ISSUES RAISED BY FERC IN PER NOPR (PER-005-1 and PER-004-2)

SYSTEMATIC APPROACH to TRAINING (SAT) – p.13

1. Understanding of Reliability Coordinator Area (requirement clarification/more explicit) – p.15

   Do R1 and R2 of PER-005-1 retain an obligation (as is currently the case with R3 and R4 of PER-004-1) for RC operating personnel to have a “comprehensive understanding of the RC area and interactions with neighboring RC areas”?

   * FERC seeks comment on its concern that such an obligation is not retained in PER-005-1, and if it is not, that maybe it should be explicitly included.

2. Continual Training (requirement clarification/more explicit) – p.17

   * FERC seeks comment on its concern that PER-005-1 does not retain an obligation for “continuing training,” as is the case with PER-002-0/R3.2 (“training program must include a plan for the initial and continuing training of TOPs and BAs operating personnel”).

3. Training Staff Identity and Competency (requirement clarification/more explicit) – p.18

   * FERC seeks comment on its concern that PER-005-1 does not retain the requirement found in PER-002-0/R3.4 that training staff be “identified” and its “competency” ensured.

TRAINING EXPECTATIONS FOR EACH JOB FUNCTION / TAILORED TRAINING – p.18

   FERC is concerned that the 693 directive for NERC to modify the PER standards to identify the “expectations of the training for each job function and develop training programs tailored to each job function with consideration of the individual training needs of the personnel” may not being met in PER-005-1/R1.2 with “design and develop learning objectives and training materials based on the task list created in R1.1.”

   * FERC seeks comments on its understanding that SAT should include the assessment of factors such as educational, technical, experience, and medical requirements that candidates must possess before entering a given training program.

   * The Commission also seeks comment on whether PER-005-1/R1.2 requires that the learning objectives and training materials be developed with consideration of the individual needs of each operator.
SIMULATION TRAINING – p.20

* Do you think that PER-005-1/R3.1 enhances the existing requirements governing simulation training by providing operating personnel with hands-on simulation training experience in dealing with possible emergencies or other system conditions? If no, why?

* Does PER-005-1 take into account the size of an entity, as allowed by 693, by requiring such (simulation) training only for entities with operational control or authority over facilities with established IROLs (or) have established operating guides or protections systems to mitigate IROL violations?

* In PER-005-1/R3.1 there is a mandate that the simulation technology is to replicate the operational behavior of the BES during normal and emergency conditions. FERC thinks that this provision requires the use of simulators specific to an operator’s own system. Thoughts?

* Should PER-005-1 require the simulation technology to realistically replicate an entity’s own topology and operating conditions?

* Will training on simulators that replicate a different system provide operating personnel emergency system training with sufficiently realistic simulations to enable them to act in an actual emergency?

* What are your thoughts on the feasibility and practicality (including cost considerations) of requiring use of simulation technology that realistically replicates the entity’s own topology and operating conditions?

LOCAL TRANSMISSION CONTROL CENTER OPERATOR PERSONNEL – p.25

In 693, the Commission rejected NERC’s concept of relying on the transmission operator’s obligation to train its personnel to ensure that local transmission control center operator personnel receive training.

* PER-005-1 does not explicitly include a requirement that covers formal training for local transmission control center operator personnel, as directed in 693. FERC directs NERC to include such a provision. Thoughts?
PERFORMANCE METRICS – p.28

In 203, the Commission directed NERC to determine “whether it is feasible to develop meaningful performance metrics associated with the effectiveness of a training program…, and if so, develop such performance metrics.”

While NERC evaluated whether metrics were needed to assess each individual program, FERC is not satisfied that NERC evaluated whether performance metrics could be devised to evaluate the Reliability Standard.

* FERC seeks comment on possible performance metrics that could be used to assess whether PER-005-1 achieves its stated purpose “[to] ensure that System Operators performing real-time, reliability-related tasks on the BES…are competent to perform those reliability-related tasks.”

EFFECTIVE AND RETIREMENT DATES – p.31

FERC is concerned that the proposed effective and retirement dates of the new standards may create a gap in compliance and enforceability. The proposed standards currently allow for the following effective/retirement dates:

**PER-005-1**

**R1 and R2:** The first day of the first calendar quarter, 24 months after regulatory approval

**R3:** The first day of the first calendar quarter after regulatory approval.

**R3.1:** The first day of the first calendar quarter, 36 months after regulatory approval.

**PER-004-2**

- Retire PER-004-1/R2 when PER-005-1/R3 becomes effective.
- Retire PER-004-1/R3 and 4 when PER-005-1/R1 and 2 become effective

* FERC is seeking comments on the possible compliance/training confusion caused by the staggered effective/retirement dates, as well as possible alternative approaches.

* FERC is also seeking comments on the length of the lead-time before the various requirements in PER-005-1 become mandatory and enforceable, which is currently as long as 3 years, and, more specifically, comment on the need for the proposed 2 and 3 year lead times.
In 693, the Commission directed NERC to expand the applicability of the currently effective PER-002-0 to include (1) generator operators; (2) operations planning and operations support staff; and (3) to consider whether personnel that support Energy Management System (EMS) applications should be included in the mandatory training required by PER-002-0.

In response to these 693 directives, NERC acknowledges that PER-005-1 does not establish training obligations for generator operators, operations planning and operations support staff, or consider EMS support personnel.

NERC indicates that it intends to address the expansion of the training standard in Project 2010-01 – Support Personnel Training, with a targeted completion date of fourth quarter of 2011.

* FERC thinks that NERC’s proposed completion date (4th quarter of 2011) is a reasonable deadline, but seeks comments from the industry on whether it is reasonable, or whether, for good cause, another timeline for completion of this work is necessary.