NERC CE Program Reevaluation

Glen Boyle
Manager, System Operator Training
• NERC CE program began in 2004
  – Served a valuable role
  – Becoming obsolete with the advent of PER-005

• Proposal
  – Elimination of NERC CE program
  – Modification to NERC Certification renewal process
    • Maintains NERC Certification in current form
  – Not proposing accreditation
• Mandatory compliance with PER-005 makes CEH program obsolete
  – PER-005 goes beyond CE program
    • Generation Operators, Ops Support personnel, SAT approach, simulation training
    • Stricter enforcement mechanism
  – Other standards include mandatory training (EOP, COM)
  – CE Program creates “quasi-requirements” outside of the NERC Standard process

• CE program deficiencies
  – Could be counter to SAT approach
    • Topics limited to legacy Attachment A
  – HP topics not supported
  – Courses evaluated in isolation
    • Not as part of a holistic training program
  – Increased number of denied courses
    • Though may be required by company SAT approach
Justification

- **Cost and Administrative Burden**
  - ILA completion
  - CEH Fees
  - Audit costs
  - Cost and resource savings could be redistributed to more meaningful areas

- **Problems with SOCCED System**
  - “Near Miss” operator renewals
  - Manual process
  - Security concerns with uploaded information
NERC Certification Renewal

• 2 Options
  – “Drivers License” approach
    • Pass test
    • Pay your fee to renew
  – Maintain current hour requirements but use “SAT training hours”
    • No ILAs
    • Simple hour check
    • Not preferred
Next Steps

- Submitting as comments to changes to NERC Rules of Procedure
  - Sections 600 and 900
  - Comments due 12/24
- Requesting consideration by NERC staff and committees