

TO/TOP Registration Compliance Issues

NERC Certification & TOP & TO Matrix

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- Discuss with the TOAAC various options concerning NERC Certification and our regulators' apparent compliance expectations.

- P1407

The Commission . . . Is persuaded not to require generator operators or transmission operators at local control centers to be NERC certified at this time . . .

Project 2007-04 — Certifying System Operators — discuss inclusion of “delegation” in requirements

- NERC Staff recommends removing language that would require entities that perform functions on behalf of RC, TOP, or BA to have NERC certified operators. SDT does not agree, and believes the statements are necessary to ensure there are no gaps.
- NERC SC consensus is that this is a compliance registry issue, not one to be addressed in the standards.
- Motion approved to request compliance staff to expedite the draft guidelines on how they address delegated / shared tasks.
- The SDT chair stated that the language would be removed from the Standard.

- Option 1 – Do Nothing
- Option 2 - All TO's Operators get NERC certified
- Option 3 - PJM Certification Meets the Standard

- Steps to Take
 1. Really the Status Quo
 2. Continue to remain silent on the issue, but
 3. Continue to require PJM's Certification and Training

- PRO's
 1. Has the least near term impact on those TO's without NERC certified operators
 2. PJM's TO's Operators remain focused on the actual PJM practices they implement under PJM's direction

- **CONS**

1. Counter to the intent of the FPL Order (i.e., FPL must certify its Load Dispatchers)
2. PJM and its TOs may be perceived uncooperative
3. CVI's may only increase and our current operating protocols may be seen as less compliant
4. Nuclear Option??? - the ERO and FERC may require the TO's to register as TOP's

- Steps to Take

1. Request written clarification from NERC that if the PJM TO's agree to certify their Operators, they are not by association stating they are TOP's.
2. Propose and Implementation Program to NERC
3. Create training programs to fast forward training assistance

- PRO's

1. May address a number of regulators' concerns about the PJM TOP-TO relationship
2. May reduce compliance questions in CVI's
3. Will not generate further industry enmity on this issue.

- **CONS**

1. Impact to TO's System Operators
2. HR Issues
3. Training and Testing Costs
4. May impact commitment to PJM Certification
5. Slippery Slope on Registration?

- Steps to Take

1. Develop a TO Team to develop recommendations and Help Champion this Effort with NERC.

Potential Courses of Action Include:

1. Argue that PJM Certification is fully Equivalent to the NERC Certification
2. PJM Certification needs a “Bolt On” set of 50 questions to become equivalent”
3. Non-Certified TO Operators are given a reduced NERC exam that is reflective of only the TOP tasks they execute within the PJM TOP-TO relationship
4. Stress not reciprocal nature of certification but that the PJM Certification is appropriate for our relationship.

- Steps to Take (cont.)
 2. Request a meeting with NERC Leadership to discuss the Marty Sidor Letter
 3. Meet with the Complete Personnel Certification Governance Committee (PCGC)
 4. May have to make more of the PJM Test materials open to select members of the PCGC in a controlled manner
 5. Provide NERC and PCGC a recommendation of what elements of the NERC test might be reflective of the role PJM's TO Operators play in

- Steps to Take (cont.)

6. Issues to address within the Marty Sidor letter include:

1. Reciprocity – address this issue by agreeing that any enhanced PJM program is only effective within PJM, because it is tailored only to the relationship with PJM.
2. Agree to the detailed comparison – limited reviewers all documents controlled
3. Interconnected Operations – Outward Perspective within the NERC Exam
4. Pass Rate

7. With PSGC support request NERC Standard change or interpretation

Option 3 - PJM Certification Meets the Standard

– PRO's

1. Process may enhance the industry's awareness of the comprehensive of PJM's Certification Program
2. PJM's TO's Operators remain focused on the actual PJM practices they implement under PJM's direction

– CONS

1. NERC believes that PJM Certification does not equal NERC Certification and PER-003 R1 specifies "NERC Certification" – as such changes require standard changes
2. Any standard waivers or interpretations would require industry approval.
3. Costs – PJM's TO's will need to bare NERC's expenses for setting up and maintaining a different program.

DISCUSSION

- Manuals have been updated to better align with the requirements in the standards
- References to Manuals are more specific than was in the previous version of the Matrix
- Concerns raised concerning approval process.
- Will be ready before December TOAAC meeting

- The Matrix has created a lot of interest with Regulators