

**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](mailto:sarcomm@nerc.com)**

*If you have questions, please call Gerry Cauley at 609-452-8060 or send a question to [gerry.cauley@nerc.net](mailto: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 2<sup>nd</sup> 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: We agree that the Administrative Process should be removed from these standards, provided the process, once developed goes through the entire ANSI Certified 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. The requirement 3.1 needs to be changed to read as follows: "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".
7. CHANGE the statement in R-5 from quoted "The Transmission Operator shall have agreement(s) with the Planning Authority. The agreement shall include the following:...." to the following statement i.e. "The Transmission Operator shall have agreement(s) with the Planning Authority to provide the following:
8. Delete "construction plans" from R5.1
9. The requirement R6 should be revised as follows: " The Transmitter Operator shall have agreement(s) with each of the Load Serving Entity and distribution Providers in its area....."

10. R6.1 should reflect the LASE role as well i.e. "R6.1 to be revised as follows " The LSE and Distribution Providers ....."
11. It needs to be clarified that why is R8.1 requirements being restricted to only DC tie operations and not phase angles related requirements etc....
12. With regards to requirement R9.1, please clarify that who has the obligation to reduce voltage or shed load? Is it Balancing Authority or Transmission Operator"
13. With regards to section C "Measures": the specific measures should be listed pertaining to each requirement of this standard.

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

- Yes  
 No

Comments: 1) In R1 the terminologies for certification credentials "Transmission", "Balancing Interchange and Transmission" and "Reliability" needs to clearly defined.

2) R1.1.4 should be revised as " Request Reliability authority or act to mitigate equipment overloads"

3) R 1.1.6 should be revised as: "Direct Load Serving Entity and Distribution Providers to shed load"

5) 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.

6) 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?

7) section D compliance : 1.1: should be revised as follows: " The Transmitter Operator shall provide documentation that demonstrates that all system operating personnel performing....."

**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) re: section "Number" TOP-012-1 should be corrected to read "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.

3)the words "construction plans" should be deleted from R3.2 because this is a task that should be assigned to the transmission owners rather than the TOP. We recognize that this is in the current Functional Model, but we feel strongly that this is a TO function.

4) R3.3 should be revised as follows" Coordinate and resolve conflicts with adjacent Transmission Operators"

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

Yes

No

Comments: 1) In section "Number" TOP-013-1 should be corrected to read "ORG-005-1"

2) In section B. requirements, a leadin sentence/qualifier should be added such as "The Transmitter Operator shall have processes, procedures and plans in place including:"

**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) re: section "Number" TOP-014-1 should be corrected to read "ORG-006-1"

(2) section C M1 refers to Regional Reliability Authority (RRA). This term needs to be clarified and/or corrected, as applicable. Is the intent that this be a RRO?

(3) re: requirement R3: It is suggested to add Transmission Owners and Load Serving Entities to the list. viz. 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

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

2) A new requirement R1.6 should be added to have the procedures & processes in place in the event of infectious diseases such as SARS ,

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

Yes

No

14. Comments: 1). re: section "Number" TOP-016-1 should be corrected to read "ORG-008-1

15. 2). re: Section B Requirements R2...Security and confidentiality of data needs to be incorporated into the standard. Accordingly, it is suggested that the existing statement "Transmission Operator shall provide its restoration plan to its Reliability Authority" should be qualified with the revised statement as follows: ".....shall make available upon request subject to confidentiality and non disclosure arrangements to ensure physical security of the assets..."

3) re: Section R1 Functional Model defined entities (such as Distribution Provider, RA, etc....) should be clearly defined and certified before the implementation of this certification standard.

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

Comments:

1) Presently, there are various requirements outlined for meeting objectives for Transmission Operator Certifications and/or registration. 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. Issues such as allowing the registration of multiple entities as TOPs for the same transmission system will result in a complexities in the compliance monitoring and enforcement process.

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.

2) 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.

3) 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?

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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.

4) 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