

The NERC PCGC requested industry comments on proposed changes to the NERC System Operator Certification Program. These include reducing the number of credentials from four to one and reducing the Continuing Education Hour (CEH) requirement for re-certification by 30% for the majority (72%) of credential holders. Our comments will express serious concerns about the proposal but also provide some additional steps that if taken, would allow the PCGC to achieve the general outcomes they desire with our support.

On the surface, both requests seem counterintuitive. Historically, it is a return to 1998 when the program began with just one credential. At that time there were many more balancing authorities or control areas and vertically integrated utilities whose system operators performed similar tasks. However, the program changed five years later to create the four credentials that exist today. This reflected the changes happening in the industry. Control areas were being consolidated and the tasks of different system operators became more segmented, being based on the registration of the NERC Functional Entity the operator worked for.

There is little evidence that this trend has reversed. Therefore, to mandate a test that all operators need to pass to keep their job, recognizing that the test contains items or areas of competency that are not part of that job seems problematic. Currently PER-003 contains 8 areas of competency for the Reliability Coordinator. Only two of these competencies are common across all three applicable entities. To help alleviate these concerns, NERC could consider accepting, where they exist, regional certifications that have been developed through professional certifying agencies. These are tied to actual operator tasks and more likely to ensure the operator meets the minimum requirements of their actual job.

However, recognizing that regional certifications do not exist everywhere, and that there is value in having an independent third party administer a knowledge test, certain realities would have to be acknowledged if the existing four credentials are consolidated. Namely, the test is no longer certifying a job function, but certifying that an individual has a basic but broad knowledge of system operations. Instead of calling the credential holder a “NERC Certified System Operator”, it would be more accurate to say they are “NERC Certified in System Operations”.

On credential maintenance, the PCGC proposes reducing the number of NERC CEHs required for re-certification for most operators from 200 to 140 CEHs, every three years. Concerns about continuing the legacy NERC Continuing Education programs in light of PER-005 have been raised and submitted to NERC in the past. The PER-005 systematic approach should be what determines the training and the number of training hours an operator requires. However, the 30% reduction of hours tied to certification may cause an erroneous assumption by some that the training budget can also be cut by 30%, causing undesired challenges for training departments. Many currently use this hours requirement to help justify their training budgets.

It is also of concern that such a significant change to an hour requirement impacting compliance with PER-003 can be made by a committee and not require the due process and vetting of the NERC Standards Process. The current version of PER-003 does not address recertification. During that standards development, it was stated this was by intention. There is no indication in the PCGC whitepaper that this will change. Such an important change to a training hour requirement should be done through a standard. The most logical standard is PER-005.

It should also be kept in mind that the original hour requirements for certification were set before PER-005 existed. This served the purpose of encouraging companies to create formal training programs when there was no requirement to do so. During this time the NERC PS and NERC PCGC played an important role in helping to ensure operators received quality training. But this torch has now passed to PER-005, which is where it should be. Entities have already experienced multiple audits under this standard. If the outcomes of these audits produced evidence indicating a need to improve PER-005, this should be done through a SAR as is being proposed for PER-003.

Even with these concerns noted, we believe there is opportunity to change these programs in light of PER-005 and address the ongoing industry concerns that have been raised in the past. Taking the following additional steps would allow the PCGC to achieve both goals of consolidating to one credential and reducing or eliminating the hour requirement for recertification.

1. Open a SAR for both PER-003 and PER-005.

The PCGC already acknowledged that a SAR will be required to revise PER-003. This revision would need to remove the reference to multiple credentials and acknowledge that the exam will test basic knowledge of power system operation.

In conjunction with the SAR for PER-003, a parallel SAR should be opened for PER-005. The purpose of this would be to create firm hour training requirements for each applicable entity. Version 1 of PER-005 did have an annual hour requirement (32 hours EOP), but this was removed in version 2 (See Application Guidelines “Rationale for changes to R4” attached to PER 005-2). However, it seems a “bright line” requirement would be a better choice and serve the industry better. It would lessen the need for a NERC committee to determine a “one size fits all” training hour requirement outside of PER-005 and the NERC Standards Process.

The standards drafting team with full industry vetting could determine the most appropriate training hour minimums for each applicable entity and/or create a criterion that takes into account an entities size and potential impact on the reliability of the BES. It may be determined that some entities need a training requirement in excess of the 200 hours the PCGC seeks to eliminate. Or it may be appropriate for some entities to have a requirement of less than the 140 hours the PCGC would set as the new minimum

for everyone. Since simulation training is already addressed in PER-005, the existing requirement in the certification program could also be moved to this standard.

Going forward, companies would develop and track “NERC PER-005 Hours” (training developed, delivered, and audited under PER-005) to meet their annual training requirement as opposed to “NERC CEH” hours.

2. Reduce or remove the CE hours required for re-certification

PJM produced a whitepaper that advocated for the discontinuance of the NERC Continuing Education Program. To address re-certification requirements in the absence of NERC CEHs, various solutions were offered.

One was to remove the hourly training requirement completely. The model of a driver’s license was used as an example. After the driver’s test is passed and the license earned, the driver simply pays to renew his license every few years. Generally, no additional testing or submission of documented training is required. For the certification in system operations, these renewal fees (and new exam fees) would be used as they are today to support the ongoing administration and maintenance of the exam.

There would be no need for the program to track and approve operator training since this is now done under PER-005. This would be the easiest solution and provide the most savings to the industry.

Besides the suggestions offered in the whitepaper, other practical solutions could also work. The model used to maintain a PE or Professional Engineers license could be adopted. A modest continuing education requirement is set, generally about 24 hours over two years. The engineer simply sends his training transcript in and if the licensing body sees the courses (and other approved activities) are relevant, the license is renewed.

This might be a more reasonable way for the non-operator or support personnel to renew their credential without have to participate in the full training program of system operators while also completing the training required for their own job.

Likewise, operators could submit all or part of their PER-005 training transcript to renew their credential. Their hours would no doubt exceed the certification renewal requirement due to the training hour requirements established in the revised version of PER-005-3.

These two recommendations would allow the PCGC to consolidate to one credential and reduce or remove the required training hours for renewal. However, to ensure no impact to reliability, continuing training hour requirements would be added to PER-005 to ensure quality, relevant, and auditable training continues for the core audience of System Operators.