



PER-005 FERC NOPR

- NERC Standard PER-005
 - Approved by NERC Board 2/10/09
 - Requires:
 - SAT approach to training
 - Verification of operator ability to perform duties
 - 32 hour Continuing Education
- FERC Issued NOPR on 6/17/10

FERC Concerns

- FERC proposes to approve PER-005 and PER-004-2 and the retirement of PER-002
- FERC requests modifications to PER-005 to include LCC operators.
 - Issue: How would this be done? Who is responsible? Would PJM as the TOP be responsible for PER-005 requirements for LCC operators or would TOs be responsible for training of their operators?
- FERC has concerns that certain elements of PER-002 (proposed to be retired) were not covered adequately in PER-005.
 - Specifically that operators have complete understanding of RC area, provisions for continuing training and training staff identification and competency. NERC requested to provide explanation.
- FERC expects learning objectives and training material be developed with consideration of the individual needs of EACH operator.
 - Could be an impact if extensive tailoring of training is required based on operator background and competencies.

FERC Concerns

- Questions around whether simulators should model the operators own system or if generic models will suffice for simulator training. FERC appears to be leaning to specific models (even if the simulator hardware is generic).
 - Could be an impact on members that don't currently have simulators.
- FERC looking for NERC to specify performance measures on the effectiveness of the standard.
 - Possible global metric that could be used to compare competency from one entity to another for the purpose of evaluating that entity's training program.
- FERC had concerns around the proposed effective dates of PER-005 and the retirement date of PER-002.
 - Gap where PER-002 was retired and PER-005 was not yet implemented?
- Violation Risk Factors and Severity Levels were deferred pending issue of whether sub-requirements should have these is resolved.
- FERC has great interest in the expansion of training requirements to Generation Operators, Operations support staff and possibly EMS Support staff.
 - NERC to address this in Project 2010-01, Support Personnel Training.
 - FERC would like to see this completed by the fourth quarter of 2011.