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To: [ROPComments](#)
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Subject: Comments on NERC Rules of Procedure sections 600 and 900
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Attachments: [NERC CE Program Reevaluation DEC clean.pdf](#)

The RTO/ISO Standards Review Committee Group of IESO, ISONE, PJM, MISO, SPP, ERCOT and CAISO submit the following comments:

The SRC agrees that changes are needed to the NERC Rules of Procedure (ROP) related to Sections 600 (Personnel Certification) and 900 (Training and Education). However it cannot support the changes as written or reasons given for making them. We will outline these concerns here as well as provide potential solutions in the attached whitepaper.

The NERC Personnel Certification Program began in 1998 and the NERC Continuing Education (CE) Program in 2004. Both programs predate the implementation of mandatory standards in 2007. Entities have been subject to standards that cover both certification (PER 003) and training (PER 005) for some time now. While we agree changes are needed “to clarify the scope of” these programs, the proposed changes do nothing to address the existence of these standards but seem to simply perpetuate the programs much as they have been implemented from their inception.

Further, we do not think it is appropriate to remove “requirements in the NERC ROP” that could have any impact on an entity’s compliance with mandatory standards to committee charters and manuals. Even though these documents are “reviewed annually for updates and revisions are approved by the Board of Trustees”, this does not provide the industry with the same transparency and opportunity to comment on new or changed requirements that could impact compliance with PER 003 and PER 005.

We feel any additional requirements related to certification or training and education should be developed the same way the requirements for PER 003 and PER 005 were; through the existing standard development process outlined in Section 300 of the NERC ROP. This ensures the “essential principles” of Section 304 of the ROP are adhered to (Openness, Transparency, Consensus-building, Fair Balance of Interest, Due Process, and Timeliness).

To continue to develop requirements outside this process may violate the principle or spirit of Section 401.8 of the ROP where entities are not to be subject to multiple enforcement actions. This especially should be considered with the NERC Continuing Education Program. Under PER 005, training providers already have requirements to implement a systematic approach to training (SAT) and have their programs regularly audited. Separate but parallel, the NERC Continuing Education program has its own requirements and audits. As outlined in the whitepaper, these requirements and audits are inferior and may actually work against the implementation of an entity’s PER 005 SAT training program.

We recommend removal of Section 902. While there certainly could be a role for an industry committee to share best practices related to training, this could likely be incorporated into Section

901. It would also be inappropriate to move the existing language of Section 902 to committee charters or NERC manuals. Such language includes; “approving activities and entities”, “develop and implement ... program requirements”, “perform periodic audits”, “oversee ... Providers and activities”, “develop and maintain a process for ... interpretations of guidelines and standards, probation or suspension of NERC-approved Provider status”. With the existence of PER 005, such activities are already covered under Sections 300 and 400 of the NERC ROP.

For the NERC Certification Program, we agree with the continuing role of the Personnel Certification and Governance Committee (PCGC) to create and administer the certification exams that entities use to be compliant with PER 003. Therefore, we agree with most of the changes made to Section 600. However, we do not feel the ROP, committee charter, or certification program manual should contain references to the NERC CE program, CEHs, and re-certification. We feel it is time to re-evaluate how credential maintenance or re-certification is handled. The current tie of the Certification Program to the CE Program did not always exist, but was put in place in 2004 to encourage operator training at a time when there was no mandatory training standard. We feel there are other options; our recommended approach is detailed in the [attached whitepaper](#).