

Comment Form – Proposed System Personnel Training Standard

**COMMENT FORM
Proposed System Personnel Training Standard**

This form is to be used to submit comments on the proposed System Personnel Training Standard Authorization Request. Comments must be submitted by **January 07, 2005**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words “System Personnel Training SAR Comments” in the subject line. If you have questions please contact Mark Ladrow at mark.ladrow@nerc.net on 609-452-8060.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

- DO: **Do** enter text only, with no formatting or styles added.
 Do use punctuation and capitalization as needed (except quotations).
 Do use more than one form if responses do not fit in the spaces provided.
 Do submit any formatted text or markups in a separate WORD file.

- DO NOT: **Do not** insert tabs or paragraph returns in any data field.
 Do not use numbering or bullets in any data field.
 Do not use quotation marks in any data field.
 Do not submit a response in an unprotected copy of this form.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
Email:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/>	5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC		
<input type="checkbox"/> NA - Not Applicable		

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Background Information:

Posted for comments is the first posting of the System Personnel Training Standard Authorization Request. The US-Canada Power System Outage Task Force identified training as one of several initiatives that should be undertaken to enhance the reliability of the bulk interconnected grid. In their report on the August 14, 2003, outage the task force stated “Any person with access to a control room should be trained so that he or she understands the basic functions of the control room ... under any conditions.” This Standard Authorization Request was initiated, in part, to address this recommendation.

The requestor would like to gauge the level of consensus regarding the scope of this SAR and to obtain the input of the industry prior to determining the final scope and requirements of the SAR. Accordingly, your comments included on this form, emailed with the subject “System Personnel Training SAR Comments” by January 07, 2005, would be appreciated.

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Question 1: Do you agree there is a reliability need for the proposed training standard?

Yes

No

Comments

There is a need for a training standard and we applaud the intent. Such a standard should be the single location for all training requirements (presently training requirements are found in several locations) for the appropriate functions. However, the proposed standard appears to apply a "one size fits all" approach to every authority and function. If this is the case, then this approach is likely to be unrealistic. It should be clear as to which functions should be certified versus having taken accredited courses. Also, clarity is needed that there will be different types of certification rather than just NERC Operator Certification.

NERC needs to better define the Scope of this standard. Is the intent of the standard to measure compliance of the the training of (reliability entity) personnel regarding NERC Reliability Standards, or is the standard meant to measure compliance of all Training Programs? If the intent is the former, then the question is , is there enough material to really test ?, since some of the NERC standards applying to owners for example only require communications of data. If the intent is the latter, then the question is, is NERC the right organization to evaluate in-house training programs? given the diversity of operating approaches used in North America. In this case, the some programs are probably better evaluated by those closer to the needs and responsibilities of the individual organization.

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Question 2: Regarding the applicability of the SAR:

Indicate which of the following you believe the proposed standard should apply:

- | | |
|--|---|
| Reliability Authority/Coordinator | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| Balancing Authority | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| Interchange Authority | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Planning Authority | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Resource Planner | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Transmission Service Provider | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Transmission Planner | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Transmission Service Provider | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Transmission Owner | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Transmission Operator | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| Distribution Provider | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Generator Owner | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Generator Operator | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Purchasing-Selling Entity | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Market Operator | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Load-Serving Entity | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |

Comments

Support staff and other operators not required to be certified should be able to meet their obligations by participating in NERC continuing education.

TSP is listed twice. Was there supposed to be some other entity?

The industry needs a little more definition and clarity on who is the functional entity (IA, RA, PA, etc.)

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Question 3: Do you believe the content as outlined in the Standard Authorization Request is adequate?

Are additional elements that should be included in this proposed standard?

Yes

No

If yes, please explain.

There are two conflicting questions. The training program requirements are more than adequate (and may not be necessary for some training programs).

Are there existing elements that should be excluded in this proposal?

Yes

No

If yes, please explain.

Again, the one size fits all causes problems. What type of emergency (or situational awareness or simulator) training should PSE, IA or Planning Authority participate? As another example, why do all these entities need to perform independent JTAs when it's likely something will need to be created at the NERC level to review the JTAs (unless the intent is to check compliance by seeing if there is a document called "JTA" as opposed to a thoughtful analysis).

Comments

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Question 4: Do you believe there are any regional differences that should exist in the proposed standard?

Yes

No

If yes, please list the region-specific differences.

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Comments

There will be site-to-site differences. There would be some regional differences in content and topics, but there should be no regional differences in general training requirements. Some of the NERC functional definitions need more detail (who is the transmission operator, interchange authority, reliability authority, etc.).

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Question 5: Do you believe it is practical to implement the proposed standard with the existing staffing levels?

Yes

No

If no, please explain what staffing changes might be needed.

Each location would have different requirements. In general, there would likely be an additional person needed for every 5-10 people subject to this standard (to maintain the program, coordination training and provide relief for workers to participate in training, etc.). In addition, each organization subject to this standard would need a person for each occupation (for perhaps a year) to develop the program and get it started. A simulator requirement would add workload (setup, maintenance and running scenarios).

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Question 6: How and how often should training programs be reviewed for compliance with the standard?

Comments

Every 3-5 years as part of normal compliance review. The organization's ability to meet the other NERC standards is a measure of the success of their training program.

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Question 7: Please enter any additional comments you have regarding the proposed SAR below.

Comments

Again, the one-size-fits-all approach does not appear to be justified. If an operator or authority does not need to be certified, their training requirements should be less. Continuing education with some focus on recommended topics that could be tailored locally would be valuable and would relieve much of the administrative burden.

It might be better if this standard applied (for now) only to those entities that must be certified. Training of everyone is important and necessary, but consider the administration if NERC required that each RRC check every generator operator and purchasing selling entity training records versus this standard. If the industry agrees that Generator Operators and others need to be certified then apply the standard. Again, training programs are probably better evaluated locally.

A continuing education requirement with some in a set of approved topics may be more appropriate for non-certified entities.