

TO/TOP Registration Compliance Issues NERC Certification

FirstEnergy Position:
Option 4

Option 4 – Bridge the Gap

- Option 4 – Rather than “explain away” the gap between PJM Certification and NERC Certification as outlined in Option 3, “bridge” the gap so that NERC accepts the PJM Certification Program as another form of NERC system operator certification.

Process

- Perform the detailed comparison and investigation of NERC/PJM certification program and examinations, including recertification, suggested in paragraph #5 of Martin Sidor's September 15, 2009 letter to Tom Bowe
- Identify the gaps between PJM and NERC certification/recertification
- Bridge the gaps so that PJM's certification is aligned with NERC's
- Request NERC's acceptance of the PJM certification process

Pros

- Maintains commitment to PJM Certification
- Provides NERC equivalency, but not “NERC Certification”
- Will get us what we originally wanted; NERC acceptance of the PJM certification program
- PJM TOs drive outcome
 - Not confrontational with NERC
 - Addresses concerns about the PJM TOP-TO relationship (without implicating compliance registry)
 - Reduces compliance questions in CVIs
 - No need for reliability standards “interpretations”

Cons

- Impact to TO's System Operators
- Training and Testing Costs