

**Comment Form
Proposed System Personnel Training Standard**

This form is to be used to submit comments on the proposed System Personnel Training Standard Authorization Request. Comments must be submitted by **March 20, 2006**. You may submit the completed form by e-mailing it to: sarcomm@nerc.com with the words "System Personnel Training SAR Comments" in the subject line. If you have questions please contact Mark Ladrow at mark.ladrow@nerc.net on 609-452-8060.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
 Do use punctuation and capitalization as needed (except quotations).
 Do use more than one form if responses do not fit in the spaces provided.
 Do submit any formatted text or markups in a separate WORD file.

DO NOT: **Do not** insert tabs or paragraph returns in any data field.
 Do not use numbering or bullets in any data field.
 Do not use quotation marks in any data field.
 Do not submit a response in an unprotected copy of this form.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Ron Falsetti	
Organization:	IESO	
Telephone:	905-855-6187	
E-mail:	ron.falsetti@ieso.ca	
NERC Region	Registered Ballot Body Segment	
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> ECAR	<input checked="" type="checkbox"/>	2 — RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> MRO	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> RFC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SERC	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	

Background Information:

Posted for comments is the second draft of the System Personnel Training Standard Authorization Request (SAR). The approach proposed in this revised SAR is to be flexible to the industry in determining their unique training needs and not try to force a single set of training topics on a widely diversified audience. Rather than a “one-size fits all” list of requirements, this approach is based on the fact that quality training results from applying a systematic approach to training that includes training needs assessment, training development, delivery, and evaluation. The standard will provide the framework for a training program based on the tasks performed that impact reliability.

The requestor would like to gauge the level of consensus regarding the revised SAR and to obtain the input of the industry on the scope and applicability of the proposed standards. Accordingly, your comments included on this form, e-mailed with the subject “System Personnel Training SAR Comments” by March 20, 2006, would be appreciated.

Regarding the scope of the SAR:

The SAR Drafting Team is proposing that this SAR will result in two standards:

- One standard will require training all personnel who perform 'real-time operating tasks' that directly impact the reliability of the Bulk Electric System (BES)
- One standard will require training personnel who perform 'support tasks' that directly impact reliability of the BES.

The SAR Drafting Team wants to develop the standard for the personnel who perform 'real-time operating tasks' first, then develop the standard for personnel who perform 'support tasks'.

1. Do you agree with the approach to the training standard to limit the scope of the initial standard to persons performing real-time operating tasks that directly impact reliability of the BES?

Yes

No

Comments

We agree that the scope of the initial standard should cover training program pertaining to real-time operating tasks that directly impact reliability of the BES. However, the way this question is worded (...to persons performing...) and from the SAR as presented, it is not clear whether the proposed standard, even within the aforementioned scope, is intended to set requirements for:

(i) the entities that perform these operating functions to develop the needed training program for their operating personnel to acquire the competency to perform these tasks, or

(ii) the training program to cover a minimum set of topics that enables the operating personnel to acquire the competency to perform these tasks, or

(iii) both of the above or something else.

While we agree with the recommendation that a systematic approach be used to develop the required training program, and further recognize a training standard should not be overly prescriptive as different organizations (entities) may assign different/additional tasks to its operating personnel. We nevertheless believe that absent any specificities such as to whom the standards apply and a high level scope of the minimum tasks or task related topics to be covered by the training program, the need for having an industry-wide standard for personnel training becomes questionable.

In brief, the SAR as written fails to convey the essence of the requirements - to whom the standard apply and whether or not it is a process that is required, which we feel is too vague, or a minimum set of topics that need to be included in the training program, or both.

Regarding the applicability identified in the SAR:

For the Standard that will apply to the personnel who perform 'real-time' operating tasks, the SAR Drafting Team is proposing that the 'Operating Tasks Analysis' being conducted by the NERC Personnel Subcommittee serve as the basis for determining which types of organizations will be required to comply with the standard.

2. Do you agree with the SAR Drafting Team's approach to determining which types of organizations will be required to comply with the standard for personnel who perform 'real-time' operating tasks?

Yes

No

Comments

While we agree that the Operating Tasks Analysis can offer assistance in providing a focus on who and the topics that a training program should cover, the analysis itself is not a critical factor in determining which organizations or functional entities should comply with the training standard (assuming a standard on training program development is needed). Without prejudice to the yet to be made available Operating Tasks Analysis results, we feel that, as a first step, the standard should be directed to at least those recognized entities that must make decisions in implementing, approving or directing others to implement actions that have a direct bearing on system reliability.

At the onset, the functional entities that are required to have a training program should be the prime candidates to comply with such a standard. At present, the certification standards for RC, BA and TOP are being developed and expected to be posting for balloting. Each of these standards contains a requirement for the respective entity (organization) to have a training program and provide its operating personnel with training (e.g. Standard ORG-022-1). Given this requirement, it makes logical sense that a standard on training program development be also applied to these entities.

To require other entities for which an organization certification standard and the corresponding requirement for having a training program do not current exist or expect to be established in the near future would likely be challenged by these other entities. Moreover, the scope of the training standard would be too wide for effective development and compliance monitoring.

Comment Form – Proposed System Personnel Training Standard

For the Standard that will apply to the personnel who perform 'support tasks', the SAR Drafting Team is proposing that an 'Operations Support Task Analysis' planned for development by the NERC Personnel Subcommittee serve as the basis for determining which support tasks directly impact reliability of the BES and for determining which types of organizations will be required to comply with the standard.

3. Do you agree with the approach proposed above to determine which support tasks directly impact reliability of the BES and for determining which types of organizations will be required to comply with the standard?

Yes

No

Comments

We do not hold a position on whether or not the proposed analysis be performed since the priority at this time is to (a) determine the need for having a standard for the entities (or is it the personnel as the question implies?) that perform "direct" tasks, and (b) develop the standard. Extending the standard to cover entities (or personnel) that perform the "support" tasks should be a secondary consideration and, when pursued, can be built upon the structure and success of the initial set.

We agree that the systematic approach will help responsible organizations develop a structured and effective training program for operating personnel to attain the required competency to perform their tasks. We further recognize that the training standards should not be prescriptive as different organizations may assign different tasks to its operating personnel, and hence the standards should provide the flexibility for these organizations to develop the training program according to their specific needs, budget and resource considerations, etc. However, as mentioned earlier, simply putting this as a standard requirement without (a) some mention of the topics, even just at a high level, to be included in the training program and (b) a sense of how the requirement can be measured may render the standard too vague, which begs a question on the need for this standard.

Regarding the Focus of the Proposed SAR

The SAR Drafting Team proposes that the training standards require the use of a 'systematic' approach to developing training. The 'systematic' approach requires the following:

1. **Determining the needs for training** through a task analysis or job and task analysis process, followed by a training needs assessment. This step enables the organization to know what training its operators need.
2. **Designing and adjusting the training program** to make sure it directly correlates performance requirements, learning objectives, and learning evaluation to tasks. The training program must be designed to bring the system operators from their current level of competency to the organization's desired level of competency.
3. **Developing the training program** so that it includes effective learning experiences and delivery methods. The approach to this step, as well as step 2, will drive the requirements for training and operating staffs.
4. **Delivering the training to the personnel;** in other words, ensure that the training actually takes place as designed.
5. **Verifying and documenting the competency** that the personnel achieved through a documented assessment process

4. **Do you agree with the SAR Drafting Team that the training standards should require use of the 'systematic' approach to training as opposed to requiring specific topics be taught to all personnel for a specific number of hours?**

Yes

No

Comments

We agree that the systematic approach can help responsible organizations to develop a structured and effective training program to help operating personnel to acquire the needed competency to perform their tasks. However, as mentioned earlier, simply putting this as a standard requirement without (a) some mention of the topics, even just at a high level, to be included in the training program and (b) a sense of how the requirement can be measured may render the standard too vague, which begs a question on the need for this standard.

Comment Form – Proposed System Personnel Training Standard

The SAR Drafting Team proposes that the training standard should not include a list of required training topics, because any list of training topics would not be applicable to all entities. Instead, the SAR Drafting Team proposes that each entity provide training to support competent performance of all reliability-related real-time tasks performed within that entity. The final determination of what tasks are performed within each entity, and therefore what tasks must be addressed in the training program needs to be determined by each entity.

5. Do you agree with the approach to a training standard that requires each entity to determine their specific training needs?

Yes

No

Comments

We agree that each entity should determine their specific training needs. However, believe the standard needs to include at least a set of high level training topics to be covered by the training program. Commensurate with our proposal that the RC, BA and TOP are the entities to which this standard will apply at least in the onset, their operating functions are clearly defined in the functional model. There is no reason why some of the topics that reflect their operating functions should not be included, as minimum requirements, in the standard to ensure that there is consistent coverage in the training programs for the same function across the industry, regardless of size, location and organization structure.

6. Please provide any additional comments on the revised SAR that you haven't already provided above.

Comments

We feel that development of a training standard is a step in the right direction in view of the recommendations of the 2003 blackout report and given the requirements to have certified personnel for some of the functional entities and these entities' responsibility to provide training. However, the standard needs to be developed with manageable scope, tangible requirements that can be measured, and with an aim to achieve consistency in training development not just in terms of the process but also in terms of the topics for the same function across the industry. In this vein, we offer the following suggestions for consideration:

- a. The SAR to clearly convey to whom (entities) the proposed standard would apply. To limit the scope at the onset, we suggest the standard be developed for compliance by the RC, BA and TOP only.
- b. The SAR to provide a high level description of the requirements, which should include (i) the use of a systematic approach to develop the training program and (ii) a high level scope of coverage of the training program. The tasks listed in the draft Organization Certification standards for RC, BA and TOP could serve to provide this coverage.

