

UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Before Commissioners: Pat Wood, III, Chairman;
Nora Mead Brownell, Joseph T. Kelliher,
and Suedeem G. Kelly.

Survey on Operator Training Practices

Docket Nos. EL05-24-000
EL05-24-001

ORDER ON CLARIFICATION

(January 25, 2005)

1. On January 13, 2005, the Edison Electric Institute (EEI)¹ requested clarification of the Commission's order issued on December 27, 2004, which directed specified control area operators and transmission providers to complete a survey on their operator training practices.² In this order, we grant in part and deny in part EEI's request for clarification.
2. Further, the North Carolina Eastern Municipal Power Agency (NCEMPA) and American Municipal Power-Ohio, Inc. (AMP-Ohio) filed motions to be excluded from Appendix A of the Operator Training Order, which identified the entities that must participate in the survey. We will grant these requests and revise Appendix A accordingly.
3. In addition, certain of the survey questions contained in Appendix B to the *Operator Training Order* have been non-substantively modified. The modified survey questions are set forth in Appendix B to this order.

¹ EEI is the association of the nation's investor-owned utilities, many of which are subject to the Commission's order directing a survey on operator training practices.

² *Survey on Operator Training Practices*, 105 FERC ¶ 61,365 (2004) (*Operator Training Order*).

Background

4. The *Operator Training Order* directed that, pursuant to section 311 of the Federal Power Act (FPA),³ specified control areas and transmission providers (whether or not they are otherwise subject to the Commission's jurisdiction as public utilities), identified in Appendix A to that order, submit the information requested in the survey contained in Appendix B to that order by January 31, 2005.

5. The Commission contracted with Performance Consulting Services Inc. (PCS), of Overland Park, Kansas, to develop a survey to determine the breadth of training practices across the industry, identify best practices, and evaluate minimum requirements for an effective operator training program. The *Operator Training Order* stated that the Commission's contractor would contact respondents with instructions on how to complete the survey.⁴ The survey developed by PCS is web-based, and respondents will be directed by PCS to the appropriate web-site. PCS developed the list of companies provided in Attachment A to the *Operator Training Order* to provide a representative sample of control areas and transmission owners based on size and regional locations. PCS will provide passwords for those selected by each transmission entity to complete the survey.⁵

6. After issuance of the *Operator Training Order*, the Commission's contractor sent a letter via e-mail to individuals at various entities regarding participation in the study. In this letter, PCS requested that each entity provide it with the name, e-mail address, telephone number, and job title for two people from each of six job classifications that are

³ 16 U.S.C. § 825j (2000). The survey results will be used for informational purposes only, and will not be used as the basis for remedial action. If necessary, compliance with the survey may be compelled pursuant to section 307 of the FPA, 16 U.S.C. § 825f (2000), which authorizes the Commission to issue subpoenas in support of the Commission obtaining information to serve as a basis for recommending legislation.

⁴ *Operator Training Order*, 105 FERC ¶ 61,365 at P 1 n.2.

⁵ PCS has begun contacting respondents. Entities identified in Appendix A of the *Operator Training Order* that have not been contacted should contact Erica Finley of PCS at the following e-mail address: efinley@pcs-mail.com or by phone at (913) 677-3414.

performed by each company.⁶ PCS stated that it would use the contact information to provide each individual recipient with instructions, logins and passwords to electronically complete the survey.

Motion for Clarification and Requests for Exclusion

7. EEI asks the Commission to clarify that the *Operator Training Order* required a single response from each entity required to complete the survey, as opposed to numerous personnel (from each specified entity) individually completing the survey as indicated in the PCS letter. EEI also requests that the Commission clarify that compliance with the Operator Training Order may be achieved by a single filing with the Commission.⁷ It states that a single response would best serve the goal of providing Congress with an accurate and comprehensive report of operator training practices in the United States. EEI argues that a “single company FERC-filing approach will avoid raising many complex issues associated with requiring individual responses to the survey by company personnel to a contractor without corporate review and legal representation, which will undoubtedly create significant delay.”⁸

8. In addition, EEI requests that the Commission clarify that only entities specifically listed in Appendix A to the *Operator Training Order* must file a response to the survey. EEI states that the PCS letter was not sent to all entities listed in Appendix A to the order, while the letter was sent to some entities that do not appear in Appendix A.

9. NCEMPA and AMP-Ohio both filed motions to be excluded from Appendix A to the Operator Training Order. Each states that it is neither a control area operator nor a transmission provider and, therefore, should not have been listed in Appendix A.

⁶ These classifications are Manager, Trainer, Supervisor, Scheduler/Planner, Dispatcher, and Operator/Controller.

⁷ EEI suggests that, “if necessary,” responding entities might also provide a courtesy copy of the Commission filing to the Commission’s contractor.

⁸ EEI Motion at 3.

Discussion

10. While we understand that there are arguments for surveying individual persons, on balance, we will grant EEI's requested relief and consider a single response per entity as compliance with the Commission's order.⁹

11. It is within the Commission's discretion to direct that survey results be submitted directly to PCS instead of the Commission since PCS is the Commission's contractor and will be analyzing the results. Submittal to PCS will constitute filing with the Commission, as required by our prior order. To allow PCS to perform its analysis for the Commission in a timely manner, the Commission will require specified entities to submit their survey results directly to PCS using the "on-line" survey.¹⁰ Based on the PCS analysis provided to the Commission, the Commission will submit a report to Congress. Accordingly, we deny EEI's request for clarification on this issue.

12. EEI states that certain entities have received the PCS instructions for completing the survey that were not listed in Appendix A to the Operator Training Order. Any such letter was sent in error. We clarify that only those entities listed in Appendix A are required to comply with the Operator Training Order. Appendix A has also been modified to identify the correct corporate names of certain entities. In addition, the Commission has modified Appendix A to remove any entities, such as NCEMPA and AMP-Ohio, which were included in error. Appendix A to the instant order contains the revised respondent list.

13. Several of the survey questions contained in Appendix B to the *Operator Training Order* have been non-substantively modified. The modified survey questions are set forth in Appendix B to this order.

⁹ Specified entities that prefer to have individual employees complete the survey may do so by informing PCS.

¹⁰ Once the on-line survey is completed, respondents should print the last page for their records. This will serve as proof of compliance. In addition, respondents may voluntarily submit additional information in narrative format to further explain or clarify their responses to the survey, which is in a multiple-choice format. Such narratives should be filed with both the Commission and PCS. PCS will provide full instructions to the specified entities on how to complete the on-line survey.

The Commission orders:

(A) EEI's motion for clarification is granted in part and denied in part, as discussed in the body of this order.

(B) NCEMPA's and AMP-Ohio's requests to be excluded from Appendix A of the *Operator Training Order* are hereby granted, as discussed in the body of this order.

(C) The Commission's *Operator Training Order* is further clarified, as discussed in the body of this order.

By the Commission.

(S E A L)

Linda Mitry,
Deputy Secretary.

Appendix A
Revised List of Control Areas and Transmission Providers

Alabama Electric Cooperative Corp.
Alabama Power Company
Allegheny Power
American Electric Power Service Corp.
American Transmission Company, LLC
American Transmission Systems, Inc.
Aquila Inc.
Arizona Power Authority
Arkansas Electric Cooperative Corp.
Associated Electric Cooperative, Inc.
Austin Energy Company
Baltimore Gas and Electric Company
Big Rivers Electric Corp
Bonneville Power Administration
Brazos Electric Power Cooperative
Brownsville Public Utilities Board
California Independent System Operator Corp.
CenterPoint Energy, Inc.
Central Iowa Power Coop
Cincinnati Gas & Electric Company
Cinergy Corp.
City of Tallahassee, Florida
City Utilities of Springfield, Illinois
Cleco Power LLC
Commonwealth Edison Company
Conectiv Energy Supply Inc.
ConEdison Energy, Inc.
Connecticut Light and Power Company
Corn Belt Power Coop
Dairyland Power
Detroit Edison Company
Dominion Virginia Power
Duke Energy
Duquesne Light Company
East Kentucky Power Cooperative Inc.
East Texas Electric Cooperative Inc.
El Paso Electric Company
Electric Energy, Inc.

ERCOT ISO
Entergy Services Inc.
Exelon Corp.
First Energy Corp.
Florida Municipal Power Agency
Florida Power & Light Company
Fort Pierce Utilities Authority
Gainesville Regional Utilities
Garland Power & Light
Georgia Power Company
Georgia Transmission Company
Grand River Dam Authority
GridAmerica LLC
Gulf Power Company
Hoosier Energy Rural Electric Coop Inc.
Idaho Power Company
Imperial Irrigation District
Indiana Municipal Power Agency
Indianapolis Power & Light Company
International Transmission Company
ISO New England, Inc.
Jacksonville Electric Authority
Jersey Central Power & Light Company
Kansas City Power & Light Company
Keys Energy Services
Kissimmee Utility Authority
KPL- Westar Energy
L.A. Dept Water & Power
Lansing Board of Water and Light
LGE Energy
Long Island Lighting Company
Louisiana Energy & Power Authority
Lower Colorado River Authority
Metropolitan Edison Company
Michigan Electric Coordinated Systems
Mid-America Interconnected Network, Inc.
Mid-American Energy Company
Midwest Independent System Transmission Operator Corp
MIECO Inc.
Minnesota Power
Mississippi Power Company

Missouri River Energy Service
Modesto Irrigation District
National Grid
Nebraska Public Power District
New England Electric Transmission Company
New York Independent System Operator, Inc.
New York Power Authority
New York State Electric & Gas Corp.
North Carolina Electric Membership Corp.
Northeast Texas Electric Cooperative
Northeast Utilities Service Company
Northern California Power Agency
Northern Indiana Public Service Company
Northwest Power Pool
Ocala Electric Utility
Oglethorpe Power Corp.
Ohio Edison Company (First Energy)
Ohio Power Company (AEP)
Ohio Valley Electric Corp
Oklahoma Gas & Electric
Orange & Rockland
Orlando Utility Commission
Otter Tail Power Company
PacifiCorp
Pacific Gas & Electric Company
PECO Energy Company
Pennsylvania Electric Company
PJM Interconnection, Inc.
Progress Energy
PSEG
Public Service Company of Colorado (New Century Energies)
Public Service Company of New Mexico
Puget Sound Energy, Inc.
Reedy Creek Energy Services
Rochester Public Utilities
Sacramento Municipal Utility District
Salt River Project
San Diego Gas & Electric Company
Savannah Electric & Power Company
Seminole Electric Cooperative
Sierra Pacific Power Company

South Mississippi Electric Power Assoc.
South Carolina Electric & Gas
South Carolina Public Service Authority
Southeastern Power Administration
Southern California Edison
Southern Company Services, Inc.
Southern Minnesota Municipal Power Agency
Southwest Power Pool, Inc.
Southwest Transmission Cooperative
Sunflower Electric Power Corp.
Tampa Electric Company
Tennessee Valley Authority
Tucson Electric Power Company
TXU Electric Delivery
Vermont Electric Power Company
Virginia Electric & Power Company
Wabash Valley Power Association Inc.
WE Energies
Westar Energy
Western Area Power Administration
Western Farmers Electric Cooperative
Wisconsin Public Service Corp.
Xcel Energy
Yadkin, Inc.

Appendix B
Revised Survey Questions

2. Which of the following best describes your job position within the organization in which you work?

- A. Manager
- B. Trainer
- C. Supervisor
- D. Planner
- E. Dispatcher
- F. Operator/Controller

29. Which of the following best describes the Instructor Qualification program at your location?

- A. Qualification is required and completed at our location
- B. Qualification is required but, not followed through at our location
- C. Qualification is not required, but will be in the future at our location
- D. Qualification is not required; there is no plan in place for qualification at our location

39. Who can make recommendations for improvements to training? (Select all that apply.)

- A. Trainees
- B. Managers
- C. Supervisors
- D. Trainers
- E. I do not know

53. Does your training program meet the recommendations of NERC Policy 8, Operating Personnel and Training, guidelines for recommended training requirements for all positions staffed at your location?

- A. Yes
- B. No
- C. I do not know
- D. No training program exists at my location

54. Question 54 has been deleted. Questions appearing in the revised survey have been renumbered accordingly

100.¹¹ Is a continuing training program in place at your location to provide refresher training on overtrain tasks (overtrain tasks are infrequently performed tasks that if improperly performed may result in damage to equipment or hazards to personnel)?

- A. Yes
- B. No
- C. I do not know
- D. Continuing training is not performed at regular intervals at my location

¹¹ This question originally appeared as question number 101, but because of the renumbering caused by the deletion of Question 54, it appears as Question 100 in the current version of the survey.