Unofficial Comment Form
Project 2010-01 Training
PER-005-1 (Operations Personnel Training)

Please DO NOT use this form for submitting comments. Please use the electronic form to submit comments on the Standard. The electronic comment form must be completed by 8:00 p.m. ET Monday, November 11, 2013.

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

The project page may be accessed by clicking here.

Background Information
The Project 2010-01 Training Standard Drafting Team posted an initial draft of the Standard PER-005-2 (Operations Personnel Training) for comment from July 19 to September 3, 2013. The drafting team has revised the standard based on stakeholder recommendations that the drafting team considered appropriate. Changes made to the PER-005-2 standard are redlined and can be accessed by clicking here.

This posting solicits comment on the revised PER-005-2 standard. The standard responds to FERC Order No. 693 and No. 742.

Questions on PER-005-2

1. The drafting team has revised PER-005-2 in response to stakeholder comments. Do you agree with the revised 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: Suggest revising the proposed definition of System Operator to:

System Operator: An individual at a control center of a Balancing Authority, Transmission Operator, or Reliability Coordinator, who monitors and controls the operation of the Bulk Electric System in Real-time.
Without more explicit wording, personnel at locations other than an “individual at a control center” who are not system operators may be included under that definition. Distribution related field, substation and satellite location personnel should not be classified as System Operators by an overly broad definition. A System Operator performs two critical functions: monitoring and control (of the status of Bulk Electric System assets). Anyone who does not perform these functions must rely on a System Operator to perform them, and is not operating independently. They are not 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 Applicability section of the standard related to Transmission Owners and Generator Operators requires clarification.

In the Applicability section, for the Transmission Owner the list of tasks in 4.1.4.1 do not “define” the applicable Transmission Owner personnel. The protection of Transmission Owner assets and personnel safety should be outside the reach of NERC standards.

Propose the following revision to the wording in the Applicability Section 4.1.4:

4.1.4 Transmission Owner that has:

4.1.4.1. Personnel at a facility that acts as a centralized Control Center for the Transmission Owner who interact with their Reliability Coordinator, Balancing Authority or Transmission Operator. Field switching personnel or other personnel who do not act independently of this centralized Transmission Owner Control Center are exempt.

The definitions should not be specific to this standard. They should be included in the NERC Glossary of Terms Used in Reliability Standards. The rigid definitions create confusion as to their application within each entity. It is very difficult to identify which position a requirement would apply to within a specific organization. Suggest that each entity define the applicability of PER-005-2 within its own organization; for example, any position that has a task that has an impact on the operations of the main transmission system.

Pertaining to Section 4.1.5 Generator Operator, suggest changing “may” to “has the authority”. It is possible that the GOP may receive specific dispatch instructions in some instances, but in other instances
be allowed the flexibility to develop dispatch instructions based on RC, BA or TOP guidance. Additionally, “plant operators” needs to clarify that it only applies to dispatch instructions for BES generators, and does not include dispatch instructions for non-BES generation plant operators.

From Section 4.1.5, “Dispatch personnel at a centrally located dispatch center who receive direction from their Reliability Coordinator, Balancing Authority, Transmission Operator, or Transmission Owner and has the authority to develop specific dispatch instructions for BES generator plant operators under their control.” This use of “personnel” does not include plant operators located at a generator plant site or personnel at a centrally located dispatch center who relay dispatch instructions, without making any modifications.

Remove footnotes 2 and 3 as they are unnecessary. Repetition of Standard Only Glossary Terms in the footnotes in not necessary.

In Part 1.1, the additional phrase “based on a defined and documented methodology” is of concern. The training program for the responsible entity needs to be based on “the list of Bulk Electric System (BES) company specific Real-time reliability-related tasks”. Part 1.1 thus should end at the word “tasks”. Adding the phrase “based on defined and documented methodology” does not add any value to the requirement, but creates an uncertainty as to “who defines the methodology” and with what criteria is the methodology defined. In the SDT’s Summary Consideration report, there is no mention of any comment made to this part in the previous posting, thus providing no basis for this addition. We suggest removing this phrase from Part 1.1.

Requirement R2 requires that each RC, BA, TOP, and TO shall verify, at least once, the capabilities of its System Personnel. The Implementation Plan states that entities that were not previously subject to PER-005-1 must have verified its System Personnel’s capabilities to perform each of its assigned Real-time reliability-related tasks, at least once, as identified in Requirement R1 part 1.1, prior to the effective date of the standard. Requiring entities to perform certain activities prior to the effective date of the standard means in practice advancing its effective date, which is not possible in certain jurisdictions where requirements cannot be legally enforceable prior to the standard's effective date. An entity meeting the requirement before the effective date may constitute good practice but an entity cannot be held non-compliant for not doing it. Suggest changing to: Entities that were not previously subject to PER-005-1 must have verified its System Personnel’s capabilities to perform each of its assigned Real-time reliability-related tasks, at least once, as identified in Requirement R1 part 1.1, within one year of the standard becoming in force within their respective jurisdiction. The suggested 1 year could be reduced to 6 months if felt appropriate.

Regarding R5, these personnel do not need to be trained on the “impact of their job function(s) as it pertains to reliable operations of the BES during normal and emergency operations.” The intent is to
train these personnel “on their job function(s) as it (they) pertain(s) to...”. Also regarding Requirement R5, the words “to training” are missing after “systematic approach”. The training in R5 is required regardless of the personnel’s capability since there is no requirement to assess the capabilities of the personnel for the identified tasks. Suggest adding language to allow for a demonstration of capabilities on the required tasks similar to R2. Additionally, a grace period similar to R2.1 should be added to R5 to allow time between a change in the training program to the time training is required to be completed.

Requirement R4 should be deleted in its entirety. From page 4 of the White Paper:

“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.”

Requirements R1, R4 and R5 stipulate the use of systematic approach to training to develop and implement training or training program (note the inconsistent wording among them) for their respective group of personnel. While R4 and R5 contain a HIGH VSL for failing to use systematic approach to training to develop and implement the training program, R1 does not have a similar VSL. Suggest adding a HIGH VSL to R1 to address this.

From the Compliance Input document:

“Question 2: In Requirement R3, does an entity that has one or more IROLs have 12 months to conduct simulation technology training when it obtains another IROL?

Compliance Response to Question 2: No, if an entity currently has one or more IROLs, it has the ability to conduct simulation technology. The 12 months applies only to an Entity that did not have any IROLs but obtains an IROL for the first time.”

Please clarify that the training is in general response to IROLs and not specific to each individual IROL.
Also from the Compliance Input document:

“Following final approval of the Reliability Standard, Compliance will develop the final Reliability Standards Auditor Worksheet (RSAW) and associated training. Attachment A represents the version of the proposed standard requirements referenced in this document.”

This is inconsistent with both the SPM From Section 3.6 of the SPM:

“Collectively, each drafting team:
• Drafts proposed language for the Reliability Standards, definitions, Variances, and/or Interpretations and associated implementation plans.
• Develops and refines technical documents that aid in the understanding of Reliability Standards.
• Works collaboratively with NERC Compliance Monitoring and Enforcement Staff to develop Reliability Standard Audit Worksheets (“RSAWs”) at the same time Reliability Standards are developed.
• etc...”