coded since October 2010. The database has over 263 events; … [and] only two were deemed to be a training issue. Therefore, based on the information, the EAS and PER ad hoc group do not believe it is necessary at this time to require EMS support personnel to receive the level of training required of a BA, Reliability Coordinator (RC), and TOP by NERC standard PER-005.”

A data analysis would show that Operations Support Personnel should be excluded as well. If only two (of the 263 events) were deemed to be a training issue, then how can there be a reliability gap with the training of Operation Support Personnel?

If it is decided to keep Requirement R5, suggest using the appropriate language to make it conform with the preceding.
The applicability to Transmission Owner should be removed from the standard. This sets a precedent of applying “operator” requirements to entities that are “owners.” This could expand applicability for TOs into additional standards, such as those dealing with issuing Operating Instructions, or owning and operating Control Centers. As outlined by FERC directive in Order 742, these TOs are either following predefined procedures or specific directions from a TOP and should not be considered to have independent operation, control or authority of the BES and should not have applicability to standards related to the operation of the BES.

If the Transmission Owner applicability remains, “facility” in 4.1.4.1 should be capitalized. The applicability to Transmission Owners is only to their “Bulk Electric System transmission facilities” and the definition of Facility is “[a] set of electrical equipment that operates as a single Bulk Electric System Element.” Since both the definition of Facility and the applicability are limited to the BES they are synonymous and not capitalizing the term only adds confusion.

If the applicability to Transmission Owner is retained, recommend removing Transmission Owners from R4 which requires entities who control facilities with IROLs to use simulation technology during emergency operations training. In Order 693, FERC directed NERC to require Reliability Coordinators, Transmission Operators, and Balancing Authorities to use simulation technology during emergency operations training. The requirement to use simulation technology does not make sense for Transmission Owners who do not have a wide area view of the BES and do not determine actions necessary to relieve IROLs. Transmission Owners should not be required to use simulation technology during emergency operations training because, like Generator Operators, they will receive operational instructions from Transmission Operators, Balancing Authorities or Reliability Coordinators during emergencies.

The Applicability section for Generator Operator, Section 4.1.5.1 should use the term “Control Center” as the NERC definition of Control Center, “One or more facilities hosting operating personnel that monitor and control the Bulk Electric System (BES) in real-time to perform the reliability tasks, including their associated data centers, of... 4) a Generator Operator for generation Facilities at two or more locations” is consistent with the idea of a “centrally located dispatch center” as outlined in the applicability section.

The requirement for Transmission Owners to develop a training program using the systematic approach to training in R2 will result in training that is better tailored to individual Transmission Owner BES reliability related tasks.

There is a disconnect between PER-005-2 and the draft COM-002-4 Applicability. The COM-002-4 draft is applicable to DP’s while PER-005-2 is applicable to the TO local control center personnel. It is incongruous that the COM standard expects these operating instructions to go to DP but PER-005 expects them to go to TO’s.

What is the measure of “independently” in Applicability 4.1.4.1. “Independently” of what?
Extend the second HIGH VSL condition for R6 by adding “to develop and implement training for its personnel” after “systematic approach” to conform with the language used in R6.