

134 FERC ¶ 61,078  
UNITED STATES OF AMERICA  
FEDERAL ENERGY REGULATORY COMMISSION

Before Commissioners: Jon Wellinghoff, Chairman;  
Marc Spitzer, Philip D. Moeller,  
John R. Norris, and Cheryl A. LaFleur.

System Personnel Training Reliability  
Standards

Docket No. RM09-25-001

ORDER GRANTING CLARIFICATION

(Issued February 1, 2011)

1. In this order, with respect to Order No. 742,<sup>1</sup> the Commission grants the motion by ISO New England Inc. (ISO-NE) and National Grid USA to correct the record and the Public Service Electric and Gas Company's (PSE&G) request for clarification.

**I. Background**

2. On November 18, 2010, the Commission issued Order No. 742, a final rule approving two Personnel Performance, Training and Qualifications (PER) Reliability Standards, PER-004-2 (Reliability Coordination – Staffing) and PER-005-1 (System Personnel Training), submitted to the Commission by the North American Electric Reliability Corporation (NERC). The two approved Reliability Standards require reliability coordinators, balancing authorities, and transmission operators to establish a training program for their system operators, verify each of their system operators' capability to perform tasks, and provide emergency operations training to every system operator.

3. On December 17, 2010, PSE&G filed a motion for clarification, seeking clarification that despite the Commission's use of the abbreviation "TO" in the chart outlining the public reporting and records retention burdens contained in paragraph 90 of the final rule, that the Reliability Standard PER-005-1 Requirements apply to

---

<sup>1</sup> *System Personnel Training Reliability Standards*, Order No. 742, 75 FR 72664 (Nov. 26, 2010), FERC Stats. & Regs. ¶ 61,762 (Nov. 18, 2010).

transmission operators not transmission owners. PSE&G notes that traditionally, the acronym “TO” is used for transmission owners rather than transmission operators, which typically are referred to as “TOP.”

4. On December 20, 2010, ISO-NE and National Grid USA filed a motion to correct the record, requesting that the Commission correct paragraph 62 of Order No. 742 to reflect that each of the local control centers (LCC), operating within the ISO-NE’s region are registered with NERC as a Transmission Operator. National Grid USA states that, with respect to National Grid USA and the ISO-NE, the following statement in paragraph 62 is incorrect: “For example, *ISO New England, Inc.*, PJM Interconnection, L.L.C., and New York Independent System Operator, Inc., are registered transmission operators who issue operating instructions that are *carried out by local transmission control centers such as* PSE&G, PPL Electric Utilities Corp., PECO Energy Company, Baltimore Gas and Electric Co., Consolidated Edison of New York, Inc., *National Grid USA*, and Long Island Power Authority, *which are not registered transmission operators.*”<sup>2</sup>

5. National Grid USA states that as a utility holding company, it is not registered with NERC as a transmission operator, however, two of its wholly-owned operating subsidiaries, New England Power Company d/b/a/ National Grid (NEP) and Niagara Mohawk Power Corporation d/b/a/ National Grid are registered with NERC as transmission operators operating within the ISO-NE and New York ISO control areas, respectively. National Grid USA further explains that its subsidiary, NEP owns and operates transmission facilities within the ISO-NE control area and is a New England Participating Transmission Owner in the ISO-NE regional transmission organization. As such, NEP is subject to ISO-NE’s Transmission, Markets and Services Tariff and the Transmission Operating Agreement (TOA). National Grid USA notes that NEP operates transmission facilities that it owns directly as well as transmission facilities owned by its affiliates. NEP also operates a LCC for Rhode Island Eastern Massachusetts Vermont Energy Control. The ISO-NE further states that, like NEP, several of New England’s Participating Transmission Owners operate LCCs under the terms of the TOA, and that each of these LCC operators is registered with NERC as a transmission operator.

## **II. Discussion**

6. We grant both requests to clarify and/or correct the final rule. First, we clarify that in the chart set forth in paragraph 90 of the final rule, that the abbreviation “TO” is intended to reference transmission operators not transmission owners.

7. With respect to paragraph 62, based on the information provided by ISO-NE and National Grid USA, we will correct this paragraph as follows. Specifically, the reference

---

<sup>2</sup> *Id.* P 62 (emphasis added).

to ISO-NE and National Grid USA in the third sentence is removed and the fourth sentence is edited to remove the word “three” and replace “in excess of 200 gigawatts” with “significant” to reflect the removal of ISO-NE from the example in the third sentence. Accordingly, this order corrects paragraph 62 to read as follows:

The Commission understands that local transmission control center personnel exercise control over a significant portion of the Bulk-Power System under the supervision of the personnel of the registered transmission operator. This supervision may take the form of directing specific step-by-step instructions and at other times may take the form of the implementation of predefined operating procedures. For example, PJM Interconnection, L.L.C., and New York Independent System Operator, Inc., are registered transmission operators who issue operating instructions that are carried out by local transmission control centers such as PSE&G, PPL Electric Utilities Corp., PECO Energy Company, Baltimore Gas and Electric Co., Consolidated Edison of New York, Inc., and Long Island Power Authority, which are not registered transmission operators. The combined peak load of these RTOs is significant. In all cases, the local transmission control center personnel must understand what they are required to do in the performance of their duties to perform them effectively on a timely basis. Thus, omitting such local transmission control center personnel from the PER-005-1 training requirements creates a reliability gap. The Commission believes that identifying these entities would be a valuable step in delineating the magnitude of that gap.

The Commission orders:

The request for clarification regarding paragraph 90 and the motion to correct the record regarding paragraph 62 are hereby granted, as discussed in the body of the order.

By the Commission.

( S E A L )

Kimberly D. Bose,  
Secretary.