

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)

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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

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: Since it is possible for a single entity to perform more than one part of the Market Operations Functions, the Reliability Service Functions and/or the Planning & Operating Functions, organizations that will perform cross-functional tasks must clearly identify that they will be doing so in their application for certification. The CCC must ensure that they are aware of the cross functional tasks, and that the organization applying for the certification can successfully accomplish the requirements of each area they are applying for while maintaining the appropriate separation between operating the marketplace and electric operations.

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

Yes

No

Comments:

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

Yes

No

Comments:

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

Yes

No

Comments:

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:

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

Yes

No

Comments:

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

Yes

No

Comments:

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

Comments:

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

Yes

No

Comments:

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

Comments: **As a general comment, none of the certification forms express the timeframe for re-examining compliance with certification nor is there any of the compliance elements filled in.**

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

Comments: