Unofficial Comment Form
Project 2010-01 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 Tuesday, September 3, 2013.

If you have questions please contact Jordan Mallory via email or by telephone at 404-446-29733.

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. Do you have any specific questions or comments relating to the scope of the proposed standard action or any component of the SAR outside of the pro forma standard?

☐ Yes
☐ No

Comments: The SAR should not be posted with the Standard. The intent of posting a SAR for comment is to seek industry’s input on the need and scope of a proposed standard’s development or revision. Posting the Standard for comments and ballot means that the SAR is “water under the bridge”, and that industry’s input on SAR doesn’t mean anything.

In the proposed Purpose of the Standard the words “performing or” should be deleted. A more results oriented Purpose statement would read as follows: To ensure that personnel supporting Real-time reliability tasks are trained and competent.

2. Please specify if you have comments or proposed changes to any of the Requirements of the pro forma standard.

Comments: What is the basis for assigning a Long-Term Planning Time Horizon to the five requirements of a Standard that addresses training for operating personnel and support personnel? As suggested by a number of Requirements in the Standard, training is delivered at least annually, if not more frequently, and the training program needs to be reviewed and revised once a year. This is much shorter than the Long-term Planning time frame. The intent of the Time Horizon is to indicate the general time frame to correct a non-compliance with a requirement. We do not see how a non-compliance of any of the requirements should wait for more than a year to mitigate, in view of the time frame stipulated in the Requirements. We suggest to change the Time Horizons to Operations Planning.

Control Center should be capitalized throughout the Standard.

Regarding the Standard’s Introduction--

In 4.1.4.1 what is the intention of the use of the word “operate”? Does operate mean giving or executing instructions? 4.1.4.1 reads “Personnel in a transmission control center who operate a portion of the Bulk Electric System at the direction of its Transmission Operator.” Propose changing the second occurrence of the word “a” to “any”.

4.1.5.1 is ambiguous. What is a centrally located dispatch center? It is not defined.
Suggest repeating 4.1.5.1.1 section for Transmission Owner 4.1.4.1. Make a “4.1.4.2 Personnel in a centrally located dispatch center who relay instructions without making any modifications, are excluded”.

4.1.5.1.1--“...who relay dispatch instructions,...” is not clear. What is the “relay” intended to convey? Consider changing “relay” to “communicate” if that better explains the intent.

Regarding Requirement R1--

Regarding R1 part 1.4, specify that the delay for completing the annual program evaluation should be done once the calendar year is over. For example, to evaluate the 2013 training program, wait until the end of the year on December 31, 2013, and then, do the annual program evaluation.

R1 part 1.1--What in R1 is “BES company specific”? Is BES a modifier of the word “company” or a modifier of the word “tasks” in this sentence? The Requirement is ambiguous.

R1 part 1.1.1--This requirement is inconsistent with the prior one as to the use of the word “tasks”. It should repeat “Real-time reliability-related tasks” in the task update obligation to be consistent with R1.1.

R1 part 1.3--Is this one time training? If not, where is the refreshing interval specified? Can the person perform their job before they receive this training?

Regarding Requirement R2--

R2--Does the verification of System personnel capabilities apply to each task in the SAT? Is the proposed standard designing and specifying the personnel testing here? Should it be?

Regarding Requirement R3--

R3--“Emergency” can be removed.

R3 part 3.1--Focusing on the words “gains operational authority”, no RC, BA, TOP or TO should gain operational authority until after all its staff are trained.

Regarding Requirement R4--

Requirement R4 is unclear regarding Real-time reliability-related tasks.
The proposed definition of Support Personnel is: Individuals who carry out outage coordination and assessments, or determine SOLs, IROLs or operating nomograms for Real-time operations. This definition clearly indicates that these personnel do not perform any Real-time tasks, although their tasks produce results that are applied in Real-time operations.

R4 stipulates that: Each Reliability Coordinator, Balancing Authority, Transmission Operator, and Transmission Owner shall establish and implement training for Support Personnel specific to those Real-time reliability-related tasks identified by the entity pursuant to Requirement R1 part 1.1 and part 1.1.1 that relate to the Support Personnel’s job function.

Should Support Personnel be trained for Real-time tasks? R4 references Requirement R1 parts 1.1 and 1.1.1 which specifically refer to “Real-time reliability-related tasks”. If R4 means tasks that are related to Real-time reliability, then outage coordination and assessment and determination of SOLs, IROLs, etc. will certainly meet such criteria and therefore the Support Personnel will need to be trained on the “related” Real-time task. The question then becomes who exactly are the Support Personnel that need to be trained? And trained in what? As written, Responsible Entities will not have a clear understanding of what their obligations are with respect to the who to train and the topics to be including in the training program for Support Staff.

We are unable to suggest any specific wording to clarify the definition for Support Personnel and/or Requirement R4 since we do not know what training objective the Standard Drafting Team intends for Support Personnel.

Requirement R5--

Regarding R5 and M5, the words “Systematic approach to training” should be replaced by “training” as it is written in R4. This is what is explained in the Rationale Box for R5.

It is not necessary to include “applicability section 4.1.5” in R5.

R5 part 5.1.1--The expectations and results desired from the RC, BA, TO and TOP are not clear. What constitutes input? Is a comment an input?

It is agreed that the GOP should receive input from its Reliability Coordinator (RC), Balancing Authority (BA) and Transmission Operator (TOP). A method that would be sufficient to accomplish that would be to have the RC, BA or TOP post its PRC-005-2 input for GOPs on its website and that the GOPs incorporate the input into their training. The TO should not have to provide input. Transmission Owners and
Generator Operators either have contractual, tariff or integrated relationships which forego the need for additional input, and, moreover, the operational Reliability Standards that drives the need for training under PRC-005-2 are relationships between BA, s TOPS, RCS and GOPs – not TOs and GOPs. Recommend that references to TOs be deleted from PER-005-2 R5 and its sub requirements.

A suggestion to be considered is to combine R5 and part 5.1 for better efficiency. The wording of R5 could be changed to:

Each GOP shall establish and implement training for its personnel which includes coordinating with its RC, BA, TOP, and TO to identify training topics that address the impact of the decision and actions of a GOP’s personnel as it pertains to the reliability of the BES during normal and emergency operations.

Part 5.1.1 should be made a separate Requirement because it stipulates requirements for entities other than the GOP. Suggested language for a new R6:

Each Reliability Coordinator, Balancing Authority, Transmission Operator, and Transmission Owner shall provide input to a Generator Operator’s training program established under R5 as requested by the Generator Operator.

It should be noted that at the bottom of page 19 of the White Paper, FERC’s response: “training for support personnel should be tailored to the functions they perform and need not be trained to the same extent as Transmission Operators.” Because training for personnel other than TOPs, RCs, and BAs need not be as comprehensive, we would suggest to delete the words “Transmission Owner” from R1, R2 and R3, and instead, create a new requirement for “Transmission Owner”, similar to R4.

3. Do you support the revised NERC Glossary Term System Operator? If no, please indicate in the comment section what suggested changes would put you in favor of the new glossary term.

☐ Yes
☒ No

Comments: The revised definition of "System Operator" potentially expands the applicable population subject to the Standard’s training requirements to beyond what was originally intended (e.g. the System Operator).
We agree that System Operators and personnel with that authority regardless of title issuing orders for changes in the state of BES Elements should be included in the definition. However, the proposed definitions lack clarity of scope. It is not clear which personnel at the Transmission Owner (TO) might be identified as System Operators. FERC Order 742 only identifies “local transmission control center operator personnel.” Yet, the definition is sufficiently broad and subject to interpretation that other personnel could, inadvertently, unintentionally and unnecessarily, also be swept into the definition including: (a) downstream personnel at substations or district offices who implement directives from “local transmission control center operator personnel,” but who do not initiate, monitor or control changes in the state of BES Elements, and/or (b) upstream personnel at headquarters and elsewhere who provide administrative supervision of “local transmission control center operator personnel,” but who do not directly monitor or control the state of BES Elements.

These individuals do not personally monitor or control changes in the state of BES Elements. Proposed Alternate Wording:

**System Operator**: An individual at a Control Center that monitors, directs and controls the operation of the Bulk Electric System (BES) in Real-time.

Per FERC’s directive, System Operators should both (1) be located at a “local transmission control center,” and (2) “exercise control” over changes in the state of BES Elements (see the Rationale for 4.1.4). Other personnel who either do not reside at the “local transmission control center” and/or do not “exercise control” over changes in the state of BES Elements are excluded.

Other concerns with the revision to the defined term “System Operator” to replace the current NERC Glossary term.

The revised System Operator definition incorporates the “Control Center” definition that is embodied in the CIP v5 filing in Docket No. RM13-5-000 and which is under consideration at this time by FERC:

“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: 1) a Reliability Coordinator, 2) a Balancing Authority, 3) a Transmission Operator for transmission Facilities at two or more locations, or 4) a Generator Operator for generation Facilities at two or more locations.”

In Paragraph 80 of its NOPR issued in the CIP v5 docket, FERC asked whether the phrase “generation Facilities at two or more locations” intended to include two or more units at one generation plant and/or two or more geographically dispersed units. Therefore, whether this definition will be remanded for further clarification is undetermined at this time.
In addition, when the term “System Operator” is used within PER-005-2, it is used in the “System Personnel” definition that is only used within PER-005-2 (i.e., it will not be a NERC Glossary term and will only be used within PER-005-2). Within the System Personnel definition, System Operators are limited to “System Operators of a Reliability Coordinator, Transmission Operator, or Balancing Authority.” Generator Operators, even those GOPs that are subject to the applicability of PER-005-2, are excluded.

While the existing System Operator definition uses the language “monitor and control,” that language is replaced with the phrase “operates or directs the operation” in the proposed new definition. Whether GOPs are intended to be included in the new System Operator definition has not been made clear.

The Standard begins by defining the terms System Operator, System Personnel and Support Personnel, but then applies for GOPs only the word “personnel.” It is not clear whether or not this differentiation was intentional, particularly since Applicability paragraph 4.1.5 appears to describe GOP dispatchers who are System Operators. It would seem that they should have been included in the System Personnel definition.

4. Do you support the revised PER-005-2 standard? If no, please indicate in the comment section what suggested changes would put you in favor of the new revised standard.

☐ Yes
☒ No

Comments: The proposed definition of Support Personnel is intended to respond to a FERC Order 742 Directive. However, the proposed definition lacks clarity of scope. The definition is sufficiently broad and subject to interpretation that other personnel could, inadvertently, unintentionally and unnecessarily, also be swept into the definition. We recommend tighter wording which more closely parrots the FERC Directive. Proposed Alternate Wording:

**Support Personnel:** Individuals who carry out outage coordination and assessments in accordance with IRO-004 and TOP-002, or determine SOLs, IROLs or operating nomograms\(^1\) for Real-time operations in accordance with IRO-005 and TOP-004. This definition includes:

(i) Reliability Coordinator personnel who conduct Contingency analysis studies to identify potential interface and other SOL and IROL violations (IRO-004), and who identify the cause of any potential or actual SOL or IROL violations (IRO-005); and/or

(ii) Transmission Operator personnel who perform seasonal, next-day, and current-day Bulk Electric System studies to determine SOLs (TOP-002 and TOP-004);
The specific FERC Order 742 Directive wording was:
“...[Who] carry out outage coordination and assessments in accordance with Reliability Standards IRO-004-1 and TOP-002-2, and those who determine SOLs and IROLs or operating nomograms in accordance with Reliability Standards IRO-005-1 and TOP-004-0.”

There is an inconsistency between the VSLs for R1 and R5.

Both R1 and R5 require that the Responsible Entity use a systematic approach to training to develop a training program (note that in R5, it’s training only, not a training program) for their personnel. The VSL for R1 does not have a level for failure to demonstrate that the Responsible Entity used the SAT to develop the training program. However, a Responsible Entity is assigned a High VSL for failing to use a systematic approach to training to establish training requirements as defined in Requirement R5. The two VSL sets should be consistent with respect to the requirement for using SAT. We suggest the SDT to revise the VSL for R1 to include this violation condition. Refer to the response to Question 2 that references the Rationale Box for R5.

Because of the issues mentioned above concerning the proposed definition of “System Operator”, unless it is withdrawn or until the PER team revises it to specifically include only Reliability Coordinators, Transmission Operators, and Balancing Authorities we cannot support the Standard.

The scope changes, the changes proposed for requirements above, and the discussions regarding R5 are essential to make the standard “results based” and to meet quality review requirements for use.