

Comment Form Proposed Transmission Operator Certification Standard

This form is to be used to submit comments on the proposed Draft 2 of the Transmission Operator Certification Standards. Comments must be submitted by **July 1, 2005**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "TOP Certification Standards Comments" in the subject line. If you have questions please contact Mark Ladrow at mark.ladrow@nerc.net or by telephone at 609-452-8060.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE AND IT IS THEREFORE IMPORTANT TO ADHERE TO THE FOLLOWING REQUIREMENTS:

- 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"/>	
<input type="checkbox"/> NA - Not Applicable	<input type="checkbox"/>	

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The Standard Drafting Team developed the TOP Certification Standards based on the scope outline in the related SAR, the Reliability Functional Model, and the Version 0 Reliability Standards. The reader may find it useful to review these documents to help understand the Standard Drafting Team's philosophy in creating this group of standards. The documents can be accessed at the following links:

TOP SAR and Related Documents: <http://www.nerc.com/~filez/standards/Certification-Transmission.html>

Functional Model and Related Documents: <http://www.nerc.com/~filez/functionalmodel.html>

The current draft reflects the industry's comments on the SAR, industry comments on any prior drafts, and any comments, that were relevant to the class of certification standards, received during prior postings. Additional changes were made in the drafting of the standard to reflect the revisions made to the Functional Model since the drafting of the SAR.

The Certification Standard Drafting Team would like to receive industry comments on this group of standards. Accordingly, we request your comments included on this form, emailed with the subject "TOP Certification Standards Comments" by **July 1, 2005**.

Comment Form Proposed Transmission Operator Certification Standard

Standard – ORG-001-1 – Transmission Operator Certification – Certification

Based on comments received during the 1st posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

1. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Certification standard?

Yes

No

1. Comments: Requirements 1 and 5 are redundant. We suggest that R5 should be deleted.

Standard – ORG-002-1 – Transmission Operator Certification – Agreements

Based on comments received during the 1st posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

2. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Agreements standard?

Yes

No

- 2. Comments: (i)- For each element in Requirements 2.1 to 2.7, we suggest to replace the word "commitment" with "obligation" Obligation is a stronger word.**
(ii)- We understand that the tasks were obtained using the Functional Model, however, we believe that this standard needs to reflect actual situations. We therefore recommend that requirement 2.1.3 and 2.1.12 be modified by deleting/dropping "construction plans". Construction plans will typically come from the transmission owner directly or through the transmission operator.
(iii)- Requirement R1.1 requires the TOP to "train" their operators and ensure they "understand" their obligations and responsibilities. The use of the word "understand" is too subjective. If the intend is to "test" operators to ensure they understand the requirement, it should say that, or just leave it as a requirement to provide training on the subjects.

Standard – ORG-003-1 – Transmission Operator Certification – Personnel

Based on comments received during the 1st posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

3. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Personnel standard?

Yes

No

Comments:

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Standard – ORG-004-1 – Transmission Operator Certification – Data Acquisition and Monitoring

Based on comments received during the 1st posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

- 4. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Data Acquisition and Monitoring standard?**

Yes

No

Comments: (i)- Requirement 1 - "periodicity of transmittal" and "time frame" appear to mean the same thing.

(ii)- We recommend that Requirements 2.6 and 3.2 be modified by deleting terminology "construction plans".

(iii)- In order to be consistent with the content and intent of this certification standard, the wording in the Purpose section need to be modified to include more than real-time data (e.g. generator maintenance plan, transmission maintenance plan, etc).

Standard – ORG-005-1 – Transmission Operator Certification – System Analysis

Based on comments received during the 1st posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

- 5. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – System Analysis standard?**

Yes

No

- 3. Comments: Requirement 1 - Indicate whose operating personnel are to be alerted.**

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Standard – ORG-006-1 – Transmission Operator Certification – Emergency Operations

Based on comments received during the 1st posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

6. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Emergency Operations standard?

Yes

No

Comments: (i)- The entity seeking certification must have the capability to continue operations during emergency conditions. The entity must have communication protocols in place to allow other transmission entities to communicate vital information via more than one communication media. This needs to be clearly reflected/updated in the standard.

(ii)- re: R1: It needs to be indicated that TOP's processes and directing the actions are applicable to Generator Operators(s), Transmission Owner(s), Load Serving entities and Distribution Provider(s). It should be consistent with ORG-002 (TOP Certification- Agreements)

(iii)- Requirement R1.2, "Is experiencing an actual Emergency" is very broad and vague. The term Emergency needs to be defined and tied to a common reference so this requirement can be implemented consistently across all TOPs.

Standard – ORG-007-1 – Transmission Operator Certification – Loss of Control Center Functionality

Based on comments received during the 1st posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

7. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Loss of Control Center Functionality standard?

Yes

No

Comments: (i)- Requirement 1 needs to state a minimum time required to activate the backup plan including continued operation with the functions identified in Requirement 2. Without a minimum time an TOP could be compliant even if it took 24 hours.

(ii)- If the TOP's primary facility becomes unavailable the TOP's responsibilities will need to be taken over by another "physical" facility. This physical back up facility could be a full back up center, a shared back up center, contracting with another entity, etc. The plan for continued operation should require identifying the TOP's physical plan for a back up control center.

(iii)- The existing version-0 NERC standard (re:EOP-008-0) prescribes a requirement that clearly outlines that the interim provisions must be included if it is expected to take more than one hour to implement the contingency plan for loss of primary control facility. It is recommended to include the existing clause/requirement into this proposed ver-1 standard.

(iv)- re: R1: The foot note statement related to SCADA (voice) is confusing. The footnote needs to be clarified and/or reworded.

(v)- With regards to R-2.4, the requirement to have provision/coordination of construction plans with RC can be construed as business continuity requirement rather than a back up control center requirement. We suggest deleting the construction plan related requirement from this standard.

Standard – ORG-008-1 – Transmission Operator Certification – Restoration

Based on comments received during the 1st posting of the Transmission Operator Certification Standards, the Drafting has made modification to provide clarification to the standard.

8. Do you agree with the Introduction, Requirements, Measures, and Compliance elements identified for the Transmission Operator Certification – Restoration standard?

Yes

No

Comments: There may be a need to included a minimum list of items that need to be included in the TOP restoration plan

9. Please identify any elements that should be included in the standards that have not been identified?

4. Comments: Additional Comments:

(i)- The ISO/RTO Council has a general concern with regard to the existing NERC Registration Process and the ultimate TOP Certification Process. The concern regards the consistency, or lack thereof, of TOP registrations already performed, and the various interpretations within the industry of what constitutes a TOP. The ISO/RTO Council believes that guidelines must be established that provide consistency in registration and ultimately certification. Our understanding is that these issues are under consideration at the Functional Model Working Group and we would ask that these guidelines be developed and included in the revised Functional Model or be included in the implementation plan for the TOP Certification Standard.

(ii)- With regards to the definition of the Agreement, we recommend that following wording should be added in the beginning of the proposed statement/definition of Agreement i.e. “For purposes of applying the term ‘Agreement’ within this standard it shall mean.....”

(iii)- It is expected that audits will be conducted for these standards. In that case we suggest that data retention period for any audit results be specified.

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(iv)- Moreover, the implementation and application of this standard in terms of coordination with other Functional Model related entities should need to allow for a transition period until the FM related entities are either fully registered or certified. Moreover, these entities (such as GOP, DP, etc..) need to be clearly defined and registered/certified before the implementation of this certification standard.

10. Please identify any regional differences that should be included in the standards?

Comments: