

Comment Form — 1st Posting of the draft 'Transmission Operator Certification' Standard

Note – This form is to be used to comment on version 1 of the Transmission Operator Certification Standard.

Comments will be accepted from January 3, 2005 — February 18, 2005

Please review the draft standard and answer the questions in the yellow boxes. Send completed comment forms to sarcomm@nerc.com

If you have questions, please call Gerry Cauley at 609-452-8060 or send a question to gerry.cauley@nerc.net

SAR Commenter Information (For comment from individual entities)
Name
Organization
Industry Segment
Telephone
E-mail

Key to Industry Segment #'s:
1 – Trans. Owners
2 – RTO's, ISO's, RRC's
3 – LSE's
4 – TDU's
5 - Generators
6 - Brokers, Aggregators, and Marketers
7 - Large Electricity End Users
8 - Small Electricity Users
9 - Federal, State, and Provincial Regulatory or other Govt. Entities

SAR Commenter Information (For Industry Groups Submitting Group Comments)		
Name of Group: <i>RTO/ISO Standards Review Committee</i>	Group Representative: <i>Karl Tammar</i>	
	Representative Phone: 518-356-6205	
	Representative Email: ktammar@nyiso.com	
List of Group Participants that support these Comments:		
Name	Company	Industry Segment #
<i>Dale McMaster</i>	<i>AESO</i>	<i>2</i>
<i>Ed Riley</i>	<i>CAISO</i>	<i>2</i>
<i>Sam Jones</i>	<i>ERCOT</i>	<i>2</i>
<i>Peter Henderson</i>	<i>IESO</i>	<i>2</i>
<i>Peter Brandien</i>	<i>ISO-NE</i>	<i>2</i>
<i>Bill Phillips</i>	<i>miso</i>	<i>2</i>

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<i>Karl Tammar</i>	<i>NYISO</i>	<i>2</i>
<i>Bruce Balmat</i>	<i>PJM</i>	<i>2</i>
<i>Charles Yeung</i>	<i>SPP</i>	<i>2</i>

Background Information:

- To understand the Standard Drafting Team’s philosophy used to create the standard, refer to the Transmission Operator Certification SAR, the Functional Model, and its Technical Discussion Document. These documents were used in the drafting of the standard and can be accessed at the following links:

ftp://www.nerc.com/pub/sys/all_updl/standards/sar/TOP_CERTIFICATION_01_03.pdf
<http://www.nerc.com/~filez/functionalmodel.html>

Changes were made in the drafting of the standard to reflect the revisions made to the Functional Model since the drafting of the SAR.

Transmission Operator Certification – Certification Modification

In response to the 2nd posting of the Balancing Authority Certification Standard, the Drafting Team received more comments regarding the inclusion of the certification process in the standard. After further consideration of the comments received, the Standard Drafting Team has modified this standard regarding the inclusion of the process and wishes to provide some background information to the industry in seeking affirmation of the modifications.

Comments regarding the inclusion of the certification process in the standard began during the SAR process. Early in the development phase, the SAR Drafting Team sought the guidance of NERC legal counsel vis-à-vis the certification process. The opinion expressed by NERC’s legal counsel, at that time, was that since there was no other procedure in place for approval of the certification process, it should remain in the standard in order to maintain a consistent implementation. There was some concern expressed that although the process was in the standard, it did not necessarily fit the typical standard format. The Drafting Team was able to achieve industry consensus and produce the initial standard with the certification process included as part of the standard. A minority opinion opposed to the inclusion of the certification process in the standard continued to be expressed by some members of the Drafting Team, as well as, some from the industry.

Some time after the SAR was approved, and had proceeded to the Standard Drafting phase, the Certification & Compliance Committee (CCC) was formed. The responsibility for developing administrative procedures for NERC Certification Programs is part of the scope of this Standing Committee.

As a result of the continued comments regarding nesting the certification process being within the standard and the formation of the CCC, the Drafting Team again sought the input of NERC legal counsel. NERC’s legal counsel recommendation was to remove the certification process from the standard and place it in the area of responsibility for the CCC. The Drafting Team anticipates that the CCC will refine the current process, seek industry input, incorporate the input obtained into the process, and then seek NERC Board of Trustees approval for adoption. By utilizing the preceding process, an administrative advantage is realized by allowing necessary adjustments to refine the certification process to be accomplished more expeditiously than if the certification process were part of the standard. This procedure is analogous the procedures that are being used for the Control Area Readiness Audits. Although the certification process would not be a standard, it is still anticipated that all certifications would be administered consistently throughout the industry. The Drafting Team has included this requirement in the modifications that have been made to the standard.

In modifying the standard, the Drafting Team has maintained some key elements to ensure: consistent administration of the certification process, the criteria that must be adhered to, and established a clear requirement that all entities performing the Transmission Operator function must be NERC Certified.

As a result of the events described above, the Standard Drafting Team has made these modifications to the standard and seeks industry affirmation and support for its actions.

1. Do you agree with the modifications made to the Transmission Operator Certification – Certification standard in removing the administrative process from the standard?

Yes

No

Comments: Provided that the certification process goes through an ANSI approved process

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

Yes

No

Comments:

- 1) The standard needs to be clarified to state that one certification process is all that is necessary for a TOP which operates across multiple regions.
- 2) Requirement 2.3 states that the entity to which a task is delegated is subject to review to ensure that the capability exists for them to perform the task as required in the standard. What standard is it referring to? Please clarify or drop the reference to standard.

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

Yes

No

Comments:

- 1) Requirement 1.1 should be deleted as its intent is included in requirement 1.2
- 2) For each element in Requirements 2 through 11: replace the word "commitment" with "obligation" Obligation is a stronger word.
- 3) 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 2.3 be modified to be "Obligation to provide transmission maintenance plans to the reliability authority" (Drop construction plans). Construction plans will typically come from the transmission owner directly or through the transmission operator. If construction plans must be provided, then requirement 7 needs to be modified.
- 4) Requirement 3.1 Change to "Obligation to operate the transmission system to respect the generator facility ratings provided by the Generator Operator".
- 5) Add a new requirement R3.3 Obligation of Generator Owner to provide the generator information as requested by the Transmission Operator.
- 6) Modify requirement 4.1 "The Generator Operators's obligation to provide the transmission Operator with reactive supply and to immediately report any change in status of automatic voltage regulators or Power System Stabilizers".

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

Yes

No

Comments:

1) Need to be specific that delegated tasks require that the entity performing those tasks does not need to be a certified entity but must have NERC certified system operators performing those tasks as identified in R1.1.1. through R1.1.7.

2) Requirement 1.1.7 needs to be clarified as to its intent. We understand the task came from the Functional Model but as written it is unclear as to which personnel it applies to. Does the Transmission Service Provider need to be a NERC certified system operator?

5. 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: 1) Number is incorrect: it should be ORG-004-1

2) Requirement 2.3 may in fact come from the Transmission Owner or the Transmission Planner. The requirement should reflect that condition. Also any changes made in this section will require parallel obligation in the agreements section.

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

Yes

No

Comments: Number is not correct: it should be ORG-005-1

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

Yes

No

Comments: 1) Number is not correct: it should be ORG-006-1

2) M1 the measure should be to the Regional Reliability Organization (it has RRA)

3) requirement R3: It is suggested to add Transmission Owners and Load Serving Entities i.e. The revised R3 should read as follows: The TOP shall have procedures and processes to direct actions of Generator Operators(s), Transmission Owner(s), Load Serving entities and Distribution Provider(s) under an

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

Yes

No

1. Comments: The existing ver-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 this existing clause/requirement into the proposed ver-1 std re: ORG-007-1.

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

Yes

No

Comments: Number is not correct: it should be ORG-008-1

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

Comments: 1) Separate compliance elements for this certification standard does not work. There is one compliance check (standard ORG-001-1) for the entire collection of certification standards. Certification is only achieved with ORG-001-1.

2) The standard should include some discussion concerning what happens if an entity does not meet one of the ORG standards. How long does it have to correct the short-comings. Once it is compliant with one of these standards does the entity retain that compliance level forever? Need to add something like, if the entity fails to complete ORG-001-1 within one year, compliance with the other)RG-002 through 007 are revoked

3) Presently, there are various requirements outlined for meeting objectives of Transmission Operator Certifications and/or Registration process. These pertain to (i) TOP FM Certification - tasks/responsibilities (ii) Ver 1-TOP Certification Standards and (iii) Ver 0 TOP Registration requirements. Various issues related to ver-0 registration process and FM area also being reviewed. It is recommended that the proposed ver-1 TOP Certification Standards should be thoroughly reviewed and re-assessed by SDT based on the outcomes/resolutions of existing registration and any FM updates/revisions.

4) TOP certification standards: Although the measures pertaining to requirements are specified in these standards yet the compliance related requirements and/or levels of non-compliance are not specified. For the purposes of effective implementation/enforcement of these standards, we recommend that the associated compliance monitoring process and levels of non compliance should also be specified.

5) The requirement to have procedures, processes or coordination mechanisms in place with other Functional Model related entities should need to allow for a transition period since the FM related entities are not yet certified. Moreover, these entities ((such as RA, BA, GOP, LSE, DP,

etc..) be clearly defined and certified before the implementation of this certification standard..

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

Comments:

None